

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

Re:)	COMPLAINT
Pharmacist License of)	AND STATEMENT
THOMAS B. STANDARD)	OF CHARGES
License No. 15599)	AND
Respondent)	NOTICE
)	OF HEARING

COMES NOW, Lloyd K. Jessen, Executive Secretary-Director of the Iowa Board of Pharmacy Examiners, on the 21st day of February, 1994, and files this Complaint and Statement of Charges and Notice of Hearing against Thomas B. Standard, a pharmacist licensed pursuant to Iowa Code chapter 155A, and alleges that:

1. Marian L. Roberts, Chairperson; Phyllis A. Olson, Vice Chairperson; Phyllis A. Miller; Mary Pat Mitchell; Matthew C. Osterhaus; and Arlan D. Van Norman are duly appointed, qualified members of the Iowa Board of Pharmacy Examiners.

2. Respondent was issued a license to practice pharmacy in Iowa on July 31, 1979, by reciprocity.

3. Respondent currently resides at 12 Tower Circle, Council Bluffs, Iowa 51503.

4. Respondent was employed as a staff pharmacist at a pharmacy located in Council Bluffs, Iowa, until December 8, 1992.

5. Respondent's license to practice pharmacy in Iowa is current until June 30, 1995.

6. The Board has received investigative information from "G.K." dated December 10, 1992, which alleges that on December 8, 1992, Respondent confessed to dispensing Schedule III controlled substances without a valid prescription and without prescriber authorization. The information also includes the following allegations:

Standard related he was a friend of ... [John Doe] and that they ... were body builders. Standard admitted he had provided a vial of Injectable Testosterone; known as an anabolic steroid; to ... [John Doe]. He also admitted he had also provided a bottle containing 100 each 50mg tablets of Anadrol; also said to be a steroid; to ... [John Doe] without a doctor's prescription... Standard also related that he had also provided ... [another] individual ... testosterone without a doctor's prescription.

Standard further confessed he had dispensed Anexsia to ... [John Doe] without a doctor's prescription on several occasions... Standard related that ... [a] doctor had prescribed Anexsia to ... [John Doe] without any refills and that he [Standard] added refills to ... [John Doe's] patient profile ... on more than one occasion so the drug could be dispensed by any pharmacist anytime ... [John Doe] wanted it. Standard also admitted he had dispensed Zydone to ... [John Doe] under his [John Doe's] wife's name ... [Jane Doe].

7. The Board has also received investigative reports from Board Investigator Morrell A. Spencer dated December 14, 1992, and June 15, 1993, which allege that Respondent diverted Schedule III controlled substances by creating false prescriptions

while employed as a staff pharmacist at a pharmacy located in Council Bluffs, Iowa.

8. The Board has also received investigative reports from a federal agency investigator dated February 3, 1993, and March 15, 1993, which allege that from March 1992 to December 1992 the Respondent supplied "John Doe" with a large quantity of controlled substances (various Schedule III narcotics and anabolic steroids) without a valid prescription.

9. Respondent is guilty of violations of 1993 Iowa Code sections 124.308(3), 124.401(1)(c)(6), 124.402(1)(a), 147.55(2), 147.55(3), 155A.12(1), 155A.12(2), 155A.12(3), 155A.12(4), 155A.12(5), 155A.23(2), and 155A.23(4) by virtue of the allegations contained in paragraphs 6, 7, and 8.

1993 Iowa Code section 124.308 provides, in part, the following:

3. Except when dispensed directly by a practitioner, other than a pharmacy, to an ultimate user, a controlled substance included in Schedule III or IV, which is a prescription drug as determined under chapter 155A, shall not be dispensed without a written or oral prescription of a practitioner. The prescription may not be filled or refilled more than six months after the date thereof or be refilled more than five times, unless renewed by the practitioner.

