

BEFORE THE INDIANA  
BOARD OF PHARMACY  
2013 IBP 112

IN THE MATTER OF THE PHARMACY  
TECHNICIAN CERTIFICATION OF

KATHRYN LOUISE BARRETT, C. PH. T.  
LICENSE NO. 67021737A (SUMMARY SUSPENSION)

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**COMPLAINT**

This complaint is brought against the pharmacy technician certification of Kathryn Louise Barrett, C.Ph.T. ("Respondent"), by the Office of the Attorney General, by counsel, Deputy Attorney General Amanda R. Elizondo, 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 3686 Shoreline Drive, Greenwood, Indiana 46143.
2. Respondent is a certified pharmacy technician in the State of Indiana having been issued certification number 67021737A on September 26, 2012.
3. At all times relevant herein, Respondent was employed as a certified pharmacy technician with Walgreens Pharmacy #4592 in Greenwood, Indiana ("Walgreens").
4. On August 27, 2013, the Pharmacy Manager of Walgreens notified the Walgreens Loss Prevention Manager that a customer had called and stated that she had been shorted twelve tablets of hydrocodone 10/325 tablets on August 23, 2013. The Pharmacy Manager stated that he reviewed the CCTV, and that the video revealed that Respondent placed the hydrocodone in

question in her pocket. The Pharmacy Manager stated that another customer had called and stated that they were shorted tablets on August 19, 2013, and review of the CCTV footage revealed the Respondent placed the tablets in her pocket on August 19.

5. On August 28, 2013, the Loss Prevention Manager interviewed the Respondent, and the Respondent admitted to taking seventy (70) hydrocodone tablets and ten (10) oxycodone tablets. Respondent admitted in a signed written statement on August 28, 2013 to being addicted to prescription pain killers since late 2012 after she had a concussion. The Loss Prevention Manager terminated the Respondent's employment, and notified the Indiana State Police.

6. On or around October 21, 2013, Respondent was charged in Johnson County, Indiana Circuit Court with Theft, a Class D Felony, under Cause Number 41C01-1310-FD-000700. A jury trial is currently scheduled for June 4, 2014.

### **VIOLATIONS**

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

8. Respondent violated Ind. Code § 25-1-9-4(a)(8)(A) in that Respondent diverted a legend drug as evidenced by her unauthorized removal of oxycodone and hydrocodone from Walgreens Pharmacy.

9. Respondent violated Ind. Code § 25-1-9-4(a)(4)(D) in that Respondent continued to practice although she became unfit to practice due to abuse of, addiction to, or severe dependency upon drugs that impair her ability to practice safely as evidenced by Respondent's admitted diversion of and addiction to oxycodone and hydrocodone.

**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:

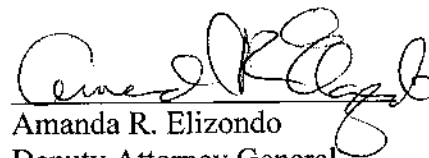
  
Amanda R. Elizondo  
Deputy Attorney General  
Attorney No. 30243-53

**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 29<sup>th</sup> day of April, 2014.

Kathryn Barrett  
3686 Shoreline Dr.  
Greenwood, IN 46143

By:

  
Amanda R. Elizondo  
Deputy Attorney General  
Attorney No. 30243-53

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