

IN THE MATTER OF

RICHARD TOWNSEND, P.D.

LICENSE NO. 14624,

RESPONDENT

* * * * *

* BEFORE THE

* MARYLAND STATE

* BOARD OF PHARMACY

* 99-BP-028

ORDER FOR SUMMARY SUSPENSION OF LICENSE TO PRACTICE PHARMACY

Pursuant to Md. Code Ann., State Gov't, §10-226 (c) (2) (1995), the Maryland State Pharmacy Board (the "Board") hereby suspends the license to practice pharmacy previously issued to Richard Townsend, P.D., (the "Respondent"), License No. 14624, under the Maryland Pharmacy Act, Md. Code Ann., Health Occ. §12-101 et seq. (1994) (the "Act"). This Order is based on the following information, which the Board has reason to believe is true:

BACKGROUND

1. At all times relevant, Respondent was licensed to practice pharmacy in the State of Maryland. Respondent was initially licensed July 16, 1999.
2. Respondent was charged by criminal indictment in case number 00 N00005968 in the District Court of Talbot County, Easton, Maryland, with two counts of conspiracy to distribute controlled dangerous substances under Art. 27 §290, and with two counts of distribution of controlled dangerous substances ("CDS") under Art. 27 §286.
3. Respondent was employed at the Giant Pharmacy #1223 located at 3223 Elliott Road, Easton, Maryland 21601 until his suspension from that employment on November 3, 1998.
4. Beginning on or about September 19, 1998, Respondent entered into a scheme to distribute CDS with a non-pharmacist, Gregory Vacek. The scheme involved the following:
 - a) Vacek provided Respondent with blank prescription pads.

- b) Vacek would telephone Respondent and tell him the name of the drug that he wanted.
- c) Respondent would find a name of a patient in the Giant pharmacy's computer data and then filled out the prescription with that patient's name and Vacek's requested CDS.
- d) Respondent would enter the patient and prescription information into the pharmacy's computer and fill the CDS.
- e) Vacek would come to the pharmacy and Respondent would "sell" Vacek the CDS. Vacek would pay the co-payment. In this manner, third party payors were billed for these fraudulent and illegal prescriptions.
- f) Vacek would exit the pharmacy and would enter Respondent's car. Vacek would leave cash for Respondent in amounts between \$5.00 and \$400.00 in Respondent's car.
- g) On October 23, 1998, another Giant pharmacist, Pharmacist A, reported having witnessed Respondent fill a prescription for a patient and enter the information in the computer, where there was no valid prescription.
- h) On November 1, 1998, Respondent discussed the illegal and fraudulent prescriptions with the Pharmacy Supervisor, who in turn reported the matter.
- i) Subsequently, the Maryland State Police/Diversion Task Force became involved. On November 11, 1998, Respondent participated in a "controlled drug buy." Vacek entered the Giant pharmacy, picked up and paid for a pill bottle containing 100 dosage units of Dilaudid, a CDS of Schedule II, and a second pill bottle containing 100 dosage units of oxycodone, a CDS of Schedule II. Vacek then left the Giant store and entered Respondent's car where Vacek left \$130.00 in cash wrapped in empty pharmacy bags.

j) Between September 9, 1998 and October 14, 1998 it is known that fraudulent and illegal prescriptions were dispensed by Respondent for 520 units of oxycodone, 225 units of Dilaudid, 100 units of M3 Contin, , all of which are Schedule II CDS narcotics. Between September 9, 1998 and October 14, 1998 it is known that fraudulent and illegal prescriptions were dispensed by Respondent for 50 units of Vicoprofen, a Schedule III CDS narcotic, and 50 units of diazepam a Schedule IV CDS narcotic.

5. Respondent's defense to this course of conduct is 1) that Vacek had cancer and had difficulty obtaining the drugs legitimately, and 2) that Vacek was threatening Respondent with bodily harm if Respondent did not participate in this scheme.

6. Respondent admitted to Tom McElroy, State Police/Diversion Task Force, and Dave Denoyer, the Board's investigator, to the information contained above. (Attached and incorporated as Exhibit A, District Court Charge Summary and supporting Statement of Probable Cause).