1993 Iowa Code section 124.401 provides, in part, the following:

1. Except as authorized by this chapter, it is unlawful for any person to manufacture, deliver, or possess with the intent to manufacture or deliver, a

controlled substance, a counterfeit substance, or a simulated controlled substance, or to act with, enter into a common scheme or design with, or conspire with one or more other persons to manufacture, deliver, or possess with the intent to manufacture or deliver a controlled substance, a counterfeit substance, or a simulated controlled substance.

....

c. Violation of this subsection with respect to the following controlled substances, counterfeit substances, or simulated controlled substances is a class "C" felony, and in addition to the provisions of section 902.9, subsection 3, shall be punished by a fine of not less than one thousand dollars nor more than fifty thousand dollars:

....

(6) Any other controlled substance, counterfeit substance, or simulated controlled substance classified in schedule I, II, or III.

1993 Iowa Code section 124.402 provides, in part, the following:

1. It is unlawful for any person:
 - a. Who is subject to division III to distribute or dispense a controlled substance in violation of section 124.308.

1993 Iowa Code section 147.55 provides, in part, the following:

A license to practice a profession shall be revoked or suspended when the licensee is guilty of any of the following acts or offenses:...

2. Professional incompetency.

3. Knowingly making misleading, deceptive, untrue or fraudulent representations in the practice of a profession or engaging in unethical conduct or practice harmful or detrimental to the public. Proof of actual injury need not be established.

1993 Iowa Code section 155A.12 provides, in part, the following:

...The board may refuse to issue or renew a license or may impose a fine, issue a reprimand, or revoke, restrict, cancel, or suspend a license, and may place a licensee on probation, if the board finds that the applicant or licensee has done any of the following:

1. Violated any provision of this chapter or any rules of the board adopted under this chapter.

2. Engaged in unethical conduct as that term is defined by rules of the board.

3. Violated any of the provisions for licensee discipline set forth in section 147.55.

4. Failed to keep and maintain records required by this chapter or failed to keep and maintain complete and accurate records of purchases and disposal of drugs listed in the controlled substances Act.

5. Violated any provision of the controlled substances Act or rules relating to that Act.

1993 Iowa Code section 155A.23 provides, in part, the following:

A person shall not:...

2. Willfully make a false statement in any prescription, report, or record required by this chapter.

....

4. Make or utter any false or forged prescription or written order.

10. Respondent is guilty of violations of 657 Iowa Administrative Code sections 8.5(1), 9.1(4)(b)(2), 9.1(4)(b)(4), 9.1(4)(c), 9.1(4)(i), 9.1(4)(j), and 9.1(4)(u) by virtue of the allegations contained in paragraphs 6, 7, and 8.

657 Iowa Administrative Code section 8.5 provides, in part, the following:

Unethical conduct or practice. The provisions of this section apply to licensed pharmacists and registered pharmacist-interns.

8.5(1) Misrepresentative deeds. A pharmacist shall not make any statement tending to deceive, misrepresent, or mislead anyone, or be a party to or an accessory to any fraudulent or deceitful practice or transaction in pharmacy or in the operation or conduct of a pharmacy.

657 Iowa Administrative Code section 9.1(4) provides, in part, the following:

The board may impose any of the disciplinary sanctions set out in subrule 9.1(2), including civil penalties in an amount not to exceed \$25,000, when the board determines that the licensee or registrant is guilty of the following acts or offenses:...

b. Professional incompetency. Professional incompetency includes but is not limited to:...

(2) A substantial deviation by a pharmacist from the standards of learning or skill ordinarily possessed

and applied by other pharmacists in the state of Iowa acting in the same or similar circumstances.

....

(4) A willful or repeated departure from, or the failure to conform to, the minimal standard or acceptable and prevailing practice of pharmacy in the state of Iowa.

c. Knowingly making misleading, deceptive, untrue or fraudulent representations in the practice of pharmacy or engaging in unethical conduct or practice harmful to the public. Proof of actual injury need not be established.

