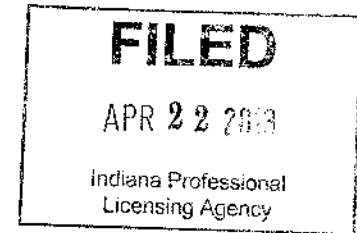


BEFORE THE INDIANA
BOARD OF PHARMACY
2013 IBP 0033

IN THE MATTER OF THE CERTIFICATION OF)
ARIELLE L. FREEMAN, C.PH.T.)
LICENSE NO. 67021019A (SUMMARY SUSPENSION))



COMPLAINT

This complaint is brought against the pharmacy technician certification of Arielle L. Freeman, 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 of record with the Indiana Professional Licensing Agency is P.O. Box 2021, West Lafayette, Indiana 47996.
2. Respondent is a certified pharmacy technician in the State of Indiana having been issued certification number 67021019A on May 23, 2012.
3. At all times relevant herein, Respondent was employed as a pharmacy technician with Target Stores ("Target") in Lafayette, Indiana.
4. On or around January 24, 2013, Respondent admitted to diverting controlled substances for personal use in a written statement given to Target.
5. In her written statement, Respondent admitted to diverting as much as 180 prescription drug tablets per week.

6. On or around February 14, 2013, Target submitted a DEA Form 106 Report of Theft or Loss of Controlled Substances, which reported 1,227 missing clonazepam tablets, 10,664 missing hydrocodone tablets, and 5,614 missing alprazolam tablets.

7. On or around March 11, 2013, the Indiana Board of Pharmacy summarily suspended Respondent's license for ninety days.

COUNT I

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

9. Respondent is subject to disciplinary sanctions pursuant to Ind. Code § 25-1-9-4(a)(8)(A) in that Respondent has diverted a legend drug as evidenced by her misappropriation of drugs from Target for her own personal use.

COUNT II

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

11. Respondent is subject to disciplinary sanctions pursuant to Ind. Code § 25-1-9-4(a)(4)(D) in that Respondent has continued to practice although he has become unfit to practice due to addiction to, abuse of, or severe dependency upon alcohol or other drugs that impair his ability to practice as evidenced by Respondent's illicit use of controlled substances.

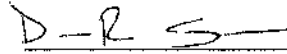
WHEREFORE, Petitioner demands an order against the Respondent that:

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:

A handwritten signature in dark ink, appearing to read "D-R S", written over a horizontal line.

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 22nd day of April, 2013.

Arielle L. Freeman
PO Box 2021
West Lafayette, IN 47996

By:

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

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