

**BEFORE THE BOARD OF PHARMACY EXAMINERS  
OF THE STATE OF IOWA**

---

Re:	)	Case No. 2003-26
Pharmacy License of	)	
<b>ALLISON PHARMACY</b>	)	<b>STATEMENT OF CHARGES</b>
License No. 828	)	
Respondent	)	

---

**COMES NOW**, the Complainant, Lloyd K. Jessen, and states:

1. He is the Executive Secretary/Director for the Iowa Board of Pharmacy Examiners and files this Statement of Charges solely in his official capacity.
2. The Board has jurisdiction in this matter pursuant to Iowa Code Chapters 155A and 272C (2003).
3. Effective January 1, 2003, the Board renewed Respondent general pharmacy license number 828 with Randy Moad as pharmacist in charge, allowing Respondent to engage in the operation of pharmacy subject to the laws of the State of Iowa and the rules of the Board.
4. General pharmacy license number 828 is current until December 31, 2003.
5. Respondent is currently operating a general pharmacy at 305 North Main, Allison, Iowa, with Randy Moad as the pharmacist in charge.

**A. CHARGES**

**COUNT I – LACK OF PROFESSIONAL COMPETENCY**

Respondent is charged under Iowa Code § 155A.15(2) (2003) and 657 Iowa Administrative Code § 36.1(4) with a lack of professional competency as demonstrated by willful and repeated departures from, and a failure to conform to, the minimal standard and acceptable and prevailing practice of pharmacy in the state of Iowa.

**COUNT II – FAILURE TO PROVIDE PATIENT COUNSELING**

Respondent is charged under Iowa Code § 155A.15(2) (2003) and 657 Iowa Administrative Code § 6.14 and 36.1(4)(i) with a failure to provide patient counseling and instruction.

COUNT III – IMPROPER DELEGATION OF PHARMACIST FUNCTIONS

Respondent is charged under Iowa Code § 155A.15(2) (2003) and 657 Iowa Administrative Code §§ 6.7(3) and 36.1(4)(i) and (l) with the improper delegation, to supportive personnel, of pharmacist functions such as filling, providing final verification of and dispensing prescriptions.

COUNT IV – EMPLOYMENT OF PERSONS UNLAWFULLY PERFORMING PHARMACY TECHNICIAN FUNCTIONS

Respondent is charged under Iowa Code § 155A.15(2) (2003) and 657 Iowa Administrative Code §§ 36.1(4)(l) and 36.1(4)(aa) with aiding and employing persons not registered as pharmacy technicians to assist pharmacists with technical functions associated with the practice of pharmacy.

B. CIRCUMSTANCES

On or about March 26, 2003 an investigation was commenced which revealed the following:

1. Randy and Jean Moad own and operate six pharmacies under the corporate name Allimont, Inc. One of these pharmacies, the Respondent herein, is located in Allison, Iowa. To operate as a pharmacy, Respondent primarily employs one pharmacy technician and clerks. The pharmacist-in-charge is Randy Moad.
2. A routine examination of pharmacy activities at the Respondent revealed that clerks take phone orders for prescriptions and dispense prescription drugs outside of the presence of a pharmacist, without a pharmacist providing the required patient counseling.
3. The examination also revealed that no policies for shipping and delivering prescription drugs are available at the Respondent, and that refrigeration devices are not maintained at an appropriate temperature.

WHEREFORE, the Complainant prays that a hearing be held in this matter and that the Board take such action as it may deem to be appropriate under the law.

  
Lloyd K. Jessen  
Executive Secretary/Director

On this 29 day of July, 2003, the Iowa Board of Pharmacy Examiners found probable

cause to file this Statement of Charges and to order a hearing in this case.

A handwritten signature in black ink that reads "Katherine A. Linder". The signature is written in a cursive style with a horizontal line underneath it.

