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What follows is long, I apologize in advance for its length.

Since you investigated my case I wanted to share my story with you so that you might better understand the circumstances surrounding the investigation.

Due to the circumstances surrounding the wrongful termination of my employment with Walgreen's International and the unlawful reporting of an illegal drug test to the board of pharmacy that was deliberately misrepresented as legitimate and because it should have had bearing on the case I am now going to relay information to you, as a courtesy, that I could not relay to you in 2012 when your investigation was initiated.

Having conceded that I made a mistake by taking one of my children's ADHD medications even though I am ADHD you may be wondering why I am calling this to your attention.

I'm sharing my story because my rights to due diligence and due process were egregiously violated by the parties involved, these agencies were in violation of multiple state and federal laws, both civil and criminal, I was treated hostilely and retaliated against, and my family received death threats.

I must emphasize that I did not obtain this information as a result of insider information while employed with Walgreens but quite the opposite. The formulation of this case is based on independent observations, in depth research and case law. You must understand that I bring this information to your attention at considerable peril to myself and to my family. I do so to set the record straight, knowing my motive will be questioned, but understanding I have a duty to share the truth. I do so as a courtesy.

Understand that the mishandling of this case by my former employer and its resultant sequelae extends to all agencies/parties who have been touched by it and as such I have scrutinized, and will continue to scrutinize any and all actions taken by such agencies, not excluding the board of pharmacy. Do not take this personally, good case work demands it.

Furthermore, when I told my children that I had done something as simple as requesting the public hearing records from the board regarding this case my eldest daughter remarked, "But Mom, what about us, what if they come after us again." I reassured her that everything would be okay. But still I wonder, *Will it be? Will anything ever be okay ever again?*

Multiple people know my story. The case work and investigational material regarding this case is extensive and much of it will never be disclosed. As of this writing, portions of the material are being revealed on a need to know basis.

I don't do lawsuits and I don't make false accusations, ever.

There are individuals who have been instructed to reveal select information to the public should my demise become apparent or if I am killed in an unfortunate accident.

Let this story serve as a warning.

What I am about to reveal to you will demonstrate 4 salient facts, 1) I was wrongfully terminated 2) Walgreen's contracted drug testing agency, Pembroke Medical, is an illegal contracting agency 3) The drug test in question was illegal but misrepresented as legal both to my former employer and to the board 4) Walgreen's was in violation of federal govt contracts, and stood to lose billions had those violations been revealed.

Before I continue, I want to say I welcome your skepticism and I would encourage you to do your own research.

(I will present events with emphasis on pertinent issues/discrepancies')

Consider the following:

Observations on the day of the drug test:

I went into the employee break room, taking note that no information had been posted regarding the rules and regulations governing drug tests, and furthermore the notices required by federal law regarding employee rights and labor law were absent. As well Walgreens had not established a drug free workplace training program, nor had it designated a DER (employee designee/liaison knowledgeable about drug testing regulations, company policy and procedures and responsible for

providing information and answering employee questions as well as facilitating drug training programs as mandated by DOT and DFWA).

The day of the drug test (on or about March 30, 2012) when I was presented with the CCF form (this form lists pertinent info about the drug test per federal law it must contain certain information and it must be accurate) I noted that the doctor's name was foreign, definitely East Indian in origin.

I thought nothing of leaving the building before it was my turn to test, furthermore at least one other employee did so as well. No instructions had been given to us forbidding it.

We were not required to present positive ID to the sample collector.

On at least one occasion the person collecting the urine samples left them unattended and out of her sight while she approached the pharmacy counter.

All of the above are violations of DOT (Dept of Transportation) drug testing regulations and most would apply to non-DOT approved tests. Three of these violations however completely render the drug testing procedure as null and void.

- 1. Failure to establish a workplace drug free employee training program.**
- 2. Failure to require positive ID**
- 3. Inaccurate information on CCF, the contracting agency and doctor (doctor=MRO=Medical Review officer) must be listed on the federal form. The contracting agency, Pembroke Medical and MRO, John Cametas, were not indicated on the form, the MRO on the form was an East Indian.**

This alone renders all the drug tests performed on that day as invalid. The whole testing procedure was invalid, and so none are legal. Why might this be important? Through my research I found public records that indicated that Walgreens had been cited for noncompliance with DOT, and had until either March 30th (the day of the test), or 31st of 2012 to be compliant. Failure to do so would put Walgreen's in jeopardy of losing their federal contracts with Medicare and Medicaid, as well as put them in violation of the Drug Free Workplace Act which was a condition of the shared work program agreement they had with the State of Missouri.

The contracts they stood to lose were worth billions.

SANCTIONS

The imposition of sanctions under Drug Free Workplace Act (DFWA) requires a written determination of violation from the federal “agency head” or designee. The first ground for sanctions is false certification (e.g., an employee awareness program was never established). The second is failure to comply with the requirements of the certification (e.g., the employee awareness program was not ongoing). The third is “such a number of employees of the grantee” have been convicted of criminal drug statute violations occurring in the workplace “as to indicate that the grantee has failed to make a good faith effort to provide a drug-free workplace.”

