

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

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Re: )  
Pharmacist License of )  
**RALPH CROXDALE** ) **STATEMENT OF CHARGES**  
License No. 16185 )  
Respondent )

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**COMES NOW**, the Complainant, Lindy A. Pearson, and states:

1. She is the Chief Investigator for the Iowa Board of Pharmacy Examiners and files this Statement of Charges solely in her official capacity.
2. The Board has jurisdiction in this matter pursuant to Iowa Code Chapters 155A and 272C (1995).
3. On August 10, 1982, Ralph Croxdale, the Respondent, was issued license number 16185 by the Board to engage in the practice of pharmacy, subject to the laws of the State of Iowa and the rules of the Board.
4. License number 16185 is current and active until June 30, 1996.
5. Respondent's current mailing address is Rural Route 3, Box 292-B, Centerville, Iowa 52544.

**COUNT I**

The Respondent is charged under Iowa Code §§ 155A.12(1), 155A.12(8), and 155A.12(10) (1995) and 657 Iowa Administrative Code §§ 9.1(4)(j) and 9.1(4)(u) with having disciplinary action taken by the Missouri State Board of Pharmacy against his Missouri pharmacist license number 41046 on November 10, 1993.

## COUNT II

The Respondent is charged under Iowa Code § 155A.12(1) (1995) and 657 Iowa Administrative Code §§ 8.5(1), 9.1(4)(a), 9.1(4)(c), and 9.1(4)(k) with making a false statement and failing to report the disciplinary action taken by the Missouri State Board of Pharmacy when filing his Iowa Pharmacist License Renewal Application with the Board on June 15, 1994.

### THE CIRCUMSTANCES

1. On November 10, 1993, Respondent was disciplined by the Missouri State Board of Pharmacy .

2. The Board has received certified copies of the First Amended Complaint titled State Board of Pharmacy v. Ralph Croxdale, No. 92-001570PH, dated June 18, 1993, and an Affidavit of Voluntary Surrender of Pharmacist's License, executed by Ralph Croxdale on November 10, 1993, from the Missouri State Board of Pharmacy.

3. The Affidavit of Voluntary Surrender of Pharmacist's License, executed by Ralph Croxdale on November 10, 1993, provides, in part, the following:

I understand and agree that by voluntary surrender of my pharmacist's license, this license becomes as if it were revoked for purposes of regaining licensure in the State of Missouri.

4. A certified copy of the Affidavit of Voluntary Surrender of Pharmacist's License, executed by Ralph Croxdale on November 10, 1993, , which was received from the Missouri State Board of Pharmacy, is attached hereto as Exhibit 1 and is incorporated by reference into this Statement of Charges as if fully set forth herein.

5. In his Iowa Pharmacist License Renewal Application which Respondent filed with the Board on June 15, 1994, Respondent answered "no" to question number 6: "Have you...had your license suspended, revoked, or disciplined since initial licensure in this or another state?" He also failed to report, on his license renewal application, that disciplinary action had been taken by the

Missouri State Board of Pharmacy against his Missouri pharmacist license number 41046

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.



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Lindy A. Pearson  
Chief Investigator

On this 11th day of October, 1995, the Iowa Board of Pharmacy Examiners found probable cause to file this Statement of Charges and to order a hearing in this case.



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Marian L. Roberts, Chairperson  
Iowa Board of Pharmacy Examiners  
Executive Hills West  
1209 East Court Avenue  
Des Moines, Iowa 50319

cc: Linny Emrich  
Assistant Attorney General  
Office of the Attorney General  
Hoover State Office Building  
Des Moines, Iowa 50319



possible or alleged violations of Chapter 338, RSMo, may be considered in the Board's decision of whether to grant me a new license, and I further understand that licensure may be granted, subject to filing of a new complaint based upon those facts and information and any other allegations or information which may be appropriate at that time. I understand that the Missouri Board of Pharmacy has agreed that in exchange for the voluntary surrender of my pharmacist's license, the Board will not pursue further disciplinary action based upon any facts and information it has acquired until such time as I apply for licensure to practice pharmacy in the State of Missouri.

5. I fully understand that the State Board of Pharmacy will maintain this Affidavit as an open record of the Board pursuant to Sections 338, 610 and 620, RSMo.

6. I fully understand that, by my execution of this Affidavit, I shall surrender and lose any rights under the law to practice as a pharmacist in the State of Missouri and will not be able to again practice pharmacy in the State of Missouri until I reapply for licensure as an original candidate and am accepted by the Missouri Board of Pharmacy.

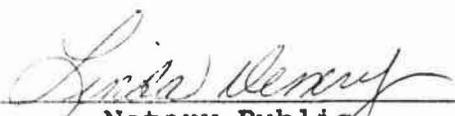
7. I further understand that my license as a pharmacist will not be returned to me by the Missouri Board of Pharmacy upon request, but that license will cease to exist when it is surrendered.

