

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

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Re:	)	Case No. 2002-109
Pharmacist License of	)	
<b>Chad L. Ronnebaum</b>	)	<b>STATEMENT OF CHARGES</b>
License No. 19201	)	
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 (2001).
3. On July 6, 1999, the Board issued Respondent, Chad Ronnebaum, after examination, a license to engage in the practice of pharmacy as evidenced by license number 866, subject to the laws of the State of Iowa and the rules of the Board.
4. License number 866 is current and active until June 30, 2003.
5. Respondent's current address is 424 Elder Street, Dike Iowa 50624.
6. Respondent was employed as the pharmacist in charge at AdvoCare Pharmacy, 1150 Fifth Street, Coralville, Iowa 52241, at all times material to this statement of charges.

COUNT I

Respondent is charged under Iowa Code §§ 155A.12, 155A.27 (2003) and 657 Iowa Administrative Code §§ 6.2, 6.8, 8.15, 10.18 & 36.1(4) and 21 CFR 1304.11 & 1306.22(b)(3) with inadequate record keeping, including but not limited to failure to maintain controlled substances records in a readily retrievable manner.

## COUNT II

Respondent is charged under Iowa Code §§ 124.308(3), 124.402(1)(a), 155A.15(2)(c), 155A.15(2)(d), and 155A.12 (2003) and 657 Iowa Administrative Code §§ 6.2, 6.7, 6.8, 36.1(4)(u) with failing to maintain adequate security, and accurate control over and accountability for drugs, including controlled substances.

## COUNT III

Respondent is charged under Iowa Code § 155A.12 (2003) and 657 Iowa Administrative Code §§ 10.18, 32.21 and 36.1(4) with a failure to properly dispose of previously dispensed controlled substances, including a failure to properly maintain records of such disposal.

## COUNT IV

Respondent is charged under Iowa Code § 155A.12 (2003) and 657 Iowa Administrative Code §§ 6.2, 6.7 and 36.1(4) with a failure to assure that the pharmacy was adequately staffed and operated by qualified personnel.

## COUNT V

Respondent is charged under Iowa Code § 155A.12 (2003) and 657 Iowa Administrative Code § 36.1(4) with a lack of professional competency, including repeated departure from, or failure to conform to, the minimal standard or acceptable and prevailing practice of pharmacy in the State of Iowa.

## THE CIRCUMSTANCES

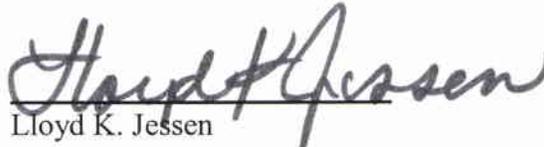
On or about October 10, 2002 an investigation of AdvoCare Pharmacy was conducted, revealing the following:

1. Records regarding the inventory of controlled substances could not be found. Records relating to dispensed controlled substances were incomplete and, in some cases, completely missing.
2. Pharmacist-technicians worked essentially alone in the pharmacy, with a pharmacist dropping in every two hours to check on the technicians and answer questions.
3. Records of controlled substances which had been dispensed to patients, then returned, were incomplete. No records of this type were maintained from September 1, 2001 to March 2002.

4. Controlled substances, intended for eventual destruction, were stored in an unlocked container rather than being destroyed.
5. Adulterated controlled substances were present at the pharmacy.

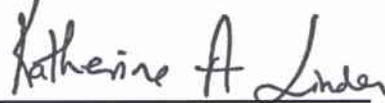
Subsequent to the investigation, AdvoCare was closed and pharmacy operations were transferred to NuCara Pharmacy, located in the same building.

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 23 day of April, 2003, the Iowa Board of Pharmacy Examiners found probable cause to file this Statement of Charges and to order a hearing in this case.



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:

Pharmacist License of  
**CHAD L. RONNEBAUM**  
License No. 19201,

Respondent.

) Case No. 2002-109  
)  
)  
)  
)

) **STIPULATED CITATION**  
) **AND WARNING**  
)  
)

Pursuant to Iowa Code §§ 17A.10 and 272C.3(4) (2003) and 657 I.A.C. 36.1(2)(j), the Iowa Board of Pharmacy Examiners (hereinafter, "the Board") and Chad L. Ronnebaum (hereinafter, "Respondent") enter into the following Stipulated Citation and Warning, settling a licensee disciplinary proceeding currently pending before the Iowa Board of Pharmacy Examiners.

