

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

Re:)
Pharmacist License of)
JEAN D. THOMAS) **STATEMENT OF CHARGES**
License No. 18392)
Respondent)

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 (1997).
3. On March 13, 1995, Jean D. Thomas, the Respondent, was issued license number 18392 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 18392 is current and active until June 30, 1998.
5. Respondent currently resides at 3918 Lawnwoods Drive, Des Moines, Iowa 50310.
6. Respondent is currently employed as the pharmacist in charge of Mortar & Pestle Pharmacy, 3701 Beaver Avenue, Des Moines, Iowa 50310. Mortar & Pestle Pharmacy is a compounding veterinary pharmacy.

COUNT I

The Respondent is charged under Iowa Code § 155A.12(1) (1997) and 657 Iowa Administrative Code §§ 6.1, 8.1, 8.5(4), 8.19, 9.1(4)(b), 9.1(4)(j), and 9.1(4)(u) with a medication dispensing error at Mortar & Pestle Pharmacy which occurred on or about July 16, 1996.

COUNT II

The Respondent is charged under Iowa Code § 155A.12(1) (1997) and 657 Iowa Administrative Code §§ 6.1, 8.1, 8.5(4), 8.19, 9.1(4)(b), 9.1(4)(j), and 9.1(4)(u) with a medication dispensing error at Mortar & Pestle Pharmacy which occurred on or about November 5, 1996.

COUNT III

The Respondent is charged under Iowa Code §§ 155A.12(1), 155A.12(4), and 155A.27 (1997) and 657 Iowa Administrative Code §§ 6.8, 9.1(4)(j), and 9.1(4)(u) with failing to maintain complete prescription records at Mortar & Pestle Pharmacy.

COUNT IV

The Respondent is charged under Iowa Code §§ 155A.12(1) and 155A.32 (1997) and 657 Iowa Administrative Code §§ 8.15, 9.1(4)(j), and 9.1(4)(u) with failing to comply with the requirements for drug product selection at Mortar & Pestle Pharmacy.

COUNT V

The Respondent is charged under Iowa Code § 155A.12(1) (1997) and 657 Iowa Administrative Code §§ 9.1(4)(j), 9.1(4)(u), and 20.11 with failing to comply with the requirements for bulk compounding at Mortar & Pestle Pharmacy.

COUNT VI

The Respondent is charged under Iowa Code § 155A.12(1) (1997) and 657 Iowa Administrative Code §§ 9.1(4)(j), 9.1(4)(u), and 20.10 with failing to comply with the requirements for drug compounding controls at Mortar & Pestle Pharmacy.

COUNT VII

The Respondent is charged under Iowa Code § 155A.12(1) (1997) and 657 Iowa Administrative Code §§ 9.1(4)(j), 9.1(4)(u), and 20.3(4) with failing to comply with restrictions on the advertising and resale of compounded drug products by Mortar & Pestle Pharmacy.

COUNT VIII

The Respondent is charged under Iowa Code § 155A.12(1) (1997) and 657 Iowa Administrative Code §§ 9.1(4)(j), 9.1(4)(u), and 20.3(3) with distributing compounded veterinary products from the Mortar & Pestle Pharmacy in the absence of a prescriber/patient/pharmacist relationship.

COUNT IX

The Respondent is charged under Iowa Code § 155A.12(1) (1997) and 657 Iowa Administrative Code §§ 9.1(4)(j), 9.1(4)(u), and 20.5 with failing to comply with the component storage requirements and the facility maintenance requirements for drug compounding facilities at Mortar & Pestle Pharmacy.

COUNT X

The Respondent is charged under Iowa Code §§ 124.306, 124.307, 155A.12(1), 155A.12(4), and 155A.12(5) (1997) and 657 Iowa Administrative Code §§ 6.8(5), 6.8(6), 9.1(4)(j), and 9.1(4)(u) with failing to properly utilize and process DEA 222 order forms for the receipt and distribution of Schedule II controlled substances at Mortar & Pestle Pharmacy.

COUNT XI

The Respondent is charged under Iowa Code §§ 124.306, 155A.12(1), 155A.12(4), and 155A.12(5) (1997) and 657 Iowa Administrative Code §§ 6.8(10), 9.1(4)(j), and 9.1(4)(u) with failing to comply with the requirements for the biennial inventory of controlled substances at Mortar & Pestle Pharmacy.

