

BEFORE THE INDIANA STATE
BOARD OF PHARMACY
CAUSE NUMBER: 2004 IBP 0033

STATE OF INDIANA,

Petitioner,

v.

KATHRYN T. WROBLEWSKI,
LICENSE NUMBER: 67003506,

Respondent.

FILED

AUG 31 2004

HEALTH PROFESSIONS
BUREAU

COMPLAINT

The State of Indiana, by counsel, Deputy Attorney General, Shelley M. Johnson, 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 §25-26-13-4 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 Indiana State Board of Pharmacy's license of Kathryn T. Wroblewski ("Respondent"), and in support alleges and states:

COUNT 1

1. Respondent's address on file with the Board is 208 Sharon Boulevard, Chesterton, Indiana 46304 and she is a licensed pharmacy technician in the State of Indiana holding license number 67003506.

2. Respondent worked as a pharmacy technician at CVS Pharmacy, 2004 N. Calumet Avenue, Valparaiso, Indiana 46383 from March 23, 1999 until June 29, 2004

3. On or about June 24, 2004, Anthanasios Tsagris, R.Ph., Pharmacy Manager, received

a telephone call from Robert Taylor, Investigator from the Porter County Prosecutor's Office. Mr. Taylor informed Mr. Tsagris that the Respondent had been stealing generic Vicodin from the CVS Pharmacy on Calumet Avenue, according to an anonymous tip received by the Porter County Prosecutor's Office.

4. On or about June 24, 2004 and June 25, 2004, Mr. Tsagris informed both his District Manager and Loss Prevention Representative, Reggie Beal of the information received from the Porter County Prosecutor's Office of the allegation that the Respondent had been diverting generic Vicodin.

5. On or about June 29, 2004, Mr. Tsagris and Mr. Beal confronted the Respondent about diverting generic Vicodin from CVS Pharmacy. The Respondent indicated that she took the generic Vicodin tablets and gave them to an individual that used to work for CVS Pharmacy. Respondent confessed in writing that she would divert 20-25 tablets twice per month from the months of October 2003, to April, 2004. Respondent stated that she had diverted approximately three hundred and fifty (350) generic Vicodin tablets from the pharmacy.

6. Respondent's signed written statement explained that she had diverted the generic Vicodin by placing the pills in an envelope while the pharmacist on duty went to the restroom. Respondent additionally signed a promissory note to CVS Pharmacy in the amount of three hundred and twenty dollars \$320.00 for the cost of the generic Vicodin.

7. Respondent was terminated from CVS Pharmacy as a result of the above-described conduct on or about June 29, 2004.

8. The conduct described above constitutes a violation of Indiana Code § 25-1-9-4(a)(1)(B) in that the practitioner has engaged in fraud or material deception in the course of

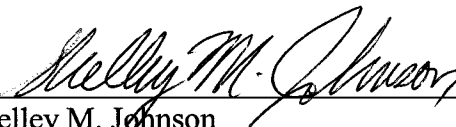
professional services or activities; Indiana Code § 25-1-9-4(a)(8) in that the practitioner has diverted a legend drug.

WHEREFORE, Petitioner demands an order against the Respondent, that:

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

Respectfully submitted,

STEVE CARTER
Attorney General of Indiana

By: 
Shelley M. Johnson
Deputy Attorney General
Attorney No.:22412-49

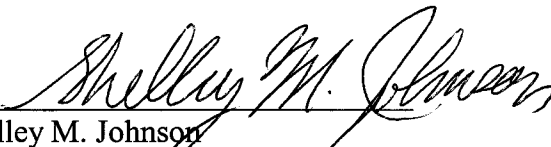
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing "Complaint" has been served upon the Respondent listed below, by United States mail, first class postage prepaid, on this 31st day of August, 2004:

Kathryn T. Wroblewski
208 Sharon Blvd.
Chesterton, IN 46304

David Butterfield, Esq.
11 Lincolnway
Valparaiso, Indiana 46383


Shelley M. Johnson
Deputy Attorney General

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