Allegations specified in a Statement of Charges filed against Respondent shall be resolved without proceeding to hearing, as the Board and Respondent stipulate as follows:

1. Respondent was issued a license to practice pharmacy in Iowa on July 6, 1999, after examination, as evidenced by Pharmacist License Number 19201, which is recorded in the permanent records of the Board.
2. The Iowa Pharmacist License issued to and held by Respondent is active and current until June 30, 2005.
3. A Statement of Charges was filed against Respondent on April 23, 2003.
4. Respondent was, at all times material to the Statement of Charges, employed as a pharmacist at AdvoCare Pharmacy, 1150 Fifth Street, Coralville, Iowa 52241, where he served as the pharmacist-in-charge.
5. The Board has jurisdiction over the parties and jurisdiction over the subject matter of these proceedings.

6. For purposes of this Stipulated Citation and Warning only, Respondent does not contest the allegations set forth in the Statement of Charges. Respondent accepts, pursuant to 657 I.A.C. § 36.1(2)(j), this citation and warning for alleged (1) record keeping violations relating to controlled substances, (2) record keeping violations relating to drugs returned for disposal, (3) violations of security standards relating to controlled substances, and (4) inadequacy of staffing at the AdvoCare Pharmacy.

7. Within six (6) months after the date of the Board's approval of this Stipulated Citation and Warning, Respondent shall complete continuing pharmacy education ("CPE") or other formal, structured education in controlled substance record keeping and security, and compliance with controlled substances laws. The CPE shall be *not less than* two (2) hours in length and shall be pre-approved by the Board. Documentation of satisfactory completion of the education shall be promptly submitted to the Board. This CPE shall be in addition to – not in lieu of – the thirty (30) hours of continuing pharmacy education required every two years for license renewal.

8. Within sixty (60) days after the date of the Board's approval of this Stipulated Citation and Warning, Respondent will propose to the Board *typewritten* pharmacy policies and procedures for the following: (1) record-keeping relating to controlled substances, (2) security of controlled substances, (3) delivery of prescription drugs, and (4) patient counseling. Following review and approval by the Board, the Respondent agrees to adopt, implement, and adhere to these policies and procedures or substantially similar procedures in any employment setting in which he is acting as pharmacist in charge of a pharmacy.

9. Should the Respondent violate or fail to comply with any of the terms or conditions of this Stipulated Citation and Warning, the Board may initiate action to revoke or

suspend Respondent's Iowa pharmacist license or to impose other licensee discipline as authorized by Iowa Code Chapters 272C and 155A (2003 and 657 IAC 36.

10. This Stipulated Citation and Warning is the resolution of a contested case. By entering into this Stipulated Citation and Warning, Respondent waives all rights to a contested case hearing on the allegations contained in the Statement of Charges, and waives any objections to this Stipulated Citation and Warning.

11. This proposed settlement is subject to approval by a majority of the full Board. If the Board fails to approve this Stipulated Citation and Warning, it shall be of no force or effect to either the Board or Respondent. If the Board approves this Stipulated Citation and Warning, it shall be the full and final resolution of this matter.

12. The Board's approval of this Stipulated Citation and Warning shall constitute a **FINAL ORDER** of the Board in a disciplinary action.

This Stipulated Citation and Warning is voluntarily submitted by Respondent to the Board for its consideration on the 25 day of May, 2004.



Chad L. Ronnebaum, R.Ph.  
Respondent

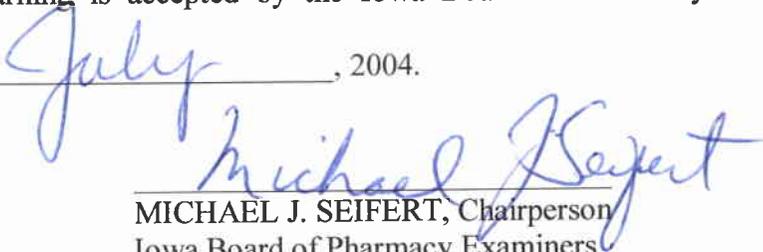
Subscribed and sworn to before me by Chad L. Ronnebaum on this 25 day of May, 2004.



NOTARY PUBLIC IN AND FOR  
THE STATE OF IOWA



This Stipulated Citation and Warning is accepted by the Iowa Board of Pharmacy  
Examiners on the 13<sup>th</sup> day of July, 2004.

  
MICHAEL J. SEIFERT, Chairperson  
Iowa Board of Pharmacy Examiners  
400 SW Eighth Street, Suite E  
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Copies to:

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