

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

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Re: )  
Pharmacy Technician Registration of: )  
**DARLA A. CARTER** ) **STATEMENT OF CHARGES**  
Registration No. 2422 )  
Respondent )

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**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 (1999).
3. On January 1, 1998, the Board issued Respondent, Darla A. Carter, pharmacy technician registration number 2422 to be registered as a pharmacy technician, subject to the laws of the State of Iowa and the rules of the Board.
4. Registration number 2422 is current and active until April 30, 2000.
5. Respondent's current address is 1552 Washington, Muscatine, IA 52761.
6. Respondent is currently employed as a pharmacy technician at Wal-Mart Pharmacy in Muscatine, Iowa .

COUNT I

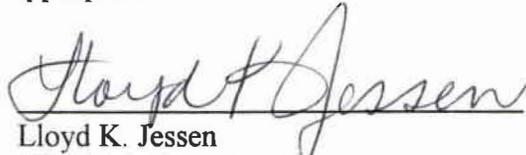
The Respondent is charged under Iowa Code § 155A.6(7) (1999) and 657 Iowa Administrative Code §§ 36.1(4)(a) & 22.18 with falsifying her application for pharmacy technician registration.

THE CIRCUMSTANCES

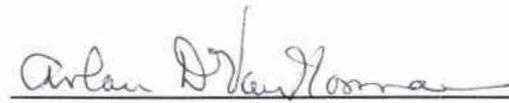
1. Respondent made an Application for Pharmacy Technician Registration to the Board of Pharmacy Examiners dated December 17, 1997.

2. On Respondent's Application for Pharmacy Technician Registration she answered "no" to the question, "Have you ever been charged, convicted, found guilty of, or entered a plea of guilty to a felony or misdemeanor crime?"
3. Investigative information received by the Board indicates that the Respondent was convicted of possession of cocaine with intent to deliver in violation of Iowa Code § 204.401(1)(a) and she received an indeterminate sentence of ten years for the conviction on July 14, 1989.

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 16<sup>th</sup> day of July, 1999, the Iowa Board of Pharmacy Examiners found probable cause to file this Statement of Charges and to order a hearing in this case.

  
Arlan D. VanNorman, Chairperson  
Iowa Board of Pharmacy Examiners  
1209 East Court Avenue  
Des Moines, Iowa 50319

cc: Shauna Russell Shields  
Assistant Attorney General  
Hoover State Office Building  
Des Moines, Iowa 50319

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

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Re:	)	Case No. 99-2422
Pharmacy Technician Registration of	)	
<b>DARLA A. CARTER</b>	)	<b>STIPULATION</b>
Registration No. 2422	)	<b>AND</b>
Respondent	)	<b>CONSENT ORDER</b>
	)	

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COME NOW the Iowa Board of Pharmacy Examiners (“the Board”) and Darla A. Carter, (“Respondent”) and, pursuant to Iowa Code §§ 17A.10 and 272C.3(4) (1997), enter into the following Stipulation and Consent Order settling the contested case currently on file:

The licensee disciplinary hearing pending before the Iowa Board of Pharmacy Examiners, on the allegations specified in the Statement of Charges filed against Respondent on July 16, 1999, shall be resolved without proceeding to hearing, as the parties have agreed to the following Stipulation and Consent Order:

1. That Respondent was issued a pharmacy technician registration on January 1, 1998, as evidenced by Pharmacy Technician Registration Number 2422, which is recorded in the permanent records of the Iowa Board of Pharmacy Examiners.
2. That Iowa Pharmacy Technician Registration Number 2422, issued to and held by Respondent is active and current until April 30, 2000.
3. Respondent is currently employed as a pharmacy technician at Wal-Mart Pharmacy in Muscatine, Iowa.

4. A Statement of Charges was filed against Respondent on July 16, 1999.
5. That the Iowa Board of Pharmacy Examiners has jurisdiction over the parties and the subject matter herein.
6. Respondent does not contest the allegations set forth in the Statement of Charges.
7. Respondent agrees to accept a citation and warning for the alleged violation set forth in the Statement of Charges.
8. The Respondent shall obey all federal and state laws, rules, and regulations substantially related to prescription drugs, controlled substances, or nonprescription drugs; with Iowa Code Chapters 124, 124A, 124B, 126, 147, and 205; and shall comply with the Board's rules.
9. 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 the Respondent's Iowa pharmacy technician registration or to impose other registrant discipline as authorized by Iowa Code chapters 272C and 155A and 657 IAC 36.1.
10. 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.
11. 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

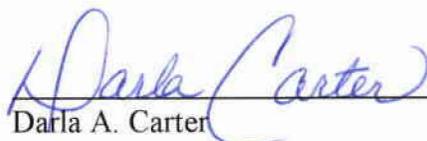
and final resolution of this matter.

12. 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.

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

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14. This Stipulation and Consent Order is voluntarily submitted by Respondent to the Board for its consideration on the 10<sup>th</sup> day of September, 1999.

  
\_\_\_\_\_  
Darla A. Carter  
Respondent

Subscribed and sworn to before me by Darla A. Carter on this 10<sup>th</sup> day of September, 1999.



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

15. This Stipulation and Consent Order is accepted by the Iowa Board of Pharmacy Examiners on the 15<sup>th</sup> day of Sept., 1999.

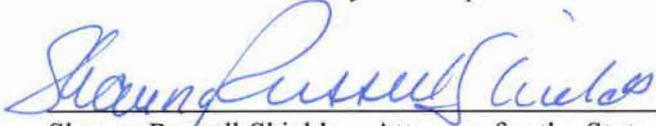
  
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ARLAN D. VAN NORMAN, Chairperson  
Iowa Board of Pharmacy Examiners  
Executive Hills West

1209 East Court Avenue  
Des Moines, Iowa 50319

APPROVED AS TO FORM:



Ester J. Dean – Attorney for Respondent



Shauna Russell Shields – Attorney for the State

cc: Ester J. Dean  
1102 Park Avenue  
Muscatine, Iowa 52761

Shauna Russell Shields  
Assistant Attorney General  
Office of the Attorney General  
Hoover State Office Building  
Des Moines, Iowa 50319