Katherine A. Linder, Chairperson  
Iowa Board of Pharmacy Examiners  
400 SW Eighth Street, Suite E  
Des Moines, Iowa 50309-4688

cc: Scott M. Galenbeck  
Assistant Attorney General  
Hoover State Office Building  
Des Moines, Iowa 50319

**BEFORE THE BOARD OF PHARMACY EXAMINERS  
OF THE STATE OF IOWA**

Re:

Pharmacy License of )

**ALLISON PHARMACY** )

License No. 828 )

Respondent )

Case No. 2003-26

**STIPULATION**

**AND**

**CONSENT ORDER**

Pursuant to Iowa Code §§ 17A.10 and 272C.3(4) (2003), The Iowa Board of Pharmacy Examiners (hereinafter, the "Board") and Allison Pharmacy (hereinafter, "Respondent") have agreed to settle a contested case currently on file with the Iowa Board of Pharmacy Examiners. The Statement of Charges filed against Respondent on July 29, 2003, and the licensee disciplinary proceeding shall be resolved without a hearing, as the Board and Respondent have agreed to the following Stipulation and Consent Order:

1. Respondent's license to operate a pharmacy was renewed December 26, 2002 as evidenced by Pharmacy License Number 988, which is recorded in the permanent records of the Iowa Board of Pharmacy Examiners.
2. General Pharmacy License Number 828 issued to and currently held by Respondent is current and in force until December 31, 2004.
3. The Iowa Board of Pharmacy Examiners has jurisdiction over the parties and the subject matter herein.
4. A Statement of Charges was filed against Respondent July 29, 2003.
5. Respondent does not contest the allegations set forth in the Statement of Charges and acknowledges that the allegations, if proven in a contested case proceeding,

constitute grounds for the suspension of its license to operate a pharmacy in the State of Iowa.

6. Respondent's license shall be placed on probation for three (3) years, upon the following conditions:

a. Within sixty (60) days after the date of the Board's approval of this Stipulation and Consent Order, Respondent will propose to the Board *typewritten* pharmacy policies and procedures for the following: (1) education of technicians regarding the appropriate technician role in a pharmacy, (2) instruction of all pharmacy personnel, including relief pharmacists, regarding limitations on technician activity and (3) procedures for patient counseling. Following review and approval by the Board, the Respondent agrees to adopt, implement, and adhere to these policies and procedures.

b. During probation, Respondent shall file sworn quarterly reports with the Board attesting to Respondent's compliance with the terms and conditions of this Stipulation and Consent Order. The reports shall be filed not later than December 5, March 5, June 5 and September 5 of each calendar year. Respondent's quarterly reports shall identify the current pharmacist in charge, all staff pharmacists, *Respondent's most recent efforts to implement the provisions of this Stipulation and Consent Order, by date*, and any further information deemed necessary by the Board from time to time.

7. Respondent agrees to obey all federal and state laws, rules, and regulations substantially related to the operation of pharmacy.

8. Should Respondent violate or fail to comply with any of the terms or conditions of this Stipulation and Consent Order, the Board may initiate action to revoke or suspend Respondent's Iowa license to operate a pharmacy or to impose other licensee discipline as authorized by Iowa Code chapters 272C and 155A and 657 Iowa Administrative Code § 36.1.

9. This Stipulation and Consent Order is the resolution of a contested case. By entering into this Stipulation and Consent Order, Respondent waives all rights to a contested case hearing on the allegations contained in the Statement of Charges, and waives any objections to this Stipulation and Consent Order.

10. This proposed settlement is subject to approval by a majority of the full Board. If the Board fails to approve this settlement, it shall be of no force or effect to either party. If the Board approves this Stipulation and Consent Order, it shall be the full and final resolution of this matter.

11. The Board's approval of this Stipulation and Consent Order shall constitute a **FINAL ORDER** of the Board in a disciplinary action.

This Stipulation and Consent Order is voluntarily submitted by Allison Pharmacy to the Iowa Board of Pharmacy Examiners for its consideration on this 19<sup>th</sup> day of May 2007.

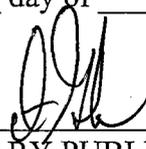
4



Allison Pharmacy  
By Randy L. Moad, R.Ph.  
Pharmacist in charge,  
for Respondent

Subscribed and sworn to before me by Randy L. Moad, who has stated to me that he is the pharmacist in charge of Allison Pharmacy and that he is authorized to sign this Stipulation and Consent Order on behalf of Allison Pharmacy on this 19<sup>th</sup> day of May 2004.

☆ Iowa Notarial Seal ☆  
Quintin A. Goeke  
My Commission No. 198341  
Expires 9/9/04

  
\_\_\_\_\_  
NOTARY PUBLIC IN AND FOR THE  
STATE OF IOWA

This Stipulation and Consent Order is accepted by the Iowa Board of Pharmacy Examiners on this 13 day of July 2004.

