

**BEFORE THE INDIANA
BOARD OF PHARMACY
2013 IBP 0071**

IN THE MATTER OF THE LICENSE OF

RAVEN Y. MERKERSON, P.T.I-T

LICENSE NUMBER 99046339A (EXPIRED)

FILED

JUL 25 2013

Indiana Professional
Licensing Agency

COMPLAINT

This complaint is brought against the pharmacy technician-in-training license of Raven Y. Merkerson, 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 4807 Larkspur Drive, East Chicago, Indiana, 46312.
2. Respondent is a licensed pharmacy technician-in-training in the State of Indiana having been issued license number 99046339A on March 23, 2011.
3. On March 23, 2012, Respondent's license expired.
4. At all times relevant herein, Respondent was a pharmacy technician-in-training at Target Pharmacy T-1913 in Munster, Indiana.

5. During an investigation of diversion and theft of controlled substances from Target Pharmacy T-1913, Respondent was discovered working on an expired pharmacy technician-in-training license.

6. On or around January 16, 2013, Respondent signed a statement admitting to diverting 6,400 tablets of hydrocodone.

7. Respondent delivered hydrocodone pills to a third party, beginning in October 2012, for a payment of \$300 for each delivery.

8. On or around March 15, 2013, Respondent was charged in Lake County, Indiana Superior Court, with four counts of Dealing in a Controlled Substance, a Class B Felony, under Cause Number 45G04-1303-FB-00027. As of July 25, 2013, these charges were still pending.

COUNT I

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

10. Respondent violated Ind. Code § 25-1-9-4(a)(3) in that Respondent knowingly violated Ind. Code § 25-26-19-9(b) as evidenced by Respondent continuing to practice on an expired license.

COUNT II

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

12. 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 she stole 6,400 tablets of hydrocodone from Target Pharmacy T-1913.

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 25th day of July, 2013.

Raven Y. Merkersen
4807 Larkspur Dr.
East Chicago, IN 46312

By:

D - R S -

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

OFFICE OF THE INDIANA ATTORNEY GENERAL

Indiana Government Center South
302 West Washington St., Fifth Floor
Indianapolis, IN 46204-2770
Telephone Number: 317-233-6506
Facsimile Number: 317-233-4393
Email: darren.covington@atg.in.gov