7. The Board recently became aware that Respondent is employed as a pharmacist at a CVS drug store. Respondent poses an immediate threat to the public health, safety and welfare.

8. Respondent's conduct, as described above in ¶¶ 2 through 7 of distribution of controlled dangerous substances and conspiracy to distribute controlled dangerous substances is in violation of the Maryland Pharmacy Act found at Md. Code Ann., Health Occ. §12-101 et seq. and is specifically a violation of §§12-313 (5) (Submits a false statement to collect a fee), (6) (Willfully makes or files a false report or record as part of practicing pharmacy), and (14) (Dispenses any drug, device, or diagnostic for which a prescription is required without a written, oral, or electronically transmitted prescription from an authorized prescriber).

CONCLUSIONS OF LAW

Based upon the foregoing, the Board finds that the public health, safety and welfare imperatively requires emergency action pursuant to Md. Code Ann., State Gov't §10-226 (c) (2) (1995).

ORDER

It is therefore, this 4 day of March, 1999, by the State Pharmacy Board,

ORDERED, that pursuant to the authority granted the Board by Md. Code Ann., State Gov't §10-226 (c) (2) (1995), the license of the Respondent, Richard Townsend (No. 14624), to practice pharmacy in the State of Maryland, be and is hereby **SUMMARILY SUSPENDED**; and be it further

ORDERED, upon presentation of this Order for summary suspension, Respondent shall immediately deliver to the Board, through the Board's executive director or its designee, the display, renewal certificate, and wallet-sized license to practice pharmacy previously issued by the Board; and be it further

ORDERED, that a show cause hearing has been scheduled for Tuesday, March 9, 1999, at 11:00 a.m., at 4201 Patterson Avenue, Baltimore, Maryland 21215 at which the Respondent will be given an opportunity to be heard on the issues limited to those raised in this Order, that is, regarding the Respondent's fitness to practice pharmacy and the danger to the public. This hearing will be held before a panel of the Board. Respondent shall notify the Board by calling Norene Pease, Executive Director or Dave Jencyer, Board Investigator at (410) 764-4756 *no later than March 8, 1999*, of his intention to appear at the hearing on March 9, 1999.

NOTICE OF HEARING

A full evidentiary hearing will be scheduled before the Board at 4201 Patterson Avenue, Baltimore, Maryland 21215, if the Respondent requests such a hearing. Any such hearing will be scheduled to be heard by the Board within thirty (30) days of receipt of Respondent's written request therefor.

3/4/99
Date

W. Irving Lotzler, Jr.
W. Irving Lotzler, Jr., P.D.,
Secretary, Board of Pharmacy

EXHIBIT A

STATE BOARD OF PHARMACY

V.

RICHARD TOWNSEND, P.D.



DISTRICT COURT OF MARYLAND FOR Talbot County

Located at 102 W. Dover St., Easton, Maryland 21601

Case No.:004N00005968

STATE OF MARYLAND

VS

TOWNSEND, RICHARD EDWARD

9140 FOX MEADOW LANE

EASTON, MD 21601

COMPLAINANT:

Officer: MCELROY, THOMAS G SGT

Agency/Subagency: MSP 9039

ID: 2201

COA:

SID:

Local ID:

DL#: T525738189106

DL State: MD

Race: 2 Sex: M Height: 6'2" Weight: 200 Hair: BRN Eyes: BLU

DOB: 02/09/1970 Phone(H): (410) 770-4495 Phone(W): (410) 819-3218

CHARGE SUMMARY

UPON THE FACTS CONTAINED IN THE APPLICATION OF MCELROY, THOMAS G SGT IT IS FORMALLY CHARGED THAT TOWNSEND, RICHARD EDWARD at the dates, times and locations stated in the Charging document:

CHG/CIT	STATUTE	PENALTY	DESCRIPTION OF THE CHARGE
2 3599	27290		CDS ATTEMPT, CONSPIRACY
2 0696	27286	20 Y &/or \$25,000.00	CDS MANUF/DIST-NARC
2 3599	27290		CDS ATTEMPT, CONSPIRACY
2 0696	27286	20 Y &/or \$25,000.00	CDS MANUF/DIST-NARC

COPY POLICE

[Handwritten Signature]