Employees’ criminal drug statute violations occurring outside the workplace do not trigger sanctions. Likewise, employees’ drug abuse in the workplace without criminal convictions do not trigger sanctions.

Violations of the act may result in: (1) suspension of grant payments; (2) suspension or termination of grants; or (3) suspension or debarment of the recipient. The decision of which sanction or sanctions to apply in a particular case is left to the discretion of the federal government. A debarred recipient is ineligible for any award from a federal agency during the term of the debarment, which may be up to 5 years. The agency head may waive a particular grant, suspension if it is determined by the agency head that such a waiver would be in the public interest. This authority cannot be delegated to any other federal official.

I will provide additional references at my discretion upon request.

While the above violations could have been considered honest mistakes or due to sheer sloppiness they might have not been considered willful violations, but Walgreen’s was out of time, and what transpired after that in regards to the mishandling of my drug test demonstrates that both Pembroke and Walgreens showed a careless disregard for the law, a careless disregard for the health, welfare and safety of their employees, and as well were endangering the public.

On a Friday approximately a month after the drug tests, my store manager Greg Ulrich approached me in the pharmacy. His demeanor was striking, he avoided eye contact and handed me a piece of paper before leaving, all without uttering a single word. In no way did he indicate what I should do regarding the paper. It was an email from Pembroke Medical, sent over the company network, that indicated an issue with my drug test. A man whose demeanor was usually upbeat and positive, whom I respected, had been reduced to a state of uneasy shame by his deliverance of that single message. I knew then that something was terribly wrong, but what I could not have known was that it was about to get much, much worse.

Having physical possession of the email I was able to ascertain that it had not been sent over a secure network as required by law, Pembroke had a secure encryption option but evidently didn't opt to use it. Since the email was not sent securely, the information in that email could have been read by anyone with access to a company computer, and could have damaged my reputation. The company violated HIPPA laws by not securing it.

DOT regulations (DOT Rule 49 CFR Part 40) require that the MRO/Contracting agency (Pembroke Medical/John Cametas) make a concerted effort to contact the employee regarding drug test results, but then conflate this rule by stating if the DER (Who I can only assume was Mr. Ulrich, since I had no way of even knowing what a DER was at that time) informs the employee he must contact the contracting agency, then the employee must make contact within 72 hours.

Keep in mind that because of the unusual circumstances surrounding the drug test I had by this time done considerable research so as not only to better understand my rights but I also understood that billion-dollar govt contracts were at stake. I found it highly suspect that I was informed of my need to contact Pembroke late on Friday, it smacked of a deliberate maneuver to run out the clock, this occurred approximately a month after original drug tests were given. (I would find out later through company investigations they had these results on 4/11/12 but had withheld them from me) My phone was startlingly silent; it had become obvious that Pembroke had no intention of contacting me. Naturally I was upset and felt an urgency to contact them and was worried that because it was the weekend, I would be unable to do so in a timely fashion. I did reach Pembroke on Saturday and was told to call back during the week.

My initial contact with Pembroke (the persons I spoke to were in Virginia) was with the woman who answered my phone call, I asked her to speak to the MRO and she replied, "I am the MRO." At that moment I knew two things, they had already decided I was guilty and the woman was lying. She couldn't possibly be Dr. John Cametas as he is a male.

I asked for my test results. She did not give me my test results and instead offered me a menu of drugs from which to choose. I do not recall what I said to her in reply, but I did ask what medical information I needed to provide, and ended the call by saying I would send pertinent info via email to their agency.

DOT regulations specifically state that office personnel may only act to facilitate an employee's contact with the MRO, they specifically prohibit unqualified office personnel from gathering information or doing investigations. Offering a drug menu in lieu of test results is prohibited and legal precedents have found such actions to be legally indefensible.

By law the employee must be given the opportunity to discuss the drug test in question with a certified MRO. The test result in question can be verified as positive, false positive, etc. but the final determination can only be made by an MRO.

By this time, I knew something was terribly wrong. I had been lied to and my requests to speak to the MRO, John Cametas, were being ignored. I saw red flags that not only called the legitimacy of the contractor into question, but their intent.

So, I started digging for information on Pembroke Medical and John Cametas. I ascertained that Walgreen's had contracted Pembroke, and that they were a third-party MRO and drug testing contractor. At the time Pembroke was advertising its drug testing services in tandem with eScreen (Pembroke acquired the eScreen brand via a 2010 merger)

Side note: Understanding that corporations love branding opportunities I wondered if the eScreen and eScribe brands were related.

At the time, in 2012, it was illegal for an employer to contract a third-party contracting agency for MRO services and drug tests, DOT (federal regulations) specifically forbade it.

