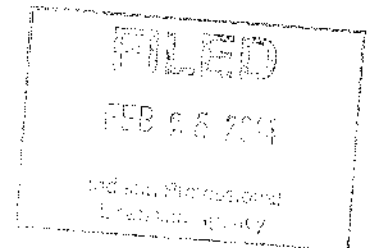


**BEFORE THE INDIANA
BOARD OF PHARMACY
2014 IBP 0008**

**IN THE MATTER OF THE LICENSE OF
KELLY LAUREN AKERS, C. PH.T.,
LICENSE NO. 67019040A (ACTIVE)**

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COMPLAINT

This complaint is brought against the pharmacy technician certification of Kelly Lauren Akers, C. Ph. T. ("Respondent"), by the Office of the Attorney General, by counsel, Deputy Attorney General Darren R. Covington, on behalf of the State of Indiana ("Petitioner") and pursuant to Ind. Code § 25-1-7-7, Ind. Code § 25-1-5-3, Ind. Code ch. 25-26-19, the Administrative Orders and Procedures Act, Ind. Code art. 4-21.5 and Ind. Code ch. 25-1-9 and in support alleges and states:

FACTS

1. Respondent's address on file with the Indiana Professional Licensing Agency is 2510 Swan Sea Drive, Indianapolis, Indiana 46239.
2. Respondent is a licensed pharmacy technician in the State of Indiana having been issued license number 67019040A on February 23, 2011.
3. At all times relevant herein, Respondent was employed as a pharmacy technician with CVS Pharmacy in Indianapolis, Indiana.
4. On or around December 2, 2013, CVS Pharmacy reported to the Drug Enforcement Agency (DEA) a loss of 690 tablets of hydrocodone 5/325 mg and 2,075 tablets of alprazolam 0.5 mg due to employee diversion.

5. In a signed statement, dated November 27, 2013, Respondent admitted to CVS Pharmacy Loss Prevention that she had stolen merchandise from two CVS stores as well as Norco and alprazolam. Respondent did not admit to the diversion of all the hydrocodone and alprazolam that was reported as a loss to the DEA.

COUNT I

6. Paragraphs 1 through 5 are incorporated by reference herein.

7. Respondent violated Ind. Code § 25-1-9-4(a)(8)(A) in that Respondent has diverted a legend drug as evidenced by her signed statement admitting to diverting hydrocodone and alprazolam.

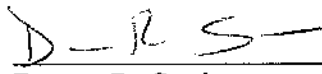
WHEREFORE, Petitioner demands an order against the Respondent that:

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,

Gregory F. Zoeller
Attorney General of Indiana
Atty. No. 1958-98

By:



Darren R. Covington
Deputy Attorney General
Attorney No. 28511-16

CERTIFICATE OF SERVICE

I certify that a copy of the "Complaint" has been duly served upon the Respondent, by
United States mail, first-class, postage prepaid, on this 25th day of February, 2014.

Kelly Akers
2510 Swan Sea Dr.
Indianapolis, IN 46239

By:


Darren R. Covington
Deputy Attorney General
Attorney No. 28511-16

OFFICE OF THE INDIANA ATTORNEY GENERAL
Indiana Government Center South
302 West Washington St., Fifth Floor
Indianapolis, IN 46204-2770
Telephone Number: 317-233-6506
Facsimile Number: 317-233-4393
Email: darren.covington@atg.in.gov