....

i. Willful or repeated violations of the provisions of Iowa Code chapter 147. Willful or repeated violations of this Act include but are not limited to a pharmacist intentionally or repeatedly violating a lawful rule or regulations promulgated by the board of pharmacy examiners or the state department of health or violating the provisions of Title VII (Public Health) or Title VIII (Practice Acts), Code of Iowa, as amended.

j. Violating a statute or law of this state, another state, or the United States, without regard to its designation as either a felony or misdemeanor, which statute or law relates to the practice of pharmacy.

....

u. Violating any of the grounds for revocation or suspension of a license listed in Iowa Code sections 147.55, 155A.12 and 155A.15.

The Iowa Board of Pharmacy Examiners finds that paragraphs 9 and 10 constitute grounds for which Respondent's license to practice pharmacy in Iowa can be disciplined.

WHEREFORE, the undersigned charges that Respondent has violated 1993 Iowa Code sections 124.308(3), 124.401(1)(c)(6), 124.402(1)(a), 147.55(2), 147.55(3), 155A.12(1), 155A.12(2), 155A.12(3), 155A.12(4), 155A.12(5), 155A.23(2), and 155A.23(4) and 657 Iowa Administrative Code sections 8.5(1), 9.1(4)(b)(2), 9.1(4)(b)(4), 9.1(4)(c), 9.1(4)(i), 9.1(4)(j), and 9.1(4)(u).

IT IS HEREBY ORDERED, pursuant to Iowa Code section 17A.12 and 657 Iowa Administrative Code section 1.2, that Thomas B. Standard appear before the Iowa Board of Pharmacy Examiners on Tuesday, April 19, 1994, at 2:00 p.m., in the second floor conference room, 1209 East Court Avenue, Executive Hills West, Capitol Complex, Des Moines, Iowa.

The undersigned further asks that upon final hearing the Board enter its findings of fact and decision to discipline the license to practice pharmacy issued to Thomas B. Standard on July 31, 1979, and take whatever additional action that they deem necessary and appropriate.

Respondent may bring counsel to the hearing, may cross-examine any witnesses, and may call witnesses of his own. If Respondent fails to appear and defend, Iowa Code section 17A.12(3) provides that the hearing may proceed and that a decision may be rendered. The failure of Respondent to appear could result in disciplinary action, including the permanent suspension or revocation of his license.

The hearing will be presided over by the Board which will be assisted by an administrative law judge from the Iowa Department of Inspections and Appeals. The office of the

Attorney General is responsible for representing the public interest in these proceedings. Information regarding the hearing may be obtained from Theresa O'Connell Weeg, Assistant Attorney General, Hoover Building, Capitol Complex, Des Moines, Iowa 50319 (telephone 515/281-6858). Copies of all filings with the Board should also be served on counsel.

IOWA BOARD OF PHARMACY EXAMINERS

A handwritten signature in cursive script, appearing to read "Lloyd K. Jessen", written over a horizontal line.

Lloyd K. Jessen
Executive Secretary/Director

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

Re: Pharmacist License of THOMAS B. STANDARD License No. 15599 Respondent	} } } } } }	STIPULATION AND INFORMAL SETTLEMENT
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COMES NOW the Iowa Board of Pharmacy Examiners (the Board) and Thomas B. Standard, 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 31st day of July, 1979, by reciprocity, as evidenced by license number 15599, which is recorded in the permanent records of the Board.
2. Iowa Pharmacist License Number 15599 issued to and held by Respondent is current until June 30, 1997.
3. Respondent is currently employed as a pharmacist by A&A Drug of Fremont, Nebraska.
4. A Complaint and Statement of Charges and Notice of Hearing was filed against Respondent on February 21, 1994.
5. The Board has jurisdiction over the parties and the subject matter herein.

6. This Stipulation and Informal Settlement is executed as a compromise settlement of disputed claims.

7. Respondent's license to practice pharmacy is suspended for a period of six (6) months. The suspension is stayed, however, and the Respondent's license is placed on probation for a period of five (5) 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 and all federal and state criminal laws.

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.

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 reside in and practice pharmacy in another State, Respondent shall notify the Board in writing of the dates of departure and return. Periods of residence and practice outside the State shall not apply to reduction of the probationary period.