I also found out that Pembroke has been consistently awarded government contracts over the years, and that these contracts may go back all the way to 1963 and possibly the 1940s. I further determined that Pembroke has connections to a prominent political family in Delaware as well as strong political connections in D.C. including the Dept. of Defense (DOD).

These connections would explain what I could not, how it was that an illegal contractor could continue to operate.

My research determined that Pembroke has a history of legal trouble regarding its business practices and has had at least one formal investigation initiated by the US military. One of these investigations determined that Pembroke had defrauded the federal govt by providing inaccurate drug tests to the US military, in this instance it was the Navy, and as well had been careless/sloppy in its execution of these tests. However, no action was taken.

I have reason to believe that Pembroke holds government contracts for drug testing for all four branches of the US military.

Furthermore, I found multiple lawsuits relating to the award of govt contracts from competing agencies that alleged bid rigging and suggested that at least on one occasion Pembroke had illegally obtained a contract from underneath a competing contracting agency. I also found lawsuits against Pembroke filed by current and former employees. I found all of this information in a relatively short period of time so this is likely only the tip of the iceberg.

Referenced cases are available at my discretion upon request.

Regarding the MRO, (also listed as the executive chairman of Pembroke), one John Cametas had at least /four/ licensing actions on his medical license, furthermore his medical background does not suggest expertise in pharmacology or drug testing, on the contrary he is a podiatrist. He as well was disciplined by the state of Virginia for tax evasion. I limited my record search to Virginia, so I cannot say whether Cametas has licensing actions in other states.

Please view attached document labeled: Cametas licensing documents.

Keep in mind that I had possession of this information while still working at Walgreens. I had an expectation of 'fair play' regarding Pembroke that was quickly being eroded. I intuitively knew that something was wrong, but in way did I assume that Walgreen's was in any way culpable.

Ironically, I had recently been to a Walgreen's meeting where Kermit Crawford insisted that Walgreen's needn't worry about insurance contract issues because they had connections with the DOD. While doing this research I was excruciatingly aware of both Pembroke's and Walgreen's DOD connections given the DOD's reach into dangerous military and clandestine operations.

Even though I had done nothing wrong, the DOD connection filled me with a sense of unease that can only be described as a low rolling dread.

Naturally my unease was growing. I was not keen on the notion of going up against the rich and powerful owner/operators of Pembroke, nor did I have any desire or intention of upsetting Walgreens.

I never did speak to the MRO, one John Cametas, that legal right was conspicuously denied me. My requests to do so continued to be ignored.

In the spirit of cooperation, I did provide some medical information to the agency and also established my long-term relationship with the prescribing doctor. A relationship I might add that spanned over 10 years.

I also made a formal request in writing to Pembroke for my drug test results, since they had never been provided to me. Pembroke acknowledged the receipt of my request in an email which I retain to this day, but they refused to send me a copy of my test results because I had forgotten to enclose a check to cover copying expenses. Legal precedent would not look kindly on them for their refusal.

Understand that when any drug test comes into question the accuracy and interpretation of that test are important, so important that it is mandated that an MRO make the final determination. In the past it was not uncommon for an MRO to report a positive drug test as negative if the drug in question was obtained from a family member and the employee had the same diagnosis because it is so very common. As well there are numerous OTC medications that can result in false positives.

Anyone subjected to drug testing has a legal right to due diligence and due process of law, not only because a bad report could lead to job loss, but also because such outcomes stand to damage the individual's reputation with co-workers, bosses, future employers and the community. Because of my standing in the community and my profession I stood to lose even more, none of this was lost on me at the time, it only further impressed upon me the necessity of fair play, due diligence and due process of law. These decisions do not exist in a vacuum, they have far reaching implications that have the potential to ruin careers, livelihoods, and by extension families.

Side note: There was a story on the news about a lawyer who was found passed out in her car due to opioid use. The officer opted to get the woman help rather than arresting her because he didn't feel that the incident should ruin her life-long career.

The last day I worked at Walgreen's I received a phone call from Pembroke Medical at which time they informed me they didn't consider the documentation I had provided adequate.

I again requested to speak to the MRO. My request this time was met with an odd response. Instead of acknowledging my request the woman on the phone insisted that I had spoken with the MRO, Dr. Cametas, and continued to do so over my objections to the contrary, she was trying to shove her version of events down my throat.

Why would an agent acting on Pembroke's behalf insist that I had spoken to the MRO after I had made it clear that I had not? Could it be because Pembroke Medical understood the significance of having denied me that right?

I once again requested to speak with the MRO. The woman on the other end of the line stated, "I don't care that you didn't speak to the MRO, I'm going to report your drug test to the company as positive anyway." I'll never forget that moment. That is how the phone call ended.

Keep in mind that the conversation was spirited and as such I was acutely aware of the lack of confidentiality, I had no privacy, this news was conveyed via phone to me while I was in the pharmacy so I had to wonder what my co-workers had overheard.