  
\_\_\_\_\_  
MICHAEL J. SEIFERT, Chairperson  
Iowa Board of Pharmacy Examiners  
400 SW Eighth Street, Suite E  
Des Moines, Iowa 50309-4688

cc: Scott M. Galenbeck  
Assistant Attorney General  
Office of the Attorney General  
Hoover State Office Building  
Des Moines, Iowa 50319

Quint Goeke  
109 North Main  
P.O. Box 400  
Clarksville, Iowa 50619

Allison Pharmacy-settlement.doc

**BEFORE THE BOARD OF PHARMACY STATE OF IOWA**

---

**IN THE MATTER OF THE STIPULATION AND CONSENT ORDER AGAINST  
ALLISON PHARMACY, RESPONDENT**

**2003-26**

---

**TERMINATION ORDER**

---

**DATE: July 13, 2007**

1. On July 13, 2004, a Stipulation and Consent Order was issued by the Iowa Board of Pharmacy placing Respondent's license, number 828 issued to Allison Pharmacy, on probation for a period of three years under certain terms and conditions.

2. Respondent has successfully completed the probation as directed.

3. The Board directed that the probation placed upon the Respondent's license to practice pharmacy should be terminated.

**IT IS HEREBY ORDERED:**

That the probation placed upon the Respondent's license to practice pharmacy is terminated, and the license is returned to its full privileges free and clear of all restrictions.

**IOWA BOARD OF PHARAMCY**

  
Paul Abramowitz, Board Chairperson  
400 SW 8<sup>th</sup> Street, Suite E  
Des Moines, Iowa 50309-4688

**BEFORE THE BOARD OF PHARMACY STATE OF IOWA**

---

**IN THE MATTER OF THE STIPULATION AND CONSENT ORDER AGAINST  
ALLISON PHARMACY, RESPONDENT**

---

**TERMINATION ORDER**

---

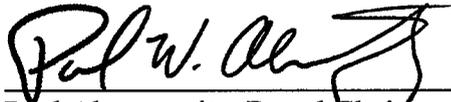
**DATE: July 16, 2007**

1. On July 14, 2004, a Stipulation and Consent Order was issued by the Iowa Board of Pharmacy placing the license to operate a pharmacy, number 929 issued to Allison Pharmacy, on probation for a period of three years under certain terms and conditions.
2. Respondent has successfully completed the probation as directed.
3. The Board directed that the probation placed upon the Respondent's license to practice pharmacy should be terminated.

**IT IS HEREBY ORDERED:**

That the probation placed upon the Respondent's license to operate a pharmacy is terminated, and the license is returned to its full privileges free and clear of all restrictions.

**IOWA BOARD OF PHARAMCY**



---

Paul Abramowitz, Board Chairperson  
400 SW 8<sup>th</sup> Street, Suite E  
Des Moines, Iowa 50309-4688

**BEFORE THE IOWA BOARD OF PHARMACY**

---

Re:	)	Case No. 2011-129, 2011-135,
Pharmacy License of	)	2011-171, and 2012-42
<b>ALLISON PHARMACY</b>	)	
License No. 828,	)	<b>STATEMENT OF CHARGES</b>
Respondent.	)	<b>&amp; NOTICE OF HEARING</b>
	)	

---

**COMES NOW** the Iowa Board of Pharmacy (Board) and files this Notice of Hearing and Statement of Charges pursuant to Iowa Code sections 17A.12(2) and 17A.18(3). Respondent was issued Iowa pharmacy license number 828. Respondent's pharmacy license is active and will expire on December 31, 2013.

**A. TIME, PLACE, AND NATURE OF HEARING**

Hearing. A disciplinary contested case hearing shall be held on March 12, 2013, before the Iowa Board of Pharmacy. The hearing shall be held during the afternoon hearing session, beginning at 1:00 p.m. and shall be located in the Board conference room located at 400 S.W. 8<sup>th</sup> Street, Des Moines, Iowa.

Presiding Officer. The Board shall serve as presiding officer, but the Board may request an Administrative Law Judge from the Department of Inspections and Appeals make initial rulings on prehearing matters, and be present to assist and advise the board at hearing.

Hearing Procedures. The procedural rules governing the conduct of the hearing are found at 657 Iowa Administrative Code 35.19. At hearing you will be allowed the opportunity to respond to the charges against you, to produce evidence on your behalf, cross-examine witnesses, and examine any documents introduced at hearing. You may appear personally or be represented by counsel at your own expense. The hearing may be open to the public or closed to the public at your discretion.

