

STATE OF INDIANA,)
)
 Petitioner,)
)
 v.)
)
 HAROLD D. RAMSEY, L.P.N.)
 License Number: 27035287A,)
)
 Respondent.)

FILED
MAY 21 2003
HEALTH PROFESSIONS
BUREAU

COMPLAINT

The State of Indiana, by counsel, Deputy Attorney General, James R. Holden, on behalf of the Office of the Attorney General ("Petitioner"), and pursuant to Indiana Code § 25-1-7-7 et seq., 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 et. seq. files its Complaint against the nursing license of Harold D. Ramsey, L.P.N. ("Respondent"), and in support alleges and states:

COUNT I

1. Respondent is a licensed nurse in the State of Indiana having been issued license number 27035287A. Respondent's address on file with the Board is 2828 Silver Creek Drive, New Albany, IN 47150.

2. On or around January 15, 1999, Respondent became employed at Harrison County Hospital ("Hospital").

3. Respondent worked at Hospital until he was terminated on or around January 3, 2000, for drug diversion.

4. Respondent breached Hospital protocol by taking potassium chloride from a drug cart on several occasions and storing it in his locker.

5. On or about October 31, 2000, Respondent applied for renewal as a Licensed Practical Nurse, and he answered "no" to question five, which asked if he had ever been terminated in his practice as a nurse.

6. Respondent knowingly engaged in fraud in order to obtain a license to practice in violation of Indiana Code 25-1-9-4(a)(1)(A).

7. Respondent diverted a drug issued under a drug order in violation of 25-1-9-4(a)(8)(B).


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

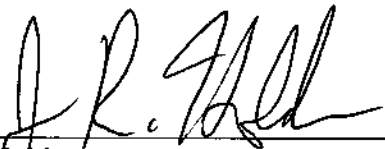
By:


James R. Holden
Deputy Attorney General
Attorney No.: 23003-49

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 21st day of May, 2003.

Harold D. Ramsey, L.P.N.
2828 Silver Creek Drive
New Albany, IN 47150



James R. Holden
Deputy Attorney General
Attorney No. 23003-49

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