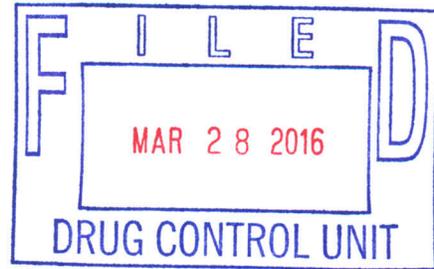


JOHN J. HOFFMAN  
ACTING ATTORNEY GENERAL OF NEW JERSEY  
P.O. Box 45029  
124 Halsey Street, Fifth Floor  
Newark, NJ 07101  
By: Delia DeLisi  
Deputy Attorney General  
(973) 648-4741  
Attorney ID: 008972004



STATE OF NEW JERSEY  
DEPARTMENT OF LAW & PUBLIC SAFETY  
DIVISION OF CONSUMER AFFAIRS  
NEW JERSEY PRESCRIPTION BLANK UNIT

---

IN THE MATTER OF THE NEW JERSEY :  
PRESCRIPTION BLANK VENDOR : Administrative Action  
AUTHORIZATION ISSUED TO :  
DOWNTOWN PRINTING CENTER : **INTERIM CONSENT ORDER**  
: **SUSPENDING PRESCRIPTION**  
: **BLANK VENDOR AUTHORIZATION**

---

Pursuant to N.J.S.A. 45:14-59 et. seq. and the regulations promulgated thereunder, N.J.A.C. 13:45A-27.1 et. seq., Steve C. Lee, the Acting Director of the Division of Consumer Affairs (the “Director”) is empowered to approve all vendors of uniform New Jersey Prescription Blanks (“NJPB”) in the State of New Jersey. Pursuant to N.J.A.C. 13:45A-27.7 and 13:45A-12, the Director is further authorized to terminate, suspend or place conditions on any authorized NJPB vendor.

Downtown Printing Center operating at 46 Paterson Street, New Brunswick, New Jersey, 08901 (“Downtown”) was at all times related hereto an authorized vender of NJPBs in New Jersey.

Between January 15, 2013 and November 20, 2013, Downtown, received three separate orders for a total of 10,000 NJPBs in the name of physician C.A.<sup>1</sup> The orders were placed by an individual who represented to Downtown that she was a nurse in C.A.’s Toms River practice.

---

<sup>1</sup> As C.A. was the victim in this matter his name is redacted to protect his privacy.

C.A., however, was not a New Jersey licensed physician and the person who identified herself as a nurse in his practice was not a nurse licensed in New Jersey. Over the course of eleven months, three orders for NJPBs in the name of C.A. were filled and delivered by UPS to a residential property in Toms River, New Jersey.

On or about November 14, 2014, Downtown received another order for 5,000 NJPBs in C.A.'s name. This order was not delivered to Toms River but picked up at Downtown by an individual whose signature is illegible on the invoice.

On or about November 18, 2013, Downtown received one order for 5,000 NJPBs in the name of another individual, L.R.<sup>2</sup>, who was not a New Jersey licensed physician. This order was shipped on November 26, 2193 by UPS to the same Toms River address as C.A.'s orders.

On or about August 22, 2012, Downtown received one order for 5,000 NJPBs in the name of another individual, G.W.<sup>3</sup>, who was not a New Jersey licensed physician. This order was shipped to an address in Sayreville on September 11, 2012.

At no point did C.A., L.R. or G.W. authorize the ordering of NJPBs from Downtown or otherwise have any knowledge that such an order was to be placed in their names. Downtown failed to verify who the individuals ordering the NJPBs were, that they were in fact New Jersey licensed physicians with active licenses, that the addresses NJPBs were shipped to were the addresses of record on file with the Division and when an individual picked up one order of NJPBs, Downtown also failed to verify that individual was the licensed physician.

During the course of the Division's investigation, Mr. Ruiz acknowledged that Downtown failed to follow procedure and verify that the information provided for C.A. was valid.

---

<sup>2</sup> As L.R. was the victim in this matter his name is redacted to protect his privacy.

<sup>3</sup> G.W. was the victim in this matter his name is redacted to protect his privacy.

The Director preliminarily finds that the acts and omissions of Downtown Printing Center, as detailed above, constitute multiple violations of the following regulations applicable to the ordering of NJPBs:

1. N.J.A.C. 13:45A-27.9(a)1, by failing to obtain the original signature of New Jersey licensed prescribers;
2. N.J.A.C. 13:45A-27.9(a)2, by failing to verify both the prescribers' licenses were active and in good standing and the addresses of record in the Division's database or in notices sent to the vendors;
3. N.J.A.C. 13:45A-27.9(c), by failing to ensure the identity and authority of prescribers to utilize NJPBs prior to printing or delivering any order for NJPBs;
4. N.J.A.C. 13:45A-27.9(d), by failing to deliver NJPBs to the addresses of record on file with the Division.
5. N.J.A.C. 13:45A-27.9(e), by failing to verify that a licensed prescriber was the individual picking up NJPBs from Downtown Printing Center by verifying his documentation of identity and licensure and signature;

Downtown has indicated its desire to resolve this matter pursuant to the terms of this Interim Consent Order. Pursuant to the above information; the Director's authority under N.J.S.A. 45:14-59 et. seq. and the regulations promulgated thereunder, N.J.A.C. 13:45A-27.1 et. seq., and for good cause shown:

**IT IS ON THIS 28<sup>th</sup> day of March, 2016 ORDERED** that

1. The authority of Downtown Printing Center to be a NJPB vendor is temporarily suspended pending review by the Division of any response submitted by Downtown and determination by the Division of what further action to take;

2. Upon receipt of a filed copy of this Consent Order, Downtown shall cease and desist from printing or distributing NJPBs or in any way representing to the public or potential clients that it is an approved printer/vendor of NJPBs. In accordance with N.J.A.C. 13:45A-

27.7(c) Downtown must notify in writing each prescriber and healthcare facility for whom it has printed NJPBs within the previous six months, of its suspension from the program.

3. Downtown has been specifically informed that it may consult an attorney to represent it in this matter. Downtown acknowledges that it has been advised of the ability to consult with counsel and that it has chosen to voluntarily enter into this Consent Order.

NEW JERSEY DIVISION OF CONSUMER AFFAIRS

By:   
Howard Pine,  
Deputy Director

I have read and understood  
this Consent Order and consent  
to be bound by its terms.

Downtown Printing Center

By:   
Juan Ruiz,  
Owner/President

Dated: 3/28/2016