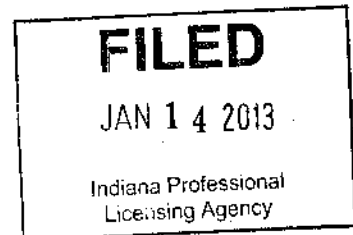


BEFORE THE INDIANA
BOARD OF PHARMACY
2012 IBP 0086

IN THE MATTER OF THE LICENSE OF)
JORDAN MAXIMITO HENDERSON, C.PH.T.)
LICENSE NO. 67016782A (SUMMARY SUSPENSION))



COMPLAINT

This complaint is brought against the pharmacy technician license of Jordan Maximito Henderson, 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 225 Carter Road, Michigan City, Indiana 46360.
2. Respondent is a licensed pharmacy technician in the State of Indiana having been issued license number 67016782A on November 25, 2009.
3. At all times relevant herein, Respondent was employed as a pharmacy technician with CVS Pharmacy in LaPorte, Indiana.
4. In a signed statement dated September 27, 2012, Respondent admitted to CVS Pharmacy loss prevention management that beginning in June 2012 he began diverting one to two bottles of hydrocodone per shift, for a total of approximately 90 bottles diverted. Additionally, Respondent admitted that he diverted three bottles of alprazolam and four bottles

of promethazine. Respondent then sold these bottles to an individual who would sell the drugs to users.

5. On or around October 11, 2012, Respondent was charged in LaPorte County, Indiana Circuit Court with two counts of Theft, a Class D Felony; one count of Possession of Marijuana, a Class A Misdemeanor; two counts of Possession of a Controlled Substance, a Class D Felony; and Dealing in a Controlled Substance, a Class B Felony, under Cause Number 46C01-1210-FB-000506.

6. On or around November 5, 2012, the Indiana Board of Pharmacy summarily suspended Respondent's license for ninety days.

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 has diverted a legend drug as evidenced by Respondent's admission that he took alprazolam, hydrocodone and promethazine 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.

Jordan Henderson
225 Carter Rd.
Michigan City, IN 46360

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

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