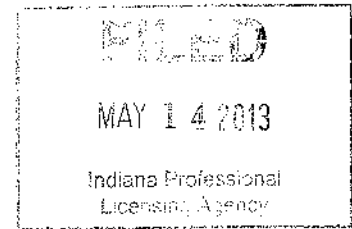


BEFORE THE INDIANA
BOARD OF PHARMACY
2013 IBP 0040

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



COMPLAINT

This complaint is brought against the pharmacy technician-in-training license of Jessica L. Jackman, P.T.I-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 524 West 42nd Street, Indianapolis, Indiana 46208.
2. Respondent is a licensed pharmacy technician-in-training in the State of Indiana having been issued license number 99054264A on October 10, 2012.
3. At all times relevant herein, Respondent was employed as a pharmacy technician-in-training with CVS Pharmacy ("CVS") in Indianapolis, Indiana.
4. On or around January 3, 2013, CVS reported three separate incidents of theft of prescription narcotics.
5. As a result, CVS fired Respondent for theft, and the Indianapolis Marion County Police Department opened an investigation.

6. 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.

7. 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.

8. On or around April 8, 2013, the Indiana Board of Pharmacy summarily suspended Respondent's license for ninety days.

COUNT I

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

10. Respondent violated Ind. Code § 25-1-9-4(a)(8)(A) in that Respondent has diverted a legend drug as evidenced by Respondent's theft of controlled substances from CVS.

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 May, 2013.

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

By:

D-R S-

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

OFFICE OF THE INDIANA ATTORNEY GENERAL

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