Date: 11/04/1998 Time: 02:15 AM

Judicial Officer:

Stephen J. Shortall

3068 3068

Tracking No. 960010125060



LOCATED AT (COURT ADDRESS)

DC Case No: DC 9968

RELATED CASES:



COMPLAINANT

DEFENDANT

NAME (LAST, FIRST, M.I.) McElroy, Thomas C			TITLE Sgt			NAME (LAST, FIRST, M.I.) Townsend, Richard			TITLE E					
AGENCY MSP			SUB-AGENCY 9007			ID. NO. (POLICE) 2201			MAFIS NAME (LAST, FIRST, M.I.)			TITLE		
WORK TELEPHONE 410 962 7580			HOME TELEPHONE 410 962-7580			ID. NO.			RACE W	SEX M	HT. 62	WT. 100	D.O.B. (MM/DD/YY) 2-9-70	
ADDRESS 200 ST PAUL PL SUITE 2222			APT. NO.			WORK TELEPHONE ()			HOME TELEPHONE 410 770-4493			CC/OCA NO.		
CITY BALTO			STATE MD			ZIP CODE 21202			HAIR Brd	EYES Blue	OTHER DESCRIPTION			
ADDRESS 9140 Fox Meadow Lane			APT. NO.			WORK TELEPHONE			HOME TELEPHONE			CC/OCA NO.		
CITY EASTON			STATE MD			ZIP CODE 21601								

DOMESTIC VIOLENCE HATE CRIMS CHILD ABUSE VULNERABLE ADULT ABUSE Page 1 of 5

STATEMENT OF PROBABLE CAUSE

ARREST ON TRAFFIC/NATURAL RESOURCES VIOLATIONS/TRANSIT VIOLATIONS/CRIMINAL CHARGES/MUNICIPAL ORDINANCE/PUBLIC LOCAL LAW

THE DEFENDANT HAS BEEN ARRESTED UPON THE FOLLOWING INFORMATION OR OBSERVATION: (MAKE A FULL, CONCISE AND DEFINITIVE STATEMENT OF ESSENTIAL FACTS CONSTITUTING THE OFFENSE CHARGED.)

Pursuant to a cooperative investigation between the drug enforcement administration

Tactical Diversion Squad, and the Giant Food Inc. Security Division, information was

developed that a licensed pharmacist identified as defendant Richard Townsend, was

writing and filling prescriptions for various Controlled Dangerous Substances at the

Giant Pharmacy, 3223 Elliot Road, Easton, Maryland. The following prescriptions were

provided to Sgt. McElroy as having been filled by Townsend:

DATE	PATIENT NAME	DRUG	QUANTITY	DOCTOR
9-19-98	Dwight Davis	Oxycodone	60	Flann
9-18-98	Dwight Davis	Dilaudid	30	Flann
9-19-98	Brian Davis	Oxycodone	100	Flann
9-22-98	Wallace Miller	Dilaudid	30	Flann

 CONTINUED ON ATTACHED SHEET (FORM DC/CR 4A) PROBABLE CAUSE CHARGES #

LACK OF PROBABLE CAUSE CHARGES #

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE MATTERS AND FACTS SET FORTH IN THE FOREGOING DOCUMENT ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

DATE 11-4-98	ARRESTING OFFICER T-100
CITY BALTO	SUB-AGENCY 9007
ID. NO. 2201	

I HAVE REVIEWED THE STATEMENT OF CHARGES AND HAVE DETERMINED THAT		
<input type="checkbox"/> THERE IS PROBABLE CAUSE TO DETAIN THE DEFENDANT		
<input type="checkbox"/> THERE IS NOT PROBABLE CAUSE TO DETAIN THE DEFENDANT AND I HAVE ACCORDINGLY RELEASED HIM ON HIS OWN RECOGNIZANCE.		
DATE 11-4-98	JUDICIAL OFFICER	COMMISSIONER ID. NO.

