

BEFORE THE INDIANA
BOARD OF PHARMACY
2013 IBP 0040

IN THE MATTER OF THE LICENSE OF)
JESSICA L. JACKMAN, P.T.I-T.)
LICENSE NO. 99054264A (ACTIVE))

FILED

APR 03 2013

Indiana Professional
Licensing Agency

PETITION FOR SUMMARY SUSPENSION

The State of Indiana ("Petitioner"), by Counsel, Office of the Indiana Attorney General, by Deputy Attorney General Darren R. Covington, moves the Indiana Board of Pharmacy ("Board") to summarily suspend the pharmacy technician-in-training license of Jessica L. Jackman, P.T.I-T. ("Respondent") for ninety (90) days and in support of its petition states the following:

1. This Board has jurisdiction to suspend Respondent's license in accordance with the provisions of Ind. Code ch. 4-21.5-4 and Ind. Code § 25-1-9-10.

2. Respondent's address on file with the Indiana Professional Licensing Agency is 524 West 42nd Street, Indianapolis, Indiana 46208.

3. Respondent is a licensed pharmacy technician-in-training in the State of Indiana having been issued license number 99054264A on October 10, 2012.

4. At all times relevant herein, Respondent was employed as a pharmacy technician-in-training with CVS Pharmacy ("CVS") in Indianapolis, Indiana.

5. On or around January 3, 2013, CVS reported three separate incidents of theft of prescription narcotics.

6. As a result, CVS fired Respondent for theft, and the Indianapolis Marion County Police Department opened an investigation.

7. On or around February 13, 2013, CVS submitted a DEA Form 106 Report of Theft or Loss of Controlled Substances, which reported about 817 missing hydrocodone tablets, a Class III Controlled Substance.

8. On or around March 8, 2013, Respondent was charged in Marion County, Indiana Superior Court with Theft and Possession of a Controlled Substance, both Class D Felonies, under Cause Number 49G14-1303-FD-008564.

9. Due to the above facts, Respondent represents a clear and immediate danger to the public health and safety if allowed to continue to practice as a pharmacy technician-in-training in Indiana.

WHEREFORE, the State of Indiana requests that this Board set a hearing on this Petition for Summary Suspension and suspend Respondent's license for a period of ninety (90) days and for all other proper relief.

Respectfully submitted,

Gregory F. Zoeller
Attorney General of Indiana
Atty. No. 1958-98

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

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing "Petition for Summary Suspension" has been sent to the Respondent's last known address by first-class mail, on this 3rd day of April, 2013.

Jessica L. Jackman
524 W 42nd Street
Indianapolis, IN 46208

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

Office of the Attorney General
Indiana Government Center South
302 W Washington Street, 5th Floor
Indianapolis, IN 46204
Telephone (317) 233-6506
Facsimile (317) 233-4393
darren.covington@atg.in.gov