I had no way of knowing that my expectation of confidentiality would be totally destroyed by what occurred shortly afterwards, upon the arrival of my district manager, Krystal Chisholm.

Keep in mind that at this point I still hadn't received the results of my drug test and they had not been confirmed by an MRO. Furthermore, I had been blatantly denied my legal rights of due diligence and due process. Up until Ms. Chisholm arrived, I was not certain if the drug test given by Pembroke had been represented as DOT compliant, remember all of these things had occurred under a veil of secrecy.

I recalled seeing a store manager with a booklet marked IMPACT, I now know it was a guide to set up employee drug awareness programs and would have required full disclosure of company drug testing policies, why Walgreen's had done the complete opposite and treated it like a state secret is beyond me.

When Ms. Chisholm arrived she came into the pharmacy, placed her hand on my arm, and formally escorted me out of the pharmacy, that was the moment I knew for sure that the drug test had to be compliant with DOT regulations, because

DOT regulations stipulate that the employee must be formally escorted off the premises to ensure they do not pose a danger to public safety.

I was publicly humiliated in front of my co-workers, my reputation sullied, based on an unverified drug test administered by an illegal contracting agency. These are the facts of the case, they are undisputable.

I was told to return the next day at 10 am for a meeting.

It's vitally important that I impress upon you the reason for DOT testing of persons in sensitive jobs which include healthcare professionals. All of the job positions mandated by federal law as subject to DOT drug testing regulations are jobs that if not performed accurately or correctly have the potential to endanger public safety. DOT drug testing regulations are strict by necessity. The federal gov't takes infractions regarding these tests seriously. These protections were intended to do two things, 1) protect an employee's career and reputation by enforcing strict guidelines to ensure accuracy 2) To protect the public's safety. Any impairment that impacts a person in their performance of their duties that could endanger the public is taken very seriously.

Furthermore, any contractor that knowingly violates these regulations is deemed illegal, and any company that knowingly misrepresents their business as DOT compliant when it is not is in egregious violation of the law because it constitutes a blatant disregard for public safety and criminal negligence. Companies are not only held answerable to the federal gov't, they are answerable to the general public. Walgreens violated DOT regulations by failing to be transparent about their drug testing program with their employees, but was their failure to do so based on Pembroke's guidance? And does it matter?

The following day when I met with Walgreens, after I had answered their questions, I was presented with a last chance agreement and told that if I did not sign the agreement, I would lose my job. I had no legal representation and I was led to believe I had to make the decision right then.

Because of Pembroke's gross negligence I had been denied my legal rights in the days leading up to this meeting, so I was already under considerable duress. The LCA contract presented to me did not list any material misconduct like performance issues or being impaired on the job, it only cited the positive drug test for cause. I signed because I did not want to lose my job.

Legal scholars point out that Last Chance Agreements are disciplinary actions implying material misconduct by the employee so basing one on a positive drug

test result alone amounts to punishing someone for having a potential addiction: a disability under the American's With Disabilities Act.

During the interview, Wendy Jansen revealed to me that she had accessed my prescription information. She did so without obtaining my permission first and as such it is a HIPPA violation.

After I had signed I made a point to re-emphasize to Walgreen's 1) I had not been given my test results 2) I had not spoken to an MRO 3) I indicated that my dealings with Pembroke were so suspect that Walgreen's should investigate them 4) I informed them that the company could be liable.

At no time did I threaten Walgreen's with a lawsuit, nor was that my intention.

I thought things had gotten as bad as they could get, turns out I was wrong.

Whether Walgreen's investigated Pembroke I will never know, what I do know is that their failure to address my concerns and offer me an official means to dispute the drug test constituted a breach of the LCA contract I had signed.

The terms of the LCA included that I be examined by a SAP (Substance Abuse Professional). DOT guidelines specify that the SAP be chosen at random by the employee. SAP's often have advanced medical training in psychological practices and are represented as trusted healthcare professionals provided by the company to evaluate whether you have a substance abuse problem, suggest and/or offer you appropriate treatment and by extension care for your well-being.

One or two weeks after signing the last chance agreement I was contacted by the SAP and arranged to meet her at her office.

The SAP's name was Dana Carney, (although at a later date she would use a different name) Through research I determined that Ms. Carney had a DUI, was an agent of Pembroke Medical, and was likely related to a prominent political family in Delaware.

Sound familiar?

As soon as I arrived at her office, I knew something was wrong. Instead of the usual patient information pamphlets about medical conditions, on offer were

lengthily legal documents with disclaimers specifying that in the event of a lawsuit she would not testify, but should the unfortunate condition require her to do so, she had provided a list quoting her hourly rates.

I have been to many doctor and healthcare professionals' offices during my lifetime and not once have I ever encountered anything like this.

I entered her office knowing I was there to be evaluated and with the belief that she was there to help. The bizarre odyssey I had endured up to this point had put me in a state of extreme unease, surely things could not get worse, this woman was here to help me, right?

