

**BEFORE THE INDIANA
BOARD OF PHARMACY
CAUSE NUMBER: 2013 IBP 0044**

**IN THE MATTER OF THE INDIANA
PHARMACIST LICENSE OF:**

JARED LEE BACHMAN, R. PH.,

LICENSE NUMBER: 26021573A

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FILED

APR 29 2014

Indiana Professional
Licensing Agency

COMPLAINT

This complaint is brought against the pharmacist license of Jared Lee Bachman, R. Ph. ("Respondent"), by the Office of the Attorney General, by counsel, Deputy Attorney General Joshua W. Timmons, 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. 25-26-13, 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 8334 Hampton Circle E., Indianapolis, Indiana 46256.
2. Respondent is a licensed pharmacist in the State of Indiana having been issued license number 26021573A on September 10, 2004.
3. At all times relevant herein, Respondent was employed as a staff pharmacist with Target Pharmacy #1366, located in Carmel, Indiana ("Target").
4. On or around February 11, 2013, Target initiated an investigation into incorrect counts of medication. Respondent was suspected by Target Asset Protection ("TAP") personnel on or around February 14, 2013 when TAP personnel observed Respondent using unusual practices while handling medication.

5. On or around February 15, 2013, TAP personnel observed Respondent diverting medication into a prescription container, which he was then observed placing into his pocket. When confronted, Respondent produced the observed prescription bottle from his pocket, which contained 161 zolpidem tablets and one (1) Cialis tablet.

6. Respondent admitted verbally to TAP personnel and to Carmel Police Officer Adam Theis that he had diverted a significant amount of zolpidem over a period of several months. Respondent then signed a voluntary statement admitting to diverting drugs and indicated that he was addicted to zolpidem.

7. On or around April 8, 2013, the Indiana Board of Pharmacy summarily suspended Respondent's license indefinitely in accord with a suspension agreement between Respondent and Petitioner.

8. On or around February 20, 2013, Respondent was charged in Hamilton County, Indiana, with Theft, a Class D Felony, in Cause No. 29D06-1302-FD-001347.

9. On or around September 11, 2013, Respondent entered a guilty plea to Theft, a Class D Felony. Respondent was sentenced to 545 days, with 365 days suspended, four (4) days jail credit, and the executed sentence served by electronically monitored home detention. Respondent is also required to attend three (3) twelve-step meetings per week and abstain from any association with alcohol.

COUNT I

10. Paragraphs 1 through 9 are incorporated by reference herein.

11. Respondent violated Ind. Code § 25-1-9-4(a)(8)(A) in that Respondent has diverted a legend drug as evidenced by his verbal and written statements admitting to diverting zolpidem and Cialis tablets.

COUNT II

12. Paragraphs 1 through 9 are incorporated by reference herein.

13. Respondent violated Ind. Code § 25-1-9-4(a)(4)(D) in that Respondent has continued to practice despite being unfit to practice due to an addiction to, abuse of, or severe dependence on alcohol or other drugs as evidenced by his verbal and written statements indicating an addiction to zolpidem.

COUNT III

14. Paragraphs 1 through 9 are incorporated by reference herein.

15. Respondent has violated Ind. Code § 25-1-9-4(a)(2)(A) in that Respondent has been convicted of a crime which has direct bearing on Respondent's ability to practice safely as evidenced by his conviction for Theft, a Class D Felony, in Cause No. 29D06-1302-FD-001347.

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:


Joshua W. Timmons
Deputy Attorney General
Attorney No. 30932-49

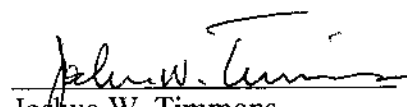
CERTIFICATE OF SERVICE

I certify that a copy of the "Complaint" has been duly served upon the Respondent and Respondent's counsel, by United States mail, first-class, postage prepaid, on this ^{29th}~~28~~th day of April 2014.

Jared Bachman
8334 Hampton Circle E.
Indianapolis, IN 46256

Katherine E. Winders, Esq.
Plews Shadley Racher & Braun LLP
1346 North Delaware St.
Indianapolis, IN 46202

By:


Joshua W. Timmons
Deputy Attorney General
Attorney No. 30932-49

OFFICE OF THE INDIANA ATTORNEY GENERAL
Indiana Government Center South
302 West Washington St., Fifth Floor
Indianapolis, IN 46204-2770
Telephone Number: 317-234-7137
Facsimile Number: 317-233-4393
Email: josh.timmons@atg.in.gov