Tr. #980010125030

DC/CR 4 (Rev. 3/95)

LAW ENFORCEMENT



LOCATED AT (COURT ADDRESS)

DISTRICT COURT
CASE NUMBER

DEFENDANT'S NAME (LAST, FIRST, MI)
Townsend Richard

MAFIS NAME

STATEMENT OF PROBABLE CAUSE (CONTINUED)
ARREST ON TRAFFIC/NATURAL RESOURCES/MASS TRANSIT CITATIONS/CRIMINAL CHARGES/MUNICIPAL ORDINANCES/PUBLIC LOCAL LAWS

DATE	PATIENT'S NAME	DRUG	QUANTITY	DOCTOR
10-07-98	Linda Bronshaw	Oxycodone	120	Flaum
10-07-98	Thomas Adams	Dilaudid	100	Schwartz
10-10-98	Teresa Johnson	Oxycodone	120	Flaum
10-13-98	David Reynolds	MS Contin	100	Schwartz
10-13-98	David Reynolds	Vicoprofen	50	Schwartz
10-14-98	Dorothy Bailey	Dilaudid	60	Flaum
10-14-98	Dorothy Bailey	Oxycodone	120	Flaum
10-14-98	Dorothy Bailey	Diazepam	50	Flaum

Sgt. McElroy contacted the above listed physicians and was advised that these patients were not patients of either physician. Sgt. McElroy was further advised that they had not written the above listed prescriptions.

On Tuesday, November 11, 1998, surveillance was initiated at the giant pharmacy. Richard Townsend was observed leaving his vehicle, a blue saturn, MD REG CFP-609 and entering the pharmacy. At approximately 7:45 P.M. a white male, later identified as defendant Gregory Wacek, was observed exiting a white Lincoln 2DR and entering

the Saturn. A short time later he was observed entering the pharmacy and picking up

CONTINUED ON ATTACHED SHEET (FORM DC/CR 4A)

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE MATTERS AND FACTS SET FORTH IN THE FOREGOING DOCUMENT ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

DATE: 11-4-98 ARRESTING OFFICER: [Signature]

AGENCY: [Signature] SUB-AGENCY: 90201 ID. NO.: 2721

TRACKING NUMBER



LOCATED AT (COURT ADDRESS)

DISTRICT COURT
CASE NUMBER

DEFENDANT'S NAME (LAST, FIRST, M.I.)

MAFIS NAME

Townsend, Richard E

Page 3 of 5

STATEMENT OF PROBABLE CAUSE (CONTINUED)

ARREST ON TRAFFIC/NATURAL RESOURCE/MASS TARIFF CITATIONS/CRIMINAL CHARGES/MUNICIPAL ORDINANCES/LOCAL LAWS

and paying for a prescription. Vacek Shortly thereafter responded back to the Saturn and sat in the passenger seat. Shortly thereafter Vacek was arrested. Search incident to the arrest revealed in the front right pocket a small pill bottle labeled Dilaudid (Hydrocodone, a COS of Schedule II, one hundred (100) dosages, and another pill bottle containing one hundred (100) dosage units of Emcydonas also a COS of schedule II

Both Vacek and Townsend were arrested and taken to the Eastern Barracks of the Maryland State Police where they were advised of their rights per miranda. Townsend had previously waived his miranda rights and previously advised that Vacek had initially coerced him into filling prescriptions for him and then later was threatened by him to continue to fill prescriptions. Townsend stated that Vacek would call him and tell him what drugs he wanted. Vacek would also provide him with a blank prescription. Townsend was to then find a patient name in the computer system and fill out the prescription under that name. He was then to provide Vacek with the name and Vacek could then pick up the prescriptions.

CONTINUED ON ATTACHED SHEET (FORM DC/CR 46)

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE MATTERS AND FACTS SET FORTH IN THE FOREGOING DOCUMENT ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

DATE 11-11-98	ARRESTING OFFICER [Signature]
AGENCY 1118	SUB-AGENCY 9030
ID. NO. 2201	

TRACKING NUMBER



AGENCY (COURT ADDRESS)

DISTRICT COURT
CASE NUMBER

DEFENDANT'S NAME (LAST, FIRST, M.I.)

MAINTENANCE

Townsend, Richard E

Page 4 of 5

STATEMENT OF PROBABLE CAUSE (CONTINUED)

ARREST OR TRAFFIC VIOLATION, DISORDERLY CONDUCT, VIOLATION OF PROBATION, CRIMINAL CHARGES, VIOLATION OF FINANCIAL PROBATION, LOCAL LAWS

Townsend stated that this occurred on approximately 15 to 20 occasions. Townsend advised that he did receive money for the prescriptions but that the reason he was doing it was because he feared for his family's safety.