As soon as the interview began it became apparent that I had been deliberately misled, this woman was not here to evaluate me as I had been told, but instead began to interrogate me.

Her approach was predatory, this was a blatant case of entrapment.

I was not pleased, so for a few moments I turned the tables on her. I had questions of my own. I was able to ascertain for a fact that Ms. Carney had no credentials or training that qualified her to evaluate me for substance abuse. I ascertained that Ms. Carney had seen at least 4 other Walgreen's pharmacists in this capacity, which demonstrated a pattern and direct link between Walgreen's and Ms. Carney.

My immediate reaction was to leave. At this point I asked if I might confer with the individual who had accompanied me, Ms. Carney indicated it was okay, so my colleague and I excused ourselves to consider the situation. In the end I opted to cooperate with Ms. Carney, not because I wanted to, but because it was a condition of my employment and I didn't want to lose my job.

What followed was a 2 ½ hour interrogation, delivered in the manner and tone one might expect from the CIA or any other clandestine government agency. This was followed by two formal tests, one which I believe was Briggs Meyers.

The interview by its set up and design was a deliberate scheme to increase my distress.

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The woman may as well have pointed a gun at my head and pulled the trigger.

Perfidy: °A state or act of violating faith or allegiance; violation of a promise or vow, or of trust reposed; faithlessness; treachery. °Specifically, in warfare, an illegitimate act of deception, such as using symbols like the white flag to gain proximity to an enemy for purposes of attack. synonyms: perfidiousness

Ms. Carney determined that I was not impaired or addicted. There were no company reports indicating that I had exhibited drug addled behavior, my performance had not suffered, so it was determined that I was not impaired and had not endangered the public. Carney recommended only 6 hours of counseling in relation to addiction. I saw a counselor on at least one occasion, but eventually ended up asking if my attendance at AA meetings could be counted towards those 6 hours. At first, I was told no, but eventually they relented and allowed me to count those hours.

A condition of the LCA contract was that I call to check in daily to a call center. Making a phone call daily would not have been problematic under normal conditions. Having been repeatedly denied my legal rights and having endured a form of mental assault akin to psychological warfare, surely things could not get worse, or could they?

My family and my home became even more important to me at this time, they were my safe haven, my home an oasis in the storm.

But even that didn't last. For reasons of brevity I won't tell you everything, but will highlight some pertinent events.

Not long after my meeting with Pembroke Medical's Dana Carney, my family suffered from carbon monoxide poisoning. Everyone was irritable, my boyfriend had become combative, and we all had headaches. Due to my medical background I recognized the symptoms. I hauled the family out of the house, called the gas company from a neighbor's, and notified the fire dept. It was determined that carbon monoxide was pooling around my hot water heater, so I made arrangements to have it replaced.

Not long after I was once again suffering from headaches, irritability, and mental lapses. I was determined to find the causal agent. Surely my symptoms were being caused by some sort of contaminant in my home. I paid a biological company 17 hundred dollars to test my home for biological contaminants thinking it might be mold. My symptoms had worsened, and my boyfriend had on one occasion foamed at the mouth, so now neurotoxic chemical agents had to be considered.

On one trip to the emergency room, due to our symptoms and concerns regarding a chemical agent the entire family was decontaminated, but the causal agent was not determined.

Due to these bizarre events I did not feel like my house was safe to inhabit, so I disrupted my family's routine and schedule by insisting that we go live in a hotel. These conditions were a hardship on my family and added to our distress. Each time we tried to return to the house the symptoms returned or worsened, so back to the hotel we would go.

On another occasion I stopped at a police station because while in my car I had started foaming at the mouth and was concerned that a neurotoxic compound had been placed in my vehicle. On another occasion I went to the ER and was treated for chemical burns.

I never considered that things could get worse, but I was dead wrong.

While at the hotel, I discovered someone had broken into our room while we were out and had left me a warning, directly threatening my 11-year-old son. To this day I still do not know who left that threat, but given the events that led up to the event I have my suspicions

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While all of this was happening, I did my best to make those daily phone calls to the SAP per my ACL contract.

Once again, we returned to our home, once again my symptoms worsened. What was the causal agent? Surely it wasn't carbon monoxide, I had already replaced my hot water heater. I found a carbon monoxide detector and plugged it in, immediately it sounded an alarm. I knew that particulate matter or other contaminants could cause the detector to go off, plus the odds of another carbon monoxide leak had to be astronomical.

The detector was old but I could not take a chance. I hauled my children up out of bed, and they went with me to the local fire department. I had one of the firemen plug the detector in at the fire station, the alarm did not go off. I went back to the house thinking the detector alarm sounding had to be a fluke. I was wrong. The alarm sounded again. I hauled my children and boyfriend outside and called the fire department. Upon their arrival they discovered gas pooling under my furnace so I had the gas company come out and shut off the gas. I replaced the furnace

What are the odds that my family would suffer carbon monoxide poisoning not once but twice? What were the odds that my boyfriend and I would both be exposed to a neurotoxic agent and foam at the mouth? The events that led up to the last chance agreement, coupled with Pembroke Medicals predation and my families poisoning could lead to only one conclusion. My family was in danger, our very lives were at stake.