Prosecution. The office of the Attorney General is responsible for representing the public interest (the State) in this proceeding. Pleadings shall be filed with the Board and copies should be provided to counsel for the State at the following address:

Theresa O'Connell Weeg  
Assistant Attorney General  
Iowa Attorney General's Office  
2<sup>nd</sup> Floor Hoover State Office Building  
Des Moines, Iowa 50319.

Ms. Weeg may also be reached by phone at (515)281-5328 or by e-mail at Theresa.Weeg@iowa.gov.

Communications. You may contact the Board office (515)281-5944 with questions regarding this notice and other matters relating to these disciplinary proceedings. However, you may NOT contact individual members of the Board to discuss these proceedings by phone, letter, facsimile, email, or in person. Board members can only receive information about the case when all parties have notice and an opportunity to participate, such as at the hearing or in pleadings you file with the Board office and serve upon all parties in the case. You may also direct questions relating to settlement of these proceedings to Assistance Attorney General Theresa O'Connell Weeg at (515)281-5328 or at Theresa.Weeg@iowa.gov.

## **B. LEGAL AUTHORITY AND JURISDICTION**

Jurisdiction. The Board has jurisdiction in this matter pursuant to Iowa Code chapters 17A, 147, 155A, and 272C (2011).

Legal Authority. If any of the allegations against you are founded, the Board has authority to take disciplinary action against you under Iowa Code chapters 17A, 147, 148C, and 272C (2011) and 657 Iowa Administrative Code chapter 36.

Default. If you fail to appear at the hearing, the Board may enter a default decision or proceed with the hearing and render a decision in your absence, in accordance with Iowa Code section 17A.12(3) and 657 Iowa Administrative Code rule 35.21.

## **C. CHARGES**

### **COUNT I PROFESSIONAL INCOMPETENCY**

Respondent is charged under Iowa Code Section 147.55(2) and 272C.10(2) (2011); and 657 Iowa Administrative Code 36.1(4)(b), with professional incompetence.

### **COUNT II VIOLATING LAWS RELATED TO REFILL OF PRESCRIPTIONS**

Respondent is charged under Iowa Code Section 155A.15(2)(c) and (d) (2011) and 657 Iowa Administrative Code 36.1(4)(i) and (j) with violating the rules of the Board related to refills of prescription drugs.

COUNT III  
VIOLATING LAWS RELATED TO OPERATION OF PHARMACY

Respondent is charged under Iowa Code Section 155A.15(2)(c) and (d) (2011) and 657 Iowa Administrative Code 8.3(1) with failing to ensure the operations of the pharmacy are in compliance with the law.

**D. FACTUAL CIRCUMSTANCES**

1. Respondent is a licensed pharmacy in the State of Iowa. Respondent's pharmacy license is active and will expire on December 31, 2013.
2. On July 29, 2003, the Board filed formal disciplinary charges against Respondent for lack of professional competency, failure to provide patient counseling, improper delegation of pharmacist functions, and employment of persons unlawfully performing pharmacy technician functions. Respondent was placed on probation for three years subject to a number of terms. The probation terminated July 13, 2007.
3. At all times material to this Statement of Charges, Respondent was operating a general pharmacy in Allison, IA, with Randy Moad as the pharmacist in charge.

***Case #2011-129***

4. At all times material to these Circumstances, Respondent was the owner and the pharmacist in charge at Allison Pharmacy in Allison, IA.
5. On a monthly basis in 2010-2011, Respondent's pharmacy refilled a patient's prescription for Hydrochlorothiazide, a diuretic used for hypertension, without the prescriber's authorization. The patient had not been seen in the prescriber's office since March of 2010, and the prescriber had no record of authorizing the prescription. The prescriber does not give verbal authorization for refills over the phone, nor did the patient's prior prescriber.
6. On a monthly basis in 2010-2011, Respondent's pharmacy refilled a patient's prescription for Synthroid, a medication used to treat hypothyroidism, and Fludrocortisone, a medication used to treat the destruction of the adrenal glands, without the prescriber's authorization. The prescriber had not authorized a prescription since April of 2008. The patient had not been seen in the prescriber's office since December 2010 for an unrelated issue, and the prescriber had no record of authorizing these prescriptions. The prescriber does not give verbal authorization for refills over the phone.
7. On a monthly basis in 2010-2011, and without the prescriber's authorization, Respondent's pharmacy refilled a patient's prescription for Atenolol, a medication used to treat hypertension; Fenofibrate, a medication used to treat

hyperlipidemia; Glipizide, a medication used to treat diabetes; lisinopril a medication used to treat hypertension, and Metformin, a medication used to treat hyperlipidemia. The prescriber had no record of authorizing these prescriptions. The prescriber does not give verbal authorization for refills over the phone.