10. Respondent shall pay a civil penalty of \$1,500.00 within 180 days of the date of approval of this Stipulation and Consent Order by the Board. Respondent shall deliver a check made payable to the Treasurer of the State of Iowa to the Executive Secretary/Director of the Board. The check shall be deposited into the general fund of the State of Iowa.

11. Respondent shall take and successfully pass the Iowa Drug Law Exam (IDLE) with a score of 75 percent by August 1, 1997. Respondent may take the exam a maximum of three (3) times. Failure to pass IDLE by August 1, 1997, will be grounds to revoke probation and take additional disciplinary action.

12. Should Respondent violate probation in any respect, the Board, after giving Respondent notice and an opportunity to be heard, may revoke probation and carry out the stayed suspension. 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.

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

14. 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.

15. This Stipulation and Informal Settlement is voluntarily submitted by the Respondent to the Board for its consideration on the 1st day of April, 1996.



THOMAS B. STANDARD, R.Ph.
Respondent

Subscribed and Sworn to before me on this 1st day of April, 1996.



NOTARY PUBLIC IN AND FOR THE
STATE OF IOWA

16. This Stipulation and Consent Order is accepted by the Iowa Board of Pharmacy Examiners on the 7th day of May, 1996.



PHYLLIS A. OLSON, Chairperson
Iowa Board of Pharmacy Examiners
Executive Hills West
1209 East Court Avenue
Des Moines, Iowa 50319

BEFORE THE IOWA BOARD OF PHARMACY

Re:)	Case No. 2008-70
Pharmacist License of)	
THOMAS B. STANDARD)	STATEMENT OF CHARGES
License No. 15599)	
Respondent.)	

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

1. He is the Executive Director for the Iowa Board of Pharmacy 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 (2007).
3. On July 31, 1979, the Board issued Thomas B. Standard (hereinafter, "Respondent"), by reciprocity, a license to engage in the practice of pharmacy as evidenced by license number 15599, subject to the laws of the State of Iowa and the rules of the Board.
4. Respondent's pharmacist license is current and active until June 30, 2009.
5. Respondent's current address is 1335 Longview Loop, Council Bluffs, Iowa 51503.
6. Respondent was, at all times material, employed as a pharmacist at Pamida-Missouri Valley.

A. CHARGES

COUNT I – UNLAWFUL POSSESSION OF DRUGS

The Respondent is charged with unlawful possession of prescription drugs in violation of Iowa Code §§ 155A.12(1), 155A.21(1) and 155A.23 (1) and (2) (2007) and 657 Iowa Administrative Code 36.1(4)(j) and (u).

COUNT II – INABILITY TO PRACTICE DUE TO CHEMICAL ABUSE

The Respondent is charged with the inability to practice pharmacy with reasonable skill and safety by reason of chemical abuse in violation of Iowa Code § 155A.12(1) (2007) and 657 Iowa Administrative Code 36.1(4)(d)(2), 36.1(4)(j), and 36.1(4)(m) and (u).

COUNT III – ILLEGAL DISTRIBUTION OF DRUGS

The Respondent is charged with distribution of drugs for other than lawful purposes in violation of Iowa Code §§ 155A.12(1) and (2007) and 657 Iowa Administrative Code

36.1(4)(h) and (u), including diversion and distribution of prescription drugs and controlled substances to himself and to members of his family in the absence of a prescription.

COUNT IV – VIOLATION OF CONTROLLED SUBSTANCE LAWS

The Respondent is charged with a failure to comply with controlled substances laws, in violation of Iowa Code §§ 124.306, 124.308, 124.402, and 155A.12(1) and (5) (2007) and 657 Iowa Administrative Code 36.1(4)(j) and (u).