Yet there was no one I could call. I only had my suspicions, and I had no way to prove who might be responsible.

“Use of chemicals as weapons to poison US citizens is considered a war crime, and those determined to have done so are subject to severe criminal penalties, including death.”

During this time, I had also been contacted by the board because Walgreen’s saw fit to report me for a positive drug test even though I had made them aware that it had not been verified by an MRO. I had given them both the knowledge and opportunity to correct the situation and they had chosen to do nothing. Because of the situation I was not nearly as forthcoming with the board as I might have been.

Furthermore, Walgreen’s reporting me to the board smacked of further retaliation, and the board’s subsequent handling of the investigation only added to my fears.

I made Dan Vandersand, the board inspector, aware of three pertinent facts surrounding the drug test. 1) The drug test shouldn’t have been reported 2) There was something else going on that I did not understand 3) They had threatened my family.

Had the board inspector not acted with prejudice by assuming I was a drug addict and lying, had he taken the fact that my family had been threatened seriously, he

would have understood that my terrified demeanor and unwillingness to elaborate indicated not only a dire situation, but also that my repeated statement, “ I am not interested in a lawsuit,” indicated a potential case, and as such whistleblower protections might be in order.

At the bare minimum he should have known I was being retaliated against by Walgreen’s and he should have taken the necessary steps to protect any information regarding the case from falling into the hands of anyone associated with them, including inspectors and board members. Instead what would follow would only increase my alarm, but that is a discussion, perhaps, for another time.

In addition to several trips to the ER I also ended up hospitalized on at least one occasion. These events resulted in me missing one of those required phone calls that conditioned my employment.

Dana Carney notified Walgreen’s that I was in violation of the contract, and I was fired.

I tried calling Walgreen’s St. Louis central office so I could explain that there were extenuating circumstances, but no one would talk to me, my calls were refused. *(A part of me still believed that Walgreen’s must not have understood the implications of what had occurred, and since I had an expectation of fair play even though I was living in a nightmare I held on to the naive belief that Walgreen’s would acknowledge the mistake and correct it)*

Furthermore, legal precedent would not consider me missing one phone call a material breach of the LCA, especially since I made them aware of extenuating circumstances. I had a legal right to a hearing to dispute Walgreen’s claim I was in breach of the LCA, predictably once again I was denied my legal rights. I would also like to point out that I was terminated without the benefit of an exit interview, the ACL contract was never formally severed.

I called Walgreen’s Deerfield headquarters to express my concerns but none of the men I spoke with took me seriously and at least one of them laughed at me. Since I could not get anyone at Walgreen’s headquarters to listen to me or address my concerns, I made the decision to drive to Chicago. I took my family with me.

Surely if I had a face to face meeting with someone at Walgreen's Deerfield location, they would address my concerns, surely, they would understand that Pembroke's illegal contracting implicated the company, surely the situation would be corrected and I would be un-fired.

I reserved a hotel room at the Hyatt next door to Walgreen's Deerfield headquarters.

I dressed in a suit and prepared to face them. Because my phone calls had proved fruitless, I had no formal appointment scheduled. I was suffering from panic attacks and chest pain. I realized that I could not handle an in-person meeting, so I did the next best thing. I instructed my associate to act as my agent. He entered their headquarters and informed them that he was there on behalf of Mary Ellison, a pharmacist in St. Louis.

They refused to see him.

Upon my return to St. Louis I contacted Walgreen's Deerfield headquarters, my call was shuffled around to several desks, all of them men, who refused to take me seriously. My call was finally answered by a woman. I did not go into great detail, but I did express that I felt I had been fired in error and that my violation of the LCA contract had occurred due to extenuating circumstances as I had been in the hospital. I asked her if Walgreen's would reconsider their decision to fire me. She replied, "They don't usually do that."

Her demeanor was professional, she was the only person in Deerfield to try and address my concerns, and as such she told me I could send proof that I had been hospitalized to her email and she would forward it to someone. I sent proof of my hospitalization but it made no difference.

At no time did Walgreen's offer to address my concerns, I was repeatedly denied my legal right to not only dispute the drug test but formally dispute Walgreen's contention that I had breached the LCA.

I also requested that the record reflect that I had resigned because I had never been fired and did not want it to reflect poorly on my record. Of course, she was happy to oblige, I did not understand the legal implications at the time.

Walgreen's record may reflect that I resigned, but it doesn't change the fact that I was wrongfully terminated.

I want to re-emphasize the implications of Walgreen's failure to address my concerns, what did their hostile retaliation indicate?, as well as their use of the

illegal contractor, Pembroke Medical, in administering the drug tests, as well as the federal government's position regarding DOT drug testing compliance.

