

BEFORE THE OHIO STATE BOARD OF PHARMACY

(Docket No. D-930212-062)

In re:

Paula Brown Worth, R.Ph.
Ohio Registered Pharmacist
License No. 03-1-12317

CONSENT AGREEMENT

This Consent Agreement is entered into between the Ohio State Board of Pharmacy ("the Board") and Paula Brown Worth, R.Ph., ("Worth") a licensee of the Board. In order to resolve charges in a Notice of Opportunity letter issued by the Board on February 12, 1993, on which charges Worth has requested a hearing before the Board, and in order to obviate the need for such a hearing, the Board and Worth agree as follows:

1. The Board and Worth stipulate that Worth is, and has been since May 4, 1979, a licensee of the Board.
2. The Board and Worth stipulate that Worth received a Notice of Opportunity letter, dated February 12, 1993, attached hereto as Exhibit A. It is understood by the Board and Worth that no other charges or citations by the Board are pending against Worth at this time.
3. The Board and Worth stipulate that, in response to the Notice of Opportunity letter, Worth requested a hearing before the Board.
4. The Board and Worth stipulate that the Board has afforded Worth an opportunity for a hearing.
5. The Board and Worth stipulate, as part of this Consent Agreement, that Worth hereby waives her opportunity for a full hearing.

6. With respect to the allegations contained in Paragraphs 2(a), 2(b), 2(c), 2(d), 2(e), 2(f), 2(g), 2(h), 2(i), 2(j), 2(k), 3, 4(a), 4(b), 4(c), 4(d), 4(e), 5, 6, 7, 8, 9, 10, 11, 13(a), 13(b), 13(c), 13(d), 13(e), 13(f), 13(g), 13(h), 13(i), 13(j), 13(k), 13(l), 13(m), 13(n), 13(o), 13(p), 13(q), 13(r), and 13(s) of the Notice of Opportunity letter, the Board and Worth stipulate, solely for purposes of this proceeding, to a finding that Worth engaged in conduct which constitutes unprofessional conduct in the practice of pharmacy within the meaning of Chapter 4729. of the Ohio Revised Code.

7. The Board and Worth agree that, on the basis of the above stipulations, the Board will impose a sanction upon Worth consisting of a fine of \$2,000.00 and probation for a period of Five (5) years from the date when this Agreement is accepted by the Board. During the period of her probation, Worth shall not serve as a preceptor. If, during the terms of her probation, Worth violates any of the laws or rules governing pharmacy practice, the Board may reinstitute its action against her license for alleged violations cited in the Notice of Opportunity letter dated February 12, 1993, and for any new violations.

8. This Consent Agreement contains the entire agreement between the parties, there being no other agreement of any kind, verbal or otherwise, which varies its terms.

9. Worth waives any and all claims or causes of action she may have against the State of Ohio, the Board, and members, officers, employees and or agents of either, arising out of matters which are the subject of this Consent Agreement, including all claims for recovery of attorneys' fees.

10. This Consent Agreement shall be considered to be a public record as that term is used in §149.43, Ohio Revised Code.

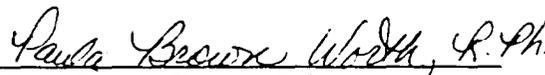
11. Upon consent of both parties, the terms and conditions of this Consent Agreement may be modified or terminated in writing.

12. This Agreement shall not become effective until it is approved by the Board at its meeting of October 25 - 29, 1993. If approved, the acceptance of this Agreement by the Board and Worth will be entered into the Minutes of the Board. In the event that this Consent Agreement is not fully executed, this offer is withdrawn, and the terms of this Consent Agreement shall not be relied upon or introduced in any other civil or administrative action by either party.

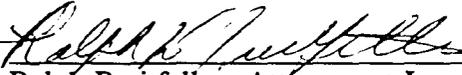
13. This Agreement will become effective upon the last date of signature, below.

OHIO STATE BOARD OF PHARMACY


Joseph R. Sabino, President 10-25-93


Paula Brown Worth, R.Ph. 10/16/93
Paula Brown Worth, R.Ph.


Gregg Thornton, Assistant Attorney General
Counsel for the Board 10/25/93


Ralph Breitfeller, Attorney at Law
Counsel for Paula Brown Worth 10/22/93

RS/jac/Worth