COUNT XII

The Respondent is charged under Iowa Code § 155A.12(1) (1997) and 657 Iowa Administrative Code §§ 8.14, 9.1(4)(j), and 9.1(4)(u) with failing to provide complete labeling for dispensing containers of prescription medication dispensed by Mortar & Pestle Pharmacy pursuant to prescription drug orders.

COUNT XIII

The Respondent is charged under Iowa Code § 155A.12(1) (1997) and 657 Iowa Administrative Code §§ 8.5(4), 9.1(4)(b), 9.1(4)(j), and 9.1(4)(u) with serving in a pharmacy which is not operated in conformance with law.

THE CIRCUMSTANCES

1. On or about July 16, 1996, Respondent mislabeled a dispensing container of pyrimethamine/sulfadiazine which was dispensed for a foal. The label provided incorrect directions for administering the medication. The correct directions for the foal should have been 15 ml once a day. The directions on the label stated "give 15 ml four times a day." The foal died after receiving the pyrimethamine/sulfadiazine.

2. On or about November 5, 1996, the Mortar & Pestle Pharmacy incorrectly compounded a prescription for injectable doxycycline which was dispensed for a cockatiel. The doxycycline preparation should have contained water. Instead, it contained isopropyl alcohol. The cockatiel died after receiving the doxycycline preparation.

3. On January 27, 1997, a routine pharmacy inspection of the Mortar & Pestle Pharmacy revealed numerous deficiencies, including the following:

a. Failure to document the name and address of the owner of the animal on prescription drug orders.

b. Failure to document the prescriber's dispensing instructions for drug product selection.

c. Failure to document either the manufacturer's or distributor's name or the National Drug Code (NDC) of the actual drug product dispensed for drug product selection.

d. Failure to include in the bulk compounding production record the initials of the pharmacist who verified the finished product.

e. Failure to determine an expiration date for bulk compounded items and failure to provide the expiration date on the label of such items.

f. Failure to have adequate written procedures for the compounding of veterinary drug products.

g. Failure to conduct drug product testing and examination for compounded veterinary drug products.

h. Failure to comply with restrictions on the advertising and resale of compounded veterinary drug products.

i. Failure to ensure the existence of a prescriber/patient/pharmacist relationship for all prescription drug orders dispensed for compounded veterinary drug products.

j. Failure to maintain drug compounding components and compounding areas as required.

k. Failure to properly date, initial, and document the quantity of Schedule II controlled substances received on DEA 222 order forms.

l. Failure to properly utilize and process DEA 222 order forms for the distribution of Schedule II controlled substances, including Nembutal® and Numorphan®.

m. Failure to date and sign the biennial inventory of controlled substances and to indicate the time of day that the inventory was taken.

n. Failure to provide complete labeling for dispensing and storage containers of compounded veterinary drug products.

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.


Lindy A. Pearson
Chief Investigator

On this 6th day of March, 1997, 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 cursive script, appearing to read "Phyllis A. Olson", written over a horizontal line.

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

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

Re: Pharmacist License of
JEAN D. THOMAS
License No. 18392
Respondent

**STIPULATION
AND
CONSENT ORDER**

On this 10th day of June, 1997, the Iowa Board of Pharmacy Examiners and Jean D. Thomas, of 3918 Lawnwoods Drive, Des Moines, Iowa, each hereby agree with the other and stipulate as follows:

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 March 6, 1997, 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 license to practice pharmacy in Iowa on the 13th day of March, 1995, by examination as evidenced by Pharmacist License Number 18392, which is recorded in the permanent records of the Iowa Board of Pharmacy Examiners.

2. That Iowa Pharmacist License Number 18392 issued to Respondent is active and current until June 30, 1998.

3. That 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 on March 6, 1997.

SECTION I

THEREFORE, IT IS HEREBY ORDERED that Iowa Pharmacist License Number 18392 issued to Respondent is placed on probation for two (2) years. During the probationary period the Respondent shall obey all federal and state laws, rules, and regulations substantially related to the practice of pharmacy and the distribution of controlled substances.

SECTION II

1. Within thirty (30) days of the date of this Order, the Respondent shall pay a civil penalty of \$ 500.00 by delivering 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.