To reiterate:

It's vitally important that I impress upon you the reason for DOT testing of persons in sensitive jobs which include healthcare professionals. All of the job positions mandated by federal law as subject to DOT drug testing regulations are jobs that if not performed accurately or correctly have the potential to endanger public safety. DOT drug testing regulations are strict by necessity. The federal govt takes infractions regarding these tests seriously. These protections were intended to do two things, 1) protect an employee's career and reputation by enforcing strict guidelines 2) Protect public safety. Any impairment that impacts a person in their performance of their duties that could endanger the public is taken very seriously. **Furthermore, any contractor that knowingly violates these regulations is deemed illegal, and any company that knowingly misrepresents their business as DOT compliant when it is not is in egregious violation of the law because it constitutes a blatant disregard for public safety. Companies are not only held answerable to the federal govt, they are answerable to the general public.**

Walgreen's and Pembroke's hostile actions of retaliation will be discussed shortly.

To Continue:

Any assertion by Walgreen's that they didn't know they were not DOT compliant is false, any assertion by Walgreen's that they didn't know Pembroke Medical was an illegal contractor is false.

Why? Because I made them aware.

Their central St. Louis division knew. They cannot claim that their executives in Deerfield didn't know. Not only had I expressed my concerns to Deerfield via phone on several occasions, I understood that by driving all the way to their headquarters I had impressed upon them the importance of my message

Walgreen's failure to address Pembroke Medical's violations of DOT drug tests demonstrates that not only were they willing to misrepresent themselves to the federal government as DOT compliant when they were not, but in the face of such egregious violations of DOT regulations, having been informed, their failure to

comply clearly demonstrates a wanton act of endangering the public, and as such constitutes criminal negligence.

The blatant disregard of public safety by Walgreen's is in direct contradiction of what the company stands for.

Through their actions Walgreen's and Pembroke violated multiple federal and state employment laws, violated the False Claims Act, knowingly violated DOT drug testing regulations, violated the Drug Free Workplace Act, violated federal and state contracting laws, and violated multiple federal criminal codes too numerous to list.

During my investigation I also discovered additional violations of federal law and at least two criminal violations of Missouri state law by Walgreen's, but did not include the details here since they were not related to drug testing.

Possible reasons for wrongful termination and retaliation:

I filed a formal complaint with Walgreen's over safety concerns.

Ironically, approximately 6 months prior to being terminated, I had voiced concerns over patient safety. Alarmed by a recent company directive that mandated pharmacists work the drive thru while verifying prescriptions, even when short staffed. The demand was unreasonable given that recent payroll cuts had forced the pharmacy to operate more and more with skeleton crews while simultaneously increasing the number of job duties that pharmacists were responsible for. In my opinion requiring the pharmacist to work the drive thru given current working conditions was a recipe for disaster that would most certainly increase pharmacist error rates and jeopardize patient safety. At the same time the pharmacy manager, Chris Howard, continuously demanded and emphasized that pharmacy staff must meet company profit margin metrics without sane consideration of working conditions or any real regard for patient safety.

I made Chris Howard aware of my safety concerns and told him that under the circumstances I would not work the drive thru while verifying prescriptions. He told me I didn't have a choice. I was so concerned about error rates and safety issues that I went over his head to my district manager, Kristol Chisholm, who

arranged a meeting between the three of us to address the situation. Over Chris Howard's objections Kristol informed him that in light of my safety concerns he could not force me to work drive thru.

After that Chris Howard started nit picking my work, focusing on the slightest infractions and reporting them as errors whenever possible. I'm happy to say that despite this my error rates in relation to the sheer volume of prescriptions I verified remained one of the lowest.

Additionally, he made his displeasure known to me in a subsequent company evaluation, giving me poor marks for job performance, the only bad review I ever received while with the company.

Two health insurance claims, one clearly job related, were filed.

As well, 6-8 months prior to being terminated, there were two claims made on my company provided health insurance.

One for an ER visit, my chief complaint was chest pain.

The other claim was for an office visit to my primary care physician due to job related repetitive injuries which resulted in x-rays of both wrists.

I had knowledge of violations by Pembroke and Walgreen's that could cost them multi-billion-dollar contracts:

I had informed Walgreen's I was aware they were using an illegal contractor; I knew they were in violation of DOT federal drug testing laws and they likely suspected that I knew these violations could cause them multi-billion-dollar govt contracts.

I can only guess at Walgreen's and/or Pembroke Medical's reason for retaliating against me, but it's a reasonable assumption that they did so to intimidate and scare me so badly that should I be considering reporting their EEOC, and federal contracting violations to the authorities I wouldn't do so out of fear.

