



OHIO STATE BOARD OF PHARMACY

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SETTLEMENT AGREEMENT WITH THE STATE BOARD OF PHARMACY VOLUNTARY SURRENDER WITH DISCIPLINARY ACTION PENDING

In The Matter Of:

Paul Raptou, R.Ph.
5380 Old Oxford Lane
Youngstown, Ohio 44512
(R.Ph. No. 03-2-07645)

This Settlement Agreement is entered into by and between Paul Raptou and the Ohio State Board of Pharmacy, a state agency charged with enforcing the Pharmacy Practice Act and Dangerous Drug Distribution Act, Chapter 4729. of the Ohio Revised Code.

Paul Raptou enters into this Agreement being fully informed of his rights afforded under Chapter 119. of the Ohio Revised Code, including the right to representation by counsel and the right to a formal adjudication hearing on the issues contained herein.

Paul Raptou is knowingly and voluntarily acknowledging that, in order to settle the disciplinary charges that would be filed by the Board against him and in order to obviate the need to conduct an administrative hearing to consider possible disciplinary sanctions against Paul Raptou's license to practice pharmacy in the State of Ohio, this Agreement is entered into on the basis of the following stipulations, admissions, and understandings:

- (A) The Ohio State Board of Pharmacy is empowered by Section 4729.16 of the Ohio Revised Code to suspend, revoke, place on probation, refuse to grant or renew an identification card, or impose a monetary penalty on the license holder for violation of any of the enumerated grounds.
- (B) Paul Raptou neither admits nor denies the allegations pending in the Board's investigation; however, the Board has initiated and conducted an investigation pursuant to the mandate of Sections 3719.18 and 4729.25 of the Ohio Revised Code.
- (C) Paul Raptou acknowledges that he has been made aware of the investigation and has cooperated in said investigation. Paul Raptou further acknowledges that he has not been promised or given anything to indicate that the State of Ohio will not proceed with criminal charges; that criminal charges may be filed in the discretion of the appropriate prosecuting attorney(s) and/or grand jury(ies).

Wherefore, in consideration of the foregoing and mutual promises hereinafter set forth, and in lieu of the filing of formal ADMINISTRATIVE charges and 119. hearing at this time, Paul Raptou knowingly and voluntarily **SURRENDERS PERMANENTLY TO THE STATE BOARD OF**

Paul Raptou Settlement Agreement

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PHARMACY HIS LICENSE AND REGISTRATION TO PRACTICE PHARMACY, WITH DISCIPLINARY ACTION PENDING.

Paul Raptou acknowledges that he has had an opportunity to ask questions concerning the terms of this agreement and that all questions asked have been answered in a satisfactory manner.

Paul Raptou waives any and all claims or causes of action he may have against the State of Ohio or the Board, and members, officers, employees, and/or agents of either, arising out of matters which are the subject of this Agreement. Paul Raptou waives any rights of appeal pursuant to Chapter 119. of the Ohio Revised Code.

This Settlement Agreement shall be considered a public record, as that term is used in Section 149.43 of the Ohio Revised Code, and shall become effective upon the date of the Board President's signature below.

Paul Raptou, R.Ph.

06/05/2004
Date of Signature

Witness

06/05/2004
Date of Signature

Witness

06/05/2004
Date of Signature

Robert P. Giacalone, President, Ohio State Board of Pharmacy

06/21/2004
Date of Signature

Sally Ann Steuk, Ohio Assistant Attorney General

06/21/2004
Date of Signature

STATE BOARD OF PHARMACY

vs

PAUL RAPTOU

OS-2-07645

THE MATTER OF THE STATE BOARD OF PHARMACY VERSUS PAUL RAPTOU, DOCKET 6-3-3, WAS HEARD PURSUANT TO CHAPTER 119, OHIO REVISED CODE. MOTION WAS MADE AND RECORDED THE FOLLOWING ORDER BE ADOPTED:

ORDER

1. THE STATE BOARD OF PHARMACY FINDS PAUL RAPTOU DID VIOLATE SECTION 4729.16(A), OHIO REVISED CODE, IN THAT HE WAS ADJUDGED GUILTY AND CONVICTED OF VIOLATION OF TITLE 21, SECTION 841(a)(1), U.S.C.
2. THE STATE BOARD OF PHARMACY FINDS UNDER SECTION 4729.16(A), R.C., THE STATE BOARD OF PHARMACY, AFTER NOTICE AND HEARING IN ACCORDANCE WITH SECTIONS 119.01 TO 119.13, INCLUSIVE, OF THE REVISED CODE, MAY REVOKE, SUSPEND, OR REFUSE TO GRANT AN IDENTIFICATION CARD OR RENEWAL IDENTIFICATION CARD UNDER THIS CHAPTER, IF A MAJORITY OF THE MEMBERS OF THE BOARD FIND A PHARMACIST GUILTY OF A FELONY.
3. THE STATE BOARD OF PHARMACY SUSPENDS THE IDENTIFICATION CARD OF PAUL RAPTOU FOR TWO YEARS, EFFECTIVE THIS DATE (AUGUST 13, 1974).
- ** 4. THE STATE BOARD OF PHARMACY SUSPENDS THIS ORDER.

THIS MOTION WAS APPROVED BY A ROLL CALL VOTE OF THE STATE BOARD OF PHARMACY. BOARD MEMBER, HAROLD J. KLAWITTER TOOK NO PART IN THE HEARING OR DISPOSITION OF THIS MATTER.

MOTION CARRIED.

SO ORDERED.

** Item 4 was amended September 24, 1974 to read as follows:

4. THE STATE BOARD OF PHARMACY SUSPENDS THIS ORDER FOR TWO (2) YEARS, SUBJECT TO THE GOOD BEHAVIOR OF THE DEFENDANT. SUCH SUSPENSION MAY BE REVOKED BY THE BOARD FOR CAUSE.