8. I acknowledge and affirm by this sworn statement that no threats, promises, or assurances of any kind have been made to me regarding the voluntary surrender of my license except as noted

above, nor have I been threatened or coerced to so act in any way, but rather, I hereby voluntarily surrender my license as a pharmacist in the State of Missouri by and with this Affidavit.

  
\_\_\_\_\_  
Ralph Croxdale

Subscribed and sworn to before me this 10 day of November, 1993.

  
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Notary Public

(SEAL)



My Commission Expires: "

1-30-94

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

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Re: Pharmacist License of  
**RALPH CROXDALE**  
License No. 16185  
Respondent

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**STIPULATION  
AND  
INFORMAL SETTLEMENT**  
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COMES NOW the Iowa Board of Pharmacy Examiners (the Board) and Ralph Croxdale, R.Ph. (Respondent) and, pursuant to Iowa Code §§ 17A.10 and 272C.3(4) (1995), enter into the following Stipulation and Informal Settlement of the contested case currently on file:

1. Respondent was issued a license to practice pharmacy on the 10th day of August, 1982, by examination, as evidenced by license number 16185, which is recorded in the permanent records of the Board.
2. Iowa Pharmacist License Number 16185 issued to and held by Respondent is current until June 30, 1996.
3. Respondent is currently employed as a pharmacist at the Iowa Veterans Home Pharmacy, 1301 Summit Street, Marshalltown, Iowa.
4. A Statement of Charges and Notice of Hearing was filed against Respondent on October 11, 1995.
5. The Board has jurisdiction over the parties and the subject matter herein.

6. Respondent's license is placed on probation for a period of two (2) years from the date of approval of this Stipulation and Informal Settlement. During the probationary period the Respondent shall:

a. Obey all federal and state laws and regulations substantially related to the practice of pharmacy and the distribution of controlled substances.

b. Report to the Board or its designee quarterly. Said report shall be in writing. The report shall include the Respondent's place of employment, current address, and any further information deemed necessary by the Board from time to time.

c. Provide evidence of efforts to maintain skill and knowledge as a pharmacist through continuing education (CE) as directed by the Board.

d. Not supervise any registered intern and shall not perform any of the duties of a preceptor.

7. Respondent shall not use any controlled substance or prescription drug in any form unless authorized and prescribed for him by a licensed, treating practitioner.

8. Respondent shall notify all present and prospective employers of the resolution of this case and the terms, conditions, and restrictions imposed on Respondent by this document. Within thirty (30) days after approval of this Stipulation and Informal Settlement by the Board, and within fifteen (15) days of undertaking new employment as a pharmacist, Respondent shall cause his pharmacy employer to report to the Board in writing acknowledging that the employer has read this document and understands it.

9. Should Respondent leave Iowa to practice pharmacy outside this State, Respondent shall notify the Board in writing of the dates of departure and return. Periods of practice outside the State shall not apply to reduction of the probationary period.

10. Should Respondent violate probation in any respect, the Board, after giving Respondent notice and an opportunity to be heard, may revoke probation. If a petition to revoke probation is filed against Respondent during probation, the Board shall

have continuing jurisdiction until the matter is final, and the period of probation shall be extended until the matter is final.

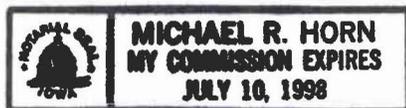
11. Upon successful completion of probation, Respondent's certificate will be fully restored.

12. This Stipulation and Informal Settlement is subject to approval of a majority of the full Board. If the Board approves this Stipulation and Informal Settlement, it becomes the final disposition of this matter. If the Board fails to approve this Stipulation and Informal Settlement, it shall be of no force or effect to either party.

13. This Stipulation and Informal Settlement is voluntarily submitted by the Respondent to the Board for its consideration on the 27<sup>th</sup> day of December, 1995.

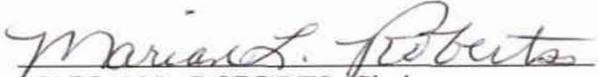
  
\_\_\_\_\_  
RALPH CROXDALE, R.Ph.  
Respondent

Subscribed and Sworn to before me on this 27<sup>th</sup> day of December, 1995.



  
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NOTARY PUBLIC IN AND FOR THE  
STATE OF IOWA

14. This Stipulation and Consent Order is accepted by the Iowa Board of Pharmacy Examiners on the 9 day of January, 1996.



MARIAN L. ROBERTS, Chairperson

Iowa Board of Pharmacy Examiners

Executive Hills West

1209 East Court Avenue

Des Moines, Iowa 50319