

BEFORE THE KANSAS BOARD OF PHARMACY

KANSAS BOARD OF PHARMACY,)
)
Plaintiff,)
)
vs.)
)
KYLE B. JONES)
Kansas Registration No. 3-06291)
)
Defendant.)
_____)

Filed By
MAY 22 2015
KANSAS STATE
BOARD OF PHARMACY

Case No. 15-026

**PETITION TO REVOKE, SUSPEND OR OTHERWISE
LIMIT LICENSURE**

The Kansas Board of Pharmacy (the "Board") for its petition to revoke, suspend or otherwise limit the Kansas intern registration of Kyle B. Jones (the "Registrant") to practice as a pharmacy intern, alleges and states as follows:

1. The Board is the Kansas agency vested with the authority to carry out and enforce the provisions of the Kansas Pharmacy Act, K.S.A. 65-1626 *et seq.* (the "Act"), including conducting hearings and proceedings to revoke, suspend, limit or otherwise discipline a Kansas license to practice pharmacy.

2. The Registrant is presently entitled to practice as a pharmacy intern in the State of Kansas by reason of the Board having issued him Kansas intern registration number 3-06291. At all times relevant hereto, the Registrant has held a current registration to practice as a pharmacy intern in the State of Kansas.

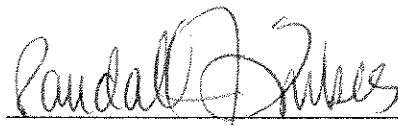
3. The Board's Investigation Member has received certain information, has investigated and has determined that there are reasonable grounds to believe that the Registrant has committed an act or acts in violation of the Act that would subject his pharmacy intern registration to discipline pursuant to K.S.A. 65-1676 (d)(1) and K.S.A. 65-1627.

4. While acting as a pharmacist intern, Respondent diverted drugs belonging to his employer.

5. On information and belief it is alleged that the Registrant is addicted to drugs to such a degree as to render him unfit to practice as a pharmacy intern.

6. The Registrant has committed an act or acts, including the conduct identified in paragraphs 4 and 5 above, that would justify disciplinary action against his intern registration pursuant to K.S.A. 65-1676 (d)(1) and (2) and K.S.A. 65-1627 (a)(3), (4), (5) and (13).

WHEREFORE it is requested that proceedings be initiated, pursuant to the Act and Kansas Administrative Procedure Act, K.S.A. 77-501 *et seq.*, and that in accordance therewith findings and conclusions be made that facts exist demonstrating that the Registrant has committed acts which justify disciplinary action being taken against his Kansas intern registration and order that Registrant's intern registration be revoked or such other disciplinary action as shall be determined to be appropriate.



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**DISCIPLINARY COUNSEL FOR THE
KANSAS BOARD OF PHARMACY**

CERTIFICATE OF SERVICE

I hereby certify that I did, on the 20th day of May, 2015, deposit in the United States mail, first class postage prepaid, a copy of this **PETITION TO REVOKE, SUSPEND OR OTHERWISE LIMIT LICENSURE**, properly addressed to the following:


original to:

Debra Billingsley
Executive Director
KANSAS BOARD OF PHARMACY
800 SW Jackson, Suite 1414
Topeka, KS 66612

and mailed one copy first class mail and one copy certified, return receipt requested to:

Kyle B. Jones
550 Stone Ridge Dr., Apt. D208
Lawrence, KS 66049

Kyle B. Jones
2307 Hawthorne Dr.
Lawrence, KS 66047



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