Yacal advised that he arranged with Townsend to fill the prescriptions because the prices he wanted were very expensive on the street and Townsend could sell the pills for much less. Yacal stated that he consumed approximately four (4) tablets of Dilaudid each day for pain. Yacal further admitted to picking up prescriptions on approximately 10 (ten) different occasions and leaving money for Townsend for the pills.

Additionally, a search of the Saturn revealed in the glove compartment \$120.00 cash wrapped in empty pharmacy bags. Also recovered was a brown bag containing paraphernalia and a blank prescription from Dr. Blain. Yacal advised that the bag belonged to him.

Sgt. McIlroy has been a fully sworn member of the Maryland State Police for over the past 6 years and has been regularly assigned to the investigation of illegal prescription drug diversion for over the past six years. Through Sgt. McIlroy's training knowledge and

(If continued on attached sheet (FORM DCOR 4A))

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE MATTERS AND FACTS SET FORTH IN THE FOREGOING DOCUMENT ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

ARRESTING OFFICER'S	
<i>[Signature]</i>	
AGENCY	SUB-AGENCY
MSP	703
FILE NO.	2001

TRACKING NUMBER



LOCALITY (COURT ADDRESS)

DISTRICT COURT
CASE NUMBER

DEFENDANT'S NAME (LAST, FIRST, M.I.)

DATE

Townsend, Richard E

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STATEMENT OF PROBABLE CAUSE (CONTINUED)

ARREST OR TRAFFIC VIOLATION CHECK/MARSHAL CITATION/CRIMINAL CHARGE/MUNICIPAL ORDINANCE/PUBLIC LOCAL LAWS

experience, he believes that probable cause exists that Townsend, and Worsick entered into a conspiracy to illegally obtain and distribute the above listed drugs including Oxycodone, Hydrocodone (DILAUDID), MS Contin (MSI Schedule II Narcotics

CONTINUED ON ATTACHED SHEET (FORM DCOR 4A)

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE MATTERS AND FACTS SET FORTH IN THE FOREGOING DOCUMENT ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

18
11-3-98

AGENCY: MSP SUB AGENCY: 90301 ID. NO.: 2301

ACTING OFFICER: [Signature]

TRACKING NUMBER

LOCATED AT (COURT ADDRESS)

RELATED CASES:

DISTRICT COURT CASE NUMBER

DEFENDANT'S NAME (LAST, FIRST, MI.)

NAME (LAST, FIRST, MI.)		TITLE		NAME (LAST, FIRST, MI.)		TITLE	
McElroy, Thomas G		Sgt		Thomas, Richard E		Sgt	
AGENCY		SUB-AGENCY		ID. NO. (POLICE)		MATS NAME (LAST, FIRST, MI.)	
MSR		9007		220			
WORK TELEPHONE		HOME TELEPHONE		RACE		SEX	
942-7580		410942-7580		W		M	
ADDRESS		APT. NO.		HT.		WT.	
200 ST Paul PL				6'3"		200	
CITY		STATE		D.O.B. (MM/DD/YY)			
BALTO		MD		12-19-70			
ZIP CODE		21202		D.O.A.			
				HAIR		EYES	
				Blk		Blu	
WORK TELEPHONE		HOME TELEPHONE		OTHER DESCRIPTION			
ADDRESS		APT. NO.		CITY		STATE	
9140 E. Boston				BALTO		MD	
CITY		STATE		ZIP CODE			
BALTO		MD		21202			