COUNT V – LACK OF PROFESSIONAL COMPETENCY

Respondent is charged under Iowa Code § 155A.12(1) (2007) and 657 Iowa Administrative Code § 36.1(4)(b) 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 VI – WILLFULLY MAKING FALSE STATEMENT

Respondent is charged with willfully making false statements in connection with prescriptions, reports and records required by Iowa Code chapter 155A (2005), in violation of Iowa Code §§ 155A.12(1) and 155A.23(1) and (2) (2007), and 657 Iowa Administrative Code §§ 36.1(4)(j), (u) and (ac), by falsifying prescription records related to purported prescriptions for his wife.

B. CIRCUMSTANCES

Circumstances supporting the above charges are set forth in Attachment A.

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 Director

On this 17 day of February 2009, the Iowa Board of Pharmacy found probable cause to file this Statement of Charges and to order a hearing in this case.


LEMAN E. OLSON, Chairperson
Iowa Board of Pharmacy
400 SW Eighth Street, Suite E
Des Moines, Iowa 50309-4688

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

Standard-SOC 12-08

BEFORE THE IOWA BOARD OF PHARMACY

Re:)	Case No. 2008-70
Pharmacist License of)	
THOMAS B. STANDARD)	STIPULATION
License No. 15599)	AND
Respondent)	CONSENT ORDER
)	

Pursuant to Iowa Code §§ 17A.10 and 272C.3(4) (2009), the Iowa Board of Pharmacy Examiners (hereinafter, “Board”) and Thomas B. Standard (hereinafter, “Respondent”), enter into the following Stipulation and Consent Order 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. Following examination, Respondent was issued a license to practice pharmacy in Iowa on July 31, 1979, as evidenced by Pharmacist License Number 15599 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, 2011.
3. The Board has jurisdiction over the parties and jurisdiction over the subject matter of these proceedings.
4. A Statement of Charges was filed against Respondent on February 17, 2009.
5. Respondent disputes aspects of the Statement of Charges; however, agrees to entry of this Stipulation and Consent Order as a resolution of a disputed claim. Respondent acknowledges that the allegations, if proven in a contested case proceeding, would constitute grounds for the discipline described herein.

6. Respondent is not currently employed as a pharmacist. Respondent shall not resume employment as a pharmacist until he has fully complied with all of the following conditions within the two year period following approval of this Stipulation and Consent Order by the Board:
 - a. Respondent shall give the Board thirty (30) days notice of his intention to return to work as a pharmacist.
 - b. Respondent shall obtain a complete physical and mental health evaluation – including a substance abuse evaluation – from a physician/treatment provider approved in advance by the Board.
 - c. Respondent shall deliver to the Board a written, fully documented and current physical and mental health evaluation -- including a substance abuse evaluation -- of Respondent, by the approved physician/treatment provider, which concludes that Respondent is mentally and physically fit to practice pharmacy. Any conclusion that the Respondent is fit to return to *the practice of pharmacy* shall include an assessment of Respondent's ability to cope with the presence of controlled substances in the pharmacy setting.
 - c. Respondent shall permit the Board complete access to Respondent's medical records, including records of substance abuse evaluation and treatment. Respondent shall promptly provide, upon request of an agent of the Board, copies of his medical records.
7. At such time as Respondent has fully satisfied the provisions of paragraph 6 above, Respondent may resume employment as a pharmacist for no more than twenty (20) hours per week. After Respondent has been employed as a pharmacist – in full

compliance with the terms of this Stipulation and Consent Order – for one year, Respondent may work as a pharmacist not more than thirty (30) hours per week. Upon request, Respondent shall provide complete documentation regarding his hours of employment.