For this same patient, Respondent's pharmacy also refilled on two occasions, and without the prescriber's authorization, a prescription for Diazepam, a controlled substance used to treat anxiety. The prescriber had no record of authorizing these refills. The prescriber did not give verbal authorization for these refills over the phone.

***Case #2011-135***

8. At all times material to these Circumstances, Respondent was the owner and the pharmacist in charge at Allison Pharmacy in Allison, IA .
9. On multiple occasions in 2009-2011, and without the prescriber's authorization, Respondent's pharmacist in charge refilled a patient's prescription for Lorazepam, a controlled substance used to treat anxiety. The prescriber had no record of authorizing these refills. The prescriber did not give verbal authorization for these refills over the phone.
10. On multiple occasions in 2010-2011, and without the prescriber's authorization, Respondent's pharmacist in charge refilled a patient's prescriptions for Clonazepam, a controlled substance used to treat anxiety; and Alprazolam, a controlled substance used to treat anxiety. The prescriber had no record of authorizing these refills. The prescriber did not give verbal authorization for these refills over the phone.

***Case # 2012-42***

11. At all times material to these Circumstances, Respondent was the owner and the pharmacist in charge at Allison Pharmacy in Allison, IA.
12. On January 9, 2012, Respondent refilled two prescriptions for a patient: Lovastatin 20mg, a drug for treating hypercholesterolemia, and Levothyroxine 88mcg, a drug for treating hypothyroidism. On February 16, 2012, a health care provider noted that a patient had a dangerously elevated thyroid level. Upon investigation by the provider, it was determined the patient had Lovastatin pills in both bottles. Respondent had erroneously dispensed Lovastatin to this patient in a bottle labeled Levothyroxine. The patient had been off the Levothyroxine since January 9, 2012.
13. The health care provider noted two additional dispensing errors had recently been made by Respondent. One of those errors involved a prescription for ciprofloxacin ophthalmic solution for a pediatric patient with conjunctivitis. The

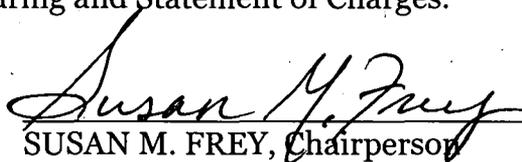
label on that prescription stated the drops were to be placed in the ear instead of the eye.

### E. SETTLEMENT

This matter may be resolved by settlement agreement. The procedural rules governing the Board's settlement process are found at 657 Iowa Administrative Code 36.3. If you are interested in pursuing settlement of this matter, please contact Assistant Attorney General Theresa Weeg.

### F. PROBABLE CAUSE FINDING

On this 16<sup>th</sup> day of January, 2013, the Iowa Board of Pharmacy found probable cause to file this Notice of Hearing and Statement of Charges.



SUSAN M. FREY, Chairperson  
Iowa Board of Pharmacy  
400 SW Eighth Street, Suite E  
Des Moines, Iowa 50309-4688

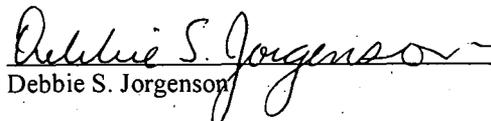
cc: Theresa Weeg  
Assistant Attorney General  
Hoover State Office Building  
Des Moines, Iowa

### PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon Respondent to the above cause by:

- |  |   |
|--|---|
| <input type="checkbox"/> personal service                                    | <input type="checkbox"/> first class mail |
| <input checked="" type="checkbox"/> certified mail, return receipt requested | <input type="checkbox"/> facsimile        |
| Article Number 9171999991703105609764  | <input type="checkbox"/> other _____      |
- on the 17<sup>th</sup> day of January, 2013.

I declare that the statements above are true to the best of my information, knowledge and belief.



Debbie S. Jorgenson

BEFORE THE IOWA BOARD OF PHARMACY

---

Re:	)	Case Nos. 2011-129, 2011-135
Pharmacy License of	)	and 2012-42
<b>ALLISON PHARMACY</b>	)	
License No. 828,	)	<b>SETTLEMENT AGREEMENT</b>
Respondent.	)	<b>AND FINAL ORDER</b>

---

Pursuant to Iowa Code §§ 17A.10 and 272C.3(4) (2011), the Iowa Board of Pharmacy and Allison Pharmacy, Respondent, enter into the following Settlement Agreement and Final Order to settle a licensee disciplinary proceeding currently pending before the Board.

