

Holly L. Fisher, KS Bar #24023  
Kansas State Board of Pharmacy  
800 SW Jackson, Suite 1414  
Topeka, KS 66612  
(785) 296-4056 (tel.)  
(785) 296-8420 (fax)  
[holly.fisher@pharmacy.ks.gov](mailto:holly.fisher@pharmacy.ks.gov)

Filed  
DEC 01 2011  
KANSAS STATE  
Board of Pharmacy

**BEFORE THE KANSAS STATE BOARD OF PHARMACY**

*In the Matter of* )  
 ) Case No. 11-89  
Gregory Stites, R.Ph. )  
License No. 1-12790. )

**CONSENT AGREEMENT**

This Consent Agreement is voluntarily entered into by Gregory Stites (“Defendant”), and the Kansas State Board of Pharmacy (“Board”), in lieu of further prosecution based on the Petition filed in the above-captioned matter.

WAIVER OF RIGHTS: Defendant understands that he has the following rights in this case: The right to discovery, a hearing before the Board, and if found in violation of the Kansas Pharmacy Act, the right to appear before the District Court and Kansas appellate courts pursuant to the Kansas Judicial Review Act (the “KJRA”).

Defendant hereby acknowledges his right to be represented by a lawyer of his own choosing. Knowing these rights, Defendant, by signing this agreement, knowingly and voluntarily gives up these rights, including the right to a hearing by the Board.

FACTS: Defendant neither admits nor denies the facts as presented in the Petition filed in the above-stated matter. Instead, the Board and Defendant enter into this Consent Agreement in

order to minimize the economic and legal impacts of litigating the matter at a hearing in front of the Board or otherwise.

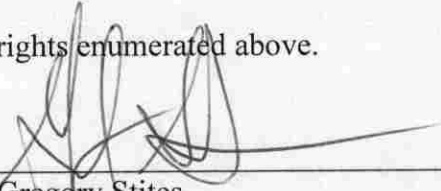
TERMS AND CONDITIONS:

Defendant's license to practice pharmacy in the State of Kansas will be placed in probationary status for a period of four (4) years from the date this Consent Agreement is reviewed by the Board and Defendant must satisfy the following terms within the <sup>four</sup>~~two~~-year probationary period:

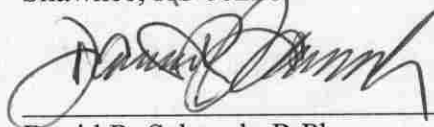
- a. Defendant shall not violate the laws of the United States, the State of Kansas, including the Kansas Pharmacy Act along with its implementing rules and regulations;
- b. Defendant shall not act as a pharmacist-in-charge as defined by K.S.A. § 65-1626d(t) for a period of four (4) years from the date this Consent Agreement becomes final.
- c. Defendant agrees to complete three (3) additional blocks of continuing education specifically pertaining to professional conduct in the pharmacy profession. Defendant shall notify the Board of his successful completion of each block of continuing education as required herein.

CONSENT OF THE KANSAS STATE BOARD OF PHARMACY: This Consent Agreement is not binding upon the Board until it has been reviewed and agreed to by the Kansas State Board of Pharmacy at its next quarterly meeting, to be held November 30 and December 1, 2011.

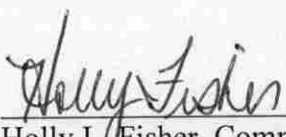
The parties below have read this Diversion Agreement, know and understand its contents, and agree to comply with its terms. Defendant specifically agrees to waive the constitutional rights enumerated above.

  
\_\_\_\_\_  
Gregory Stites  
22116 West 69<sup>th</sup> Terrace  
Shawnee, KS 66226

Date: 11/11/11

  
\_\_\_\_\_  
David R. Schoech, R.Ph.  
Investigative Member  
Kansas State Board of Pharmacy  
800 SW Jackson St., Ste. 1414  
Topeka, KS 66612

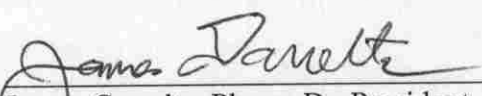
Date: 11-21-2011

  
\_\_\_\_\_  
Holly L. Fisher, Compliance Counsel  
Kansas State Board of Pharmacy  
800 SW Jackson St., Ste 1414  
Topeka, KS 66612

Date: 11/15/11

**APPROVAL OF THE BOARD OF PHARMACY**

This Consent Agreement has been reviewed by the Kansas State Board of Pharmacy and is agreed to as of the date stated below.

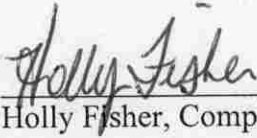
  
\_\_\_\_\_  
James Garrelts, Pharm.D., President  
Kansas State Board of Pharmacy  
800 SW Jackson St., Ste. 1414  
Topeka, KS 66612

Date: 11/30/2011

CERTIFICATE OF SERVICE

I hereby certify that I did, on the 2<sup>nd</sup> day of December, 2011, deposit in the United States Mail, postage prepaid, a fully executed copy of the foregoing Consent Agreement, properly addressed to the following:

Gregory Stites  
22116 West 69<sup>th</sup> Terrace  
Shawnee, KS 66226.

  
\_\_\_\_\_  
Holly Fisher, Compliance Counsel