DOMESTIC VIOLENCE HATE CRIME VULNERABLE ADULT ABUSE CHILD ABUSE Page 1 of 2

STATEMENT OF PLAINTIFF

IT IS FORMALLY CHARGED THAT THE DEFENDANT

CHS CODE	AN	ON OR ABOUT (DATE)	AT (PLACE)
2-3599		Between 9-9-98 and 10-14-98 at Great Charming,	
9222 Elliott Dr, BALTO MD did voluntarily distribute a controlled substance to the defendant, a substance of schedule II, without expenditure of money.			
MARIJUANA			
IN VIOLATION OF:			
MD ANN CODE, ART.	SEC	(COMMON LAW OF MD)	(FOR LOCAL LAW, ART. AGAINST THE PEACE, GOVERNMENT AND DIGNITY OF THE STATE)
			PROBABLE CAUSE
COMAR OR MISHY CODE NO.	ORDINANCE NO.	COMMISSIONER'S INITIALS	
		35 12/10/98	

CHS CODE	AN	ON OR ABOUT (DATE)	AT (PLACE)
2-20191		Between 9-19-98 and 10-14-98 at Great Charming,	
9222 Elliott Dr, BALTO MD did voluntarily distribute to the defendant, a controlled substance of schedule II, without expenditure of money.			
MARIJUANA			
IN VIOLATION OF:			
MD ANN CODE, ART.	SEC	(COMMON LAW OF MD)	(FOR LOCAL LAW, ART. AGAINST THE PEACE, GOVERNMENT AND DIGNITY OF THE STATE)
27	21		PROBABLE CAUSE
COMAR OR MISHY CODE NO.	ORDINANCE NO.	COMMISSIONER'S INITIALS	
		35 12/10/98	

CONTINUED ON ATTACHED SHEET (SEE FLOOR 2A)

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE MATTERS AFORESAID ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

DATE: 12/10/98

AGENCY: MSR

SUB-AGENCY: 9007

ID. NO.: 220

950010125000

950010125000

DC/CR 2 (Rev. 9/95)



LOCATED AT (COURT ADDRESS)

DISTRICT COURT CASE NUMBER

DEFENDANT'S NAME (LAST, FIRST, M.I.)
Townsend, Richard

MAFIS NAME
MAY 17 10 11 AM '98

D.O.B.
8-9-70

STATUTE (COURT CHARGE IS (C) OR (P) OR (M))

IT IS FORMALLY CHARGED THAT THE DEFENDANT

312-3599 Between 9-19-98 and 10-19-98 at Court Pharmacy
8222 Elliott Dr. Easton MD in did conspire with Gregory
Vacker to unlawfully distribute a controlled dangerous
substance of schedule II to wit: Hydromorphone, A Narcotic
Drug

INVIOLATION OF
 MD. ANN. CODE ART. 27 SEC 28 COMMON LAW OF MD. SUB. LOCAL LAW, ART. AGAINST THE PEACE, GOVERNMENT AND HONOR OF THE STATE PROBABLE CAUSE COMAR OR AGENCY CODE NO. ORDINANCE NO. COMMISSIONER INITIALS ID NO.

4 2-0676 Between 9-19-98 and 10-19-98 at Court Pharmacy

8222 Elliott Dr. Easton, Md. in did unlawfully distribute
TO Gregory Vacker a controlled dangerous substance of
Schedule II, To wit: Hydromorphone, A Narcotic
Drug

INVIOLATION OF
 MD. ANN. CODE ART. 27 SEC 28 COMMON LAW OF MD. SUB. LOCAL LAW, ART. AGAINST THE PEACE, GOVERNMENT AND HONOR OF THE STATE PROBABLE CAUSE COMAR OR AGENCY CODE NO. ORDINANCE NO. COMMISSIONER INITIALS ID NO.

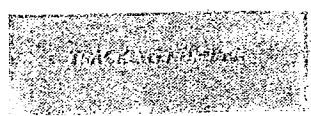
INVIOLATION OF

INVIOLATION OF

INVIOLATION OF
 MD. ANN. CODE ART. 27 SEC 28 COMMON LAW OF MD. SUB. LOCAL LAW, ART. AGAINST THE PEACE, GOVERNMENT AND HONOR OF THE STATE PROBABLE CAUSE COMAR OR AGENCY CODE NO. ORDINANCE NO. COMMISSIONER INITIALS ID NO.

CONTINUED ON ATTACHED SHEET (FORM DC/CR 2A)

I SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE MATERS AND FACTS SET FORTH IN THE FOREGOING DECLARATION ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.
DATE 11-4-98
SUB-AGENCY 91234
ID NO. 2241



STATE OF MARYLAND