8. Respondent shall appear informally before the Board, upon the request of the Board, for the purpose of reviewing his notice of intention to return to employment as a pharmacist. Respondent shall be given reasonable notice of the date, time, and place for the appearances.
9. Should Respondent fail to resume employment as a pharmacist during the two (2) year period following execution of this Stipulation and Consent Order, the Board may impose additional educational and testing requirements as a precondition to approval of Respondent's employment as a pharmacist.
10. During the two (2) year period following any resumption of employment as a pharmacist, Respondent shall provide witnessed blood, hair or urine specimens on demand by the Board or its agents. The specimens shall be used for alcohol and drug screening, and to verify Respondent's compliance with this Stipulation and Consent Order and any drug therapy ordered by Respondent's physician or treatment provider. All costs related to the analysis of such specimens shall be paid by Respondent.
11. To facilitate performance of the preceding paragraph, Respondent shall report to and provide a specimen to any healthcare provider specified by the Board – said healthcare provider to be located in reasonable proximity to Respondent – within 24 hours after notice from the Board requesting that Respondent provide a specimen. Respondent agrees to cooperate with the Board in establishing a specimen testing

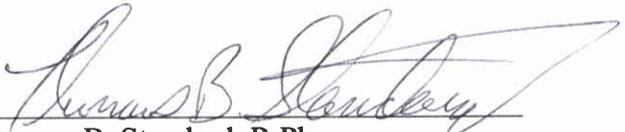
program through FirstLab, and hereby consents to disclosure to the Board, by FirstLab or any other testing facility, of all medical information, including test results, generated by Respondent's contact with the facility.

12. If, as a result of the physical and mental health examinations of Respondent, Respondent's physician/treatment provider recommends a substance abuse treatment program, Respondent shall comply with such recommendations. In the event Respondent is participating in a substance abuse treatment program, Respondent's physician/treatment provider shall submit quarterly reports to the Board documenting Respondent's compliance with the treatment program. If Respondent is found to be chemically dependent, Respondent shall participate in the Iowa Pharmacy Recovery Network (IPRN) program, under the direct support of a pharmacist advocate.
13. Respondent shall not possess or use any controlled substance or prescription drug in any form unless the controlled substance or prescription drug has been authorized and prescribed for Respondent by a licensed, treating physician or other qualified treating health care provider. Respondent shall inform any treating physician or other treating health care provider of his medical history, including any history of chemical dependency.
14. Respondent shall obey all federal and state laws, rules, and regulations related to the practice of pharmacy.
15. Respondent shall not be employed as a pharmacist in charge, supervise any registered pharmacist-intern or perform any of the duties of a pharmacy preceptor.
16. Upon the Board's approval of this Stipulation and Consent Order, Respondent shall be assessed a civil penalty in the amount of \$2000. This civil penalty shall be paid

promptly after the Board's approval of this Stipulation and Consent Order, by check made payable to the Treasurer of Iowa and mailed to the executive director of the Board. All civil penalty payments shall be deposited into the State of Iowa general fund.

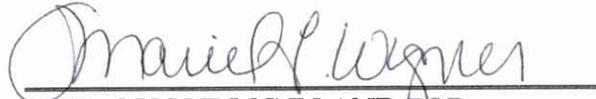
17. Respondent shall obtain thirty (30) hours of pharmacist continuing education credit during each of the two calendar years following execution of this Stipulation and Consent Order, for a total of sixty (60) hours during 2011 and 2012.
18. Should Respondent violate or fail to comply with any of the terms and conditions of this Stipulation and Consent Order, 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 (2009) and 657 IAC 36.
19. 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.
20. The State's legal counsel may present this Stipulation and Consent Order to the Board.
21. This Stipulation and Consent 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 Stipulation and Consent Order, it shall be the full and final resolution of this matter.
22. The Board's approval of this Stipulation and Consent Order shall constitute a FINAL ORDER of the Board.

This Stipulation and Consent Order is voluntarily submitted by Respondent to the Board for its consideration on the 12th day of April 2011.


Thomas B. Standard, R.Ph.
Respondent

Subscribed and sworn to before me by Thomas B. Standard on this 12th day of April ~~2010~~ 2011.




NOTARY PUBLIC IN AND FOR
THE STATE OF IOWA

This Stipulation and Consent Order is approved and accepted by the Iowa Board of Pharmacy on the 27th day of April 2011.


VERNON H. BENJAMIN, Chairperson
Iowa Board of Pharmacy
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

Stacie M. Codr
699 Walnut Street
1900 Hub Tower
Des Moines, IA 50309