The following are just some of the intimidation tactics that were used and constitute retaliation:

1) Pembroke reporting a non-verified positive drug test to Walgreens, 2) Walgreen's reporting a non-verified drug test as positive to the board in order to further retaliate, and to inflict maximum damage on my reputation and destroy my career, 3) the use of chemical agents, including neurotoxic chemicals against myself and my family constitutes chemical warfare 4) The predatory use of the SAP, using advanced interrogation techniques and an approach more suited to the CIA or clandestine govt operatives, along with all the previous mentioned tactics constitute psychological warfare 5) death threats against my family also constitute psychological warfare.

All of the things I've listed and other incidences I did not include in this report I suspect were intended to cause me to behave erratically and intended to cause my mental breakdown. Character assassinations are a common tactic used by corrupt organizations to discredit potential witnesses and to neutralize bad publicity. Saddling someone with a positive drug test suggests they are a drug addict and of low moral character. And people who end up in mental wards are just plain crazy so any allegations they make must not be true. After all, crazy people can't be taken seriously can they?

It is important to note that I do not know who was responsible for the death threats or chemical warfare against my family, so while these acts are certainly hostile and retaliatory it is not my intent to suggest that Pembroke or Walgreen's is responsible for these occurrences.

Also it's important to note that I consider the people I worked with on store level to be good people, and I doubt any of them were aware of Walgreen's underhanded dealings. Whatever happened to me was likely due to directives from the top down.

Final thoughts:

Currently Walgreens, CVS, and others are being closely scrutinized for their role in the opioid epidemic. They have been designated as distributors due to the large volumes they dispense. Given the high number of deaths caused by opioids, and the sheer volume of distribution by retail chains, if enough patients suffered injury or wrongful deaths it could be deemed a willful disregard for public safety, and if these retail chains deliberately hid knowledge to that effect it constitutes criminal negligence.

I pray with every fiber of my being that nothing like that happened.

I also know that a preventable mass public poisoning could be classified as a form of chemical warfare, and those that deliberately hid it could be charged as war criminals.

Large retail pharmacy chains, along with others are under the microscope. These companies, along with the corrupt govt regulatory agencies that have allowed them to operate, are increasingly being investigated on multiple levels so any subsequent violation that could endanger the public will not be well received by the courts or the American public.

Corporations, their board members, executive owners, and corrupt individuals in regulatory agencies have consistently demonstrated that they do not value human life unless it is their own.

It is not lost on doctors or consumers that these chain retail pharmacies subject their employees to inhumane working conditions, and do not care about errors or public safety, and yet they are allowed to continue to operate.

These companies hammer it home every time they make a generic public statement that is so false that it is laughable. Every proclamation of, "We will admit no wrong doing," is just another nail in the coffin of public opinion.

If large retail drugstore chains as well as those who profited the most from the opioid epidemic think the publicity is bad now, just wait until they are exposed for making an untold number of errors across all drug classes that have harmed or killed so many patients it's deemed endangering the public. This time the people won't buy that they didn't know. This time mass poisonings will be viewed as a

form of chemical warfare against innocent citizens. There won't be any addicts to blame this time around.

The potential victims are every man, every woman, and every child.

Increasingly, the people investigating these corrupt individuals and corporations are every man and every woman, they are anonymous.

Should you ask anyone who they are this is the answer you will receive, "Could be anybody."

The American public isn't stupid, we know corporations routinely throw their innocent employees under the bus. We know the CEOs and C suite executives and company owners are the real decision makers and culprits. And should the federal government charge these people as war criminals it will be just. Brands and family names will be destroyed, forever associated with chemical warfare. These families can run but they will not be able to hide because all nations will hunt them. Those that dehumanized will be dehumanized.

The too big to fail was just an illusion.

Change is on the horizon, are you ready?

Sincerely,

Mary M. Ellison

Sept. 25th, 2020

Further reading:

- Suspension and debarment are per se determinations of non-responsibility
 - o Debarment: contractor excluded for specific period generally not exceeding three years
 - o Suspension: temporary disqualification pending resolution of an investigation, indictment or civil trial. May not exceed 18 months unless legal proceedings initiated within this period

• } **Causes for suspension/debarment (listed in FAR 9.406-2, 9.407-2) include:**

- o Commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public contract or subcontract
- o Commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, tax evasion violating federal criminal tax laws, or receiving stolen property
- o Commission of any other offense indicating a lack of business integrity or honesty that seriously and directly affects the contractor's present responsibility

} Civil False Claims Act (FCA), 31 USC §§ 3729 et seq.

- o Makes liable “[a]ny person who knowingly presents, or causes to be presented, a false or fraudulent claim for payment or approval,” or who, “knowingly makes, uses, or causes to be made or used, a false record or statement material to a false or fraudulent claim” to the Government
- o Requires defendant acted “knowingly”
 - Defined by FCA as: (1) having actual knowledge that a claim is false; (2) acting in deliberate ignorance of the truth or falsity of the information; or (3) acting in reckless disregard of the truth or falsity of the information. No specific intent to defraud is required
- o Treble Damages and penalties