2. Within sixty (60) days of the date of approval of this Stipulation and Consent Order by the Board, the Respondent shall develop and submit to the Board, for its approval, written policies and procedures for the following:

a. Documenting, resolving, and preventing medication dispensing errors. The policy and procedure shall include a written protocol which describes the procedure for Respondent to follow when a dispensing error occurs. The policy and procedure shall also require that all records of dispensing errors be consistently and periodically evaluated by Respondent as part of a cycle of continuous quality improvement. Records of dispensing errors shall be maintained by Respondent for a minimum of two years.

b. Maintaining complete and accurate prescription records, including the full name and address of the owner of the animal(s).

c. Complying with all of the requirements for drug product selection, including the prescriber's dispensing instructions and either the manufacturer's or distributor's name or the National Drug Code (NDC) of the actual drug product dispensed.

d. Complying with all of the requirements for bulk compounding of drug products, including documentation in the bulk compounding production record of the initials of the pharmacist who verified the finished drug product; component storage; drug compounding facility maintenance; drug compounding controls; expiration dating for compounded drug products (determination of an appropriate expiration date and providing the expiration date on the label of such drug product); compounded drug product testing, examination, and quality control; and all other requirements contained in 657 Iowa Administrative Code chapter 20, "Pharmacy Compounding Practices."

e. Complying with restrictions on the advertising and resale of compounded drug products.

f. Verifying the existence of a bona fide prescriber/patient/pharmacist relationship before distributing compounded veterinary drug products.

g. Complying with the requirements for the biennial inventory of controlled substances, including documentation of the date on which the biennial inventory was taken and the signature of the pharmacist(s).

h. Providing complete labeling on dispensing containers of prescription medication dispensed pursuant to a prescription drug order.

i. Training and utilization of pharmacy technicians. Such policies and procedures shall provide appropriate methods for pharmacist supervision and oversight of pharmacy technicians. Such policies and procedures shall be periodically reviewed by Respondent. Respondent's policies shall specify the frequency of review.

j. Complying with the requirements for receiving new prescription drug orders containing in 657 Iowa Administrative Code § 22.15.

k. Complying with all state and federal requirements pertaining to the proper use and handling of harmful or toxic substances including powders. Respondent shall maintain appropriate safety information on all such materials.

Following review and approval by the Board, the Respondent agrees to adopt, implement, and adhere to these policies and procedures.

3. Respondent shall not dispense any prescription medication without a valid prescription drug order from an authorized prescriber.

4. Respondent shall report to the Board any judgment or settlement of a malpractice claim or action and any dispensing errors brought to their attention by consumers, health care professionals, or others within thirty (30) days of such occurrence.

5. 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.

6. Respondent may apply to the Board for modification or termination of the probationary period after one year of probation has been successfully completed.

7. Respondent shall fully and promptly comply with all Orders of the Board and the statutes and rules regulating the practice of pharmacy in Iowa. Any violation of the terms of this Order is grounds for further disciplinary action, upon notice and opportunity for hearing, for failure to comply with an Order of the Board, in accordance with Iowa Code section 272C.3(2)(a).

8. Should Respondent violate probation in any respect, the Board, after giving Respondent notice and an opportunity to be heard, may revoke probation and impose additional disciplinary sanctions, including the revocation of Respondent's license to operate a pharmacy. 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.

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

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

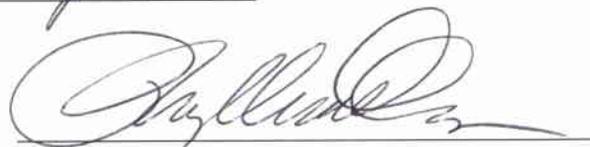
11. This Stipulation and Consent Order is voluntarily submitted by Respondent to the Board for its consideration on the 13th day of May, 1997.


JEAN D. THOMAS, R.Ph.
Respondent

Subscribed and Sworn to before me on this 13th day of May, 1997.


NOTARY PUBLIC IN AND FOR THE
STATE OF IOWA

12. This Stipulation and Consent Order is accepted by the Iowa Board of Pharmacy Examiners on the 10th day of June, 1997.


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

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

Re:)
Pharmacist License of)
JEAN D. THOMAS) **STATEMENT OF CHARGES**
License No. 18392)
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 (1997).

3. On March 13, 1995, Jean D. Thomas, the Respondent, was issued license number 18392 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 18392 is current and active until June 30, 1998.