The allegations contained in a Statement of Charges against Respondent shall be resolved without proceeding to hearing, as the Board and Respondent stipulate as follows:

1. Respondent was issued Pharmacy License No. 828. That license is active and current until December 31, 2013.
2. A Statement of Charges was filed against Respondent on January 16, 2013.
3. Respondent was at all times relevant to the Statement of Charges operating a general pharmacy in Allison, Iowa, with Randy Moad as the pharmacist in charge.
4. The Board has jurisdiction over the parties and the subject matter of these proceedings.
5. Respondent has chosen not to contest the allegations in the Statement of Charges

and acknowledges that the allegations, if proven in a contested case proceeding, would constitute grounds for the discipline agreed to in this Order.

6. Respondent agrees that no refills for prescription medications of any kind will be issued by the pharmacy without the appropriate authorization from the prescriber.
7. On the date of the Board's approval of this Settlement Agreement and Final Order, Respondent's license shall be placed on probation for a period of three (3) years, subject to the following terms:
  - a. Respondent shall submit a \$2500.00 civil penalty to the Board. This civil penalty shall be made payable to the Treasurer of Iowa and mailed to the executive director of the Board within twenty (20) days of the date this Settlement Agreement is approved by the Board. All civil penalty payments shall be deposited into the State of Iowa's general fund.
  - b. Respondent shall within sixty (60) days of the date this Settlement Agreement is approved by the Board, submit to the Board for its approval policies and procedures for the following areas of practice. Respondent agrees to comply with these policies and procedures while operating its pharmacy.
    - i. Refilling prescription medications
    - ii. Refilling controlled substance prescriptions
    - iii. Avoiding dispensing errors

- c. Respondent shall comply with all applicable Iowa pharmacy law and rules and all related federal requirements for controlled substances while operating its pharmacy.
  - d. Respondent shall submit quarterly reports to the Board. The reports shall be filed not later than December 5, March 5, June 5 and September 5 of each calendar year. These reports shall include a narrative discussing Respondent's current compliance with the terms of this Settlement Agreement and Final Order and any other information requested by the Board.
  - e. Only the periods of time during which Respondent is actively operating a pharmacy in Iowa shall apply to the duration of the probation, unless otherwise approved by the Board.
8. Should Respondent violate or fail to comply with any of the terms and conditions of this Settlement Agreement and Final Order, the Board may initiate action to revoke or suspend Respondent's Iowa pharmacy license or to impose other licensee discipline as authorized by Iowa Code chapters 272C and 155A (2011) and 657 IAC 36.
9. This Settlement Agreement and Final Order is the resolution of a contested case. By entering into this Settlement Agreement and Final Order, Respondent waives all rights to a contested case hearing on the allegations contained in the Statement of Charges, and waives any objections to this Final Order.
10. The State's legal counsel may present this Settlement Agreement and Final Order to the Board.

11. This Settlement Agreement and Final Order is subject to approval by a majority of the full Board. If the Board fails to approve this settlement, it shall be of no force or effect to either the Board or Respondent. If the Board approves this Settlement Agreement and Final Order, it shall be the full and final resolution of this matter.
12. The Board's approval of this Settlement Agreement and Final Order shall constitute a FINAL ORDER of the Board.

This Settlement Agreement and Final Order is voluntarily submitted by Respondent to the Board for its consideration on the \_\_\_\_ day of \_\_\_\_\_ 2013.

  
\_\_\_\_\_  
ALLISON PHARMACY, Respondent  
By Randy Moad, R.Ph.  
Pharmacist in Charge

By his signature Randy Moad acknowledges he is the pharmacist in charge of Leeds Pharmacy and is authorized to sign this Settlement Agreement and Final Order on behalf of Allison Pharmacy.

This Stipulation and Consent Order is accepted by the Iowa Board of Pharmacy on the 26 day of June 2013.

  
\_\_\_\_\_  
~~SUSAN M. FREY~~, Chairperson  
Iowa Board of Pharmacy  
400 SW Eighth Street, Suite E  
Des Moines, Iowa 50309-4688

cc: Theresa O'Connell Weeg  
Assistant Attorney General  
Office of the Attorney General  
Hoover State Office Building  
Des Moines, Iowa 50319