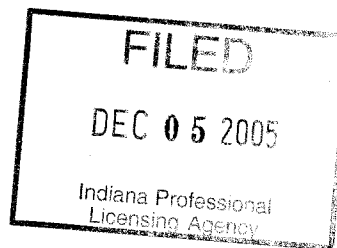


BEFORE THE INDIANA STATE
BOARD OF NURSING
CAUSE NUMBER: 2005 NB 0192

STATE OF INDIANA,)
)
Petitioner,)
)
v.)
)
TRACEY LYNN RAMBO, LPN)
LICENSE NUMBER: 27046140A,)
)
Respondent.)
)



COMPLAINT

The State of Indiana, by counsel, Deputy Attorney General, Laura E. Wilford, on behalf of the Office of the Attorney General (“Petitioner”), and pursuant to Indiana Code § 25-1-7-7, Ind. Code §25-1-5-3, Ind. Code §25-23-1-7 et seq., the Administrative Orders and Procedures Act, Ind. Code § 4-21.5-3 et seq. and Ind. Code § 25-1-9-1 et seq., files its Complaint against the Licensed Practical Nurse license of Tracey Lynn Rambo, LPN (“Respondent”), and in support alleges and states:

FACTS

1. The Respondent address on file with the Indiana Professional Licensing Agency is 642 E. North Street, Apt. 10, Kendallville, IN 46755 and she is a licensed Licensed Practical Nurse in the State of Indiana having been issued license number 27046140A.

2. On or around January 2, 2002, the Respondent was arrested and charged in Porter County Superior Court #5 with Aiding an Offense, a Class D Felony and Conversion, a Class C Misdemeanor. The Respondent found the wallet of JW and then drove Douglas Wilson and Shawn Trumbull to the Portage Tobacco Mart on Willowcreek Road, Portage, Indiana on

November 3, 2001. There, Wilson and Trumbull attempted to purchase \$500.00 worth of cigarettes on the debit card of JW. The limit of the debit card was not that high and so ultimately a cigarette purchase of \$75.60 was made. The Respondent then drove the men away, but employees of the Portage Tobacco Mart obtained a license plate number. Trumbull confessed to the police that the brand of cigarettes purchased were favored by their narcotics dealer and they were attempting to trade cigarettes for drugs.

3. On or around March 28, 2002, the Respondent was arrested and charged in Allen County Superior Court with two counts of Information for Aiding Theft, a Class D Felony. On or around November 8, 2001, the Respondent and two males, later identified as Shawn Trumbull and Douglas Wilson entered the Tobacco Stop located at 338 East Dupont Road in Allen County. There, the Respondent and Trumbull distracted the clerk at the store while Wilson stole three cartons of cigarettes. The three then returned to the same Tobacco Stop the next day, November 9, 2001 and stole cartons of cigarettes again.

4. On or around August 27, 2002, the Respondent pled guilty in Porter County to an orally amended charge of Aiding in Conversion, a Class A Misdemeanor. Respondent was sentenced to one (1) year in Porter County Jail, all but seventeen days suspended and that is to be served as two (2) days credit in Porter County Jail, fifteen (15) days PACI with fees, and eleven (11) months probation.

5. On or around December 2, 2002, the Respondent pled guilty in Allen County Superior Court to two counts of Aiding Theft, a Class D Felony under Cause number 02D04-0204-FD-00264. Respondent was sentenced to one year and six months in Indiana Department of Corrections, suspended and sentenced to probation for one year and six months

6. On or around April 11, 2003, a Verified Petition for Revocation of Probation was filed in Allen County Superior Court for Respondent's failure to pay fees.

7. On or around June 9, 2003, the Respondent was charged with deception in Porter County Superior Court #4 after she submitted a check written for \$150.00 knowing that she did not have the funds to pay the balance of the check. The case was dismissed after the Respondent paid restitution and fees.

8. On or around August 14, 2003, a hearing was held in Allen County Superior Court regarding Respondent's probation violation. Respondent was ordered back to Probation

9. On or around November 21, 2003, a Verified Petition of Revocation of Probation was filed in Allen County Superior Court and a warrant issued.

10. On or around December 1, 2003, the Respondent was arrested by officer for the Portage Police Department for an outstanding warrant from Allen County. The police discovered four (4) small yellow Ziploc baggies containing a substance which was later discovered to be heroin.

11. On or around March 29, 2004, the Respondent pled guilty to Possession of a Controlled Substance, a Class D Felony under Cause number 64D02-0312-FD-10607.

12. On or around May 17, 2004, the Respondent was sentenced to one (1) year in the Indiana Department of Corrections under Cause number 64D02-0312-FD-10607. She was further ordered to undergo substance abuse treatment while she was in Porter County Jail and she must submit proof of completion of Intensive Outpatient Treatment.

13. On or around June 22, 2004, the suspended portion of the Respondent's original conviction of Aiding Theft, a Class D Felony in Allen County under Cause number 02D04-0204-FD-00264, was revoked. Respondent was committed to the Indiana Department of Corrections

for one year and six months and the sentence was ordered to run consecutive to her Porter County sentence under Cause number 64D02-0312-FD-10607.

COUNT I

Respondent violated Indiana Code §25-1-9-4(a)(2) in that the Respondent has been convicted of a crime that has a direct bearing on her ability to continue to practice competently as evidenced by her 2002 conviction of Aiding in Conversion, a Class A Misdemeanor and her 2004 conviction of Possession of a Controlled Substance, a Class D Felony.

COUNT II

Respondent violated Indiana Code §25-1-9-4(a)(4)(D) in that the Respondent has continued to practice although the Respondent has become unfit to practice due to addiction to, abuse of, or severe dependency upon alcohol or other drugs that endanger the public by impairing the Respondent's ability to practice safely.

WHEREFORE, Petitioner demands an order against the Respondent that:

1. Imposes the appropriate disciplinary sanction;
2. Directs Respondent to immediately pay all costs incurred in the prosecution of this case; and;
3. Provides any further relief as the Board deems just and proper.

Respectfully submitted,

Steve Carter,
Attorney General of Indiana

By:

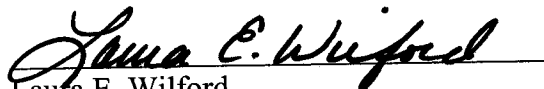


Laura E. Wilford
Deputy Attorney General
Attorney No.: 24446-49

CERTIFICATE OF SERVICE

I certify that a copy of the "Complaint" has been duly served upon the Respondent listed below, by United States mail, first-class, postage prepaid, on this 5th day of December, 2005.

Tracey Lynn Rambo, LPN
642 E. North Street, Apt. 10
Kendallville, IN 46755


Laura E. Wilford
Deputy Attorney General
Attorney No.: 24446-49

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