5. Respondent currently resides at 3114 200th Street, Dallas Center, Iowa 50063.

6. Respondent is currently employed as a pharmacist at Mortar & Pestle Veterinary Pharmacy, 3701 Beaver Avenue, Des Moines, Iowa 50310.

COUNT I

The Respondent is charged with failing to comply with a decision of the Board imposing licensee discipline, in violation of 1997 Iowa Code § 272C.3(2)(a) and 657 Iowa Administrative Code § 9.1(4)(i).

COUNT II

The Respondent is charged under Iowa Code § 155A.12 (1997) and 657 Iowa Administrative Code § 8.5(1) with misrepresentative deeds.

COUNT III

The Respondent is charged under Iowa Code § 155A.12 (1997) and 657 Iowa Administrative Code §§ 8.5(4), 9.1(4)(b), 9.1(4)(j), and 9.1(4)(u) with nonconformance with law.

THE CIRCUMSTANCES

1. Respondent previously received a Statement of Charges from the Board dated March 6, 1997. Subsequently, a Stipulation and Consent Order dated June 10, 1997, was approved by the Board. The Stipulation and Consent Order placed Respondent on probation with the Board from June 10, 1997, to June 10, 1999.

2. An inspection, investigation, and audit of Mortar & Pestle Veterinary Pharmacy was conducted beginning on February 10, 1998. The observations and findings of the inspection, investigation, and audit indicate that between June 10, 1997, and May 12, 1998, Respondent has violated the terms of the Stipulation and Consent Order dated June 10, 1997, as follows:

a. Respondent has failed to obey all federal and state laws, rules, and regulations substantially related to the practice of pharmacy.

b. Respondent has failed to maintain complete and accurate prescription records.

c. Respondent has failed to comply with all the requirements contained in 657 Iowa Administrative Code chapter 20, "Pharmacy Compounding Practices."

d. Respondent has failed to consistently verify the existence of a bona fide prescriber/patient/pharmacist relationship before distributing compounded veterinary drug products.

e. Respondent has failed to properly train and utilize pharmacy technicians and has failed to provide appropriate pharmacist supervision and oversight of pharmacy technicians.

f. Respondent has failed to comply with all state and federal requirements pertaining to the proper use and handling of harmful or toxic substances including powders.

g. Respondent has dispensed prescription medications without a valid prescription drug order from an authorized prescriber.

h. Respondent has failed to report to the Board all dispensing errors brought to its attention within thirty (30) days of such occurrence.

i. Respondent has failed to cause all new pharmacy employees to report to the Board in writing, acknowledging that they have read the Stipulation and Consent Order dated June 10, 1997.

3. The findings of the inspection indicate that Respondent has failed to comply with all applicable requirements for the preparation of sterile products.

4. The findings of the investigation indicate that Respondent has been involved in the removal of pharmaceutical products from the Mortar & Pestle Veterinary Pharmacy in order to conceal them from regulatory officials and has provided incomplete or altered pharmacy records and information during the course of the investigation.

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 12th day of May, 1998, 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
Executive Hills West
1209 East Court Avenue
Des Moines, Iowa 50319

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

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

Re:)
Pharmacist License of)
JEAN D. THOMAS)
License No. 18392)
Respondent)

**STIPULATION
AND
CONSENT ORDER**

COME NOW the Iowa Board of Pharmacy Examiners ("the Board") and Jean D. Thomas, R.Ph. ("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 May 12, 1998, 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 license to practice pharmacy in Iowa on the 13th day of March, 1995, as evidenced by Pharmacist License Number 18392, which is recorded in the permanent records of the Iowa Board of Pharmacy Examiners.
2. That Iowa Pharmacist License Number 18392, issued to and held by Respondent is active and current until June 30, 2000.
3. Respondent is not currently employed as a pharmacist.
4. A Statement of Charges was filed against Respondent on May 12, 1998.
5. That the Iowa Board of Pharmacy Examiners has jurisdiction over the parties and

the subject matter herein.

