

**BEFORE THE INDIANA
BOARD OF PHARMACY
2013 IBP 0004**

**IN THE MATTER OF THE LICENSE OF
JEFFREY S. DUNN, C.PH.T.
LICENSE NO. 67020041A (EXPIRED)**

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COMPLAINT

This complaint is brought against the pharmacy technician license of Jeffrey S. Dunn, 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. 25-26-13, 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 651 Wheatland Lane, Whiteland, Indiana 46184.
2. Respondent is a licensed pharmacy technician in the State of Indiana having been issued license number 67020041A on September 22, 2011.
3. At all times relevant herein, Respondent was employed as a pharmacy technician with CVS Pharmacy in Indianapolis, Indiana.
4. On or around May 25, 2012, Respondent's employment was terminated from CVS Pharmacy after he admitted to loss prevention personnel to diverting phentermine.
5. The Indianapolis Metropolitan Police Department was called and Respondent consented to a search of his vehicle. Phentermine and hydrocodone were found. Respondent did not have prescriptions for these.

6. As of December 12, 2012, criminal charges have not been filed.

COUNT I

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 Respondent's possession of phentermine and hydrocodone without a prescription and Respondent's admission to taking phentermine from CVS Pharmacy without proper authorization.

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: D-R-S-

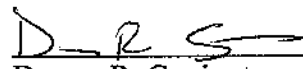
Darren R. Covington
Deputy Attorney General
Attorney No. 28511-16

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 14th day of January, 2013.

Jeffrey Dunn
651 Wheatland Ln.
Whiteland, IN 46184

By:


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

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