6. This Stipulation and Consent Order is entered into in order to resolve disputed claims and constitutes no admission on the part of the Respondent.
7. Respondent's license shall be placed on probation for two (2) years, with the following conditions, beginning on the date this Stipulation and Consent Order is accepted by the Board:
 - a. Within sixty (60) days of the date of approval of this Stipulation and Consent Order by the Board, the Respondent will provide her written policies and procedures for the following: (a) dispensing accuracy, including policies and procedures for verification of a valid prescription and a bona fide prescriber/patient/pharmacist relationship before distribution, (b) maintaining complete and accurate prescription records, (c) compliance with state and federal requirements pertaining to the proper use and handling of harmful or toxic substances, and (d) compliance with applicable requirements for the preparation of sterile products. The written policies and procedures shall relate to Respondent's practice of pharmacy in her current work setting. Following review and approval by the Board, the Respondent agrees to adopt, implement, and adhere to these policies and procedures whenever engaging in the practice of pharmacy.
 - b. Within one year of the date of approval of this Stipulation and Consent Order by the Board, the Respondent shall complete continuing pharmacy education (CPE) or other formal, structured education. The education shall be *not less than* thirty (30) hours in length and shall be pre-approved

by the Board. Documentation of satisfactory completion of the education shall be submitted to the Board. This education is in addition to the thirty (30) hours of continuing pharmacy education required every two years for license renewal.

- c. During probation, Respondent shall inform the Board in writing within ten (10) days of any change of home address, place of employment, home telephone number, or work telephone number.
- d. During probation, Respondent shall 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.
- e. Respondent shall make personal appearance before the Board or a Board committee upon request. The Respondent shall be given reasonable notice of the date, time, and location for such appearances.
- f. Respondent shall obey all federal and state laws and regulations substantially related to the practice of pharmacy and the distribution of controlled substances.
- g. In the event Respondent engages in the practice of compounding, she shall comply with all of the requirements contained in 657 Iowa Administrative Code chapter 20, "Pharmacy Compounding Practices," and she shall provide the Board with her written policies and procedures for compliance with the requirements for Pharmacy Compounding Practices set forth in 657 IAC chapter 20 within sixty (60) days of beginning to engage in such

practice.

- h. Respondent shall not supervise any registered pharmacist-intern and shall not perform any of the duties of a pharmacy preceptor.
 - i. Respondent shall not serve as the pharmacist in charge of a pharmacy.
8. Respondent shall pay a civil penalty of \$250.00 within 30 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.
 9. The Respondent shall obey all federal and state laws, rules, and regulations substantially related to the practice of pharmacy.
 10. 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 Consent Order by the Board, and within fifteen (15) days of undertaking new employment as a pharmacist, Respondent shall cause her pharmacy employer to report to the Board in writing acknowledging that the employer has read this document and understands it.
 11. In the event Respondent leaves Iowa to reside or to practice pharmacy outside the state of Iowa, Respondent shall notify the Board in writing of the dates of departure and return. Periods of residence or practice outside Iowa will not apply to the duration of this Consent Order unless Respondent becomes licensed in another state and is subject to a similar disciplinary order in that state. However,

evidence that Respondent has failed to abide by the terms of subparagraphs 7(a) or 7(b) of this Consent Order while outside the state shall constitute a violation of this Consent Order.

12. 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 pharmacist license or to impose other licensee discipline as authorized by Iowa Code chapters 272C and 155A and 657 IAC 9.1.
13. 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.
14. 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.
15. 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.
16. The Board's approval of this Stipulation and Consent Order shall constitute a **FINAL ORDER** of the Board in a disciplinary action.

17. This Stipulation and Consent Order is voluntarily submitted by Respondent to the Board for its consideration on the 4 day of January, 1999.

Jean D. Thomas R.Ph.
Jean D. Thomas, R.Ph.
Respondent

Subscribed and sworn to before me by Jean D. Thomas on this 4 day of January, 1999.



Starr Ann Sanders
NOTARY PUBLIC IN AND FOR THE
STATE OF OREGON

18. This Stipulation and Consent Order is accepted by the Iowa Board of Pharmacy Examiners on the 3 day of Feb., 1999.

Arland D. Van Norman
ARLAND D. VAN NORMAN, Chairperson
Iowa Board of Pharmacy Examiners
Executive Hills West
1209 East Court Avenue
Des Moines, Iowa 50319

APPROVED AS TO FORM:

David H. Luginbill
David H. Luginbill - Attorney for Respondent

Shauna Russell Shields
Shauna Russell Shields - Attorney for the Board

cc: David H. Luginbill
Ahlers, Cooney, Dorweiler, Haynie, Smith & Allbee, P.C.
100 Court Avenue
Suite 600
Des Moines, Iowa 50309-2231

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