

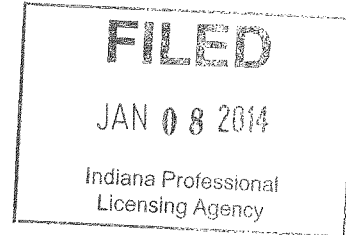
**BEFORE THE INDIANA  
BOARD OF PHARMACY**

**CAUSE NO: 2014 IBP 0001**

**IN THE MATTER OF THE INDIANA  
PHARMACY LICENSE OF**

**PAUL'S LTC PHARMACY  
LICENSE NUMBER 60006285A (ACTIVE)**

)  
)  
)  
)  
)



**COMPLAINT**

This complaint is brought against the pharmacy license of Paul's LTC Pharmacy ("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 2345 W. Franklin Street, Suite 201B, Evansville, Indiana 47712.
2. Respondent is a licensed pharmacy in the State of Indiana having been issued license number 60006285A on January 5, 2012.
3. On or around May 29, 2013, a Drug Enforcement Administration ("DEA") Form 106 was submitted by Respondent to the DEA reporting the diversion of 63 Vyvanse capsules.
4. Qualifying pharmacist Ryan Scott Anslinger, R. Ph. ("Anslinger") informed an Indiana Board of Pharmacy Compliance Officer that he witnessed Anirudh Gade ("Gade") place something in his pocket and confronted him.
5. A search of Gade's pockets revealed 7 Vyvanse capsules. An inventory check showed that 63 Vyvanse capsules were missing.

6. During a May 31, 2013 visit from the Compliance Officer, there was no copy of Gade's pharmacy technician license available. A social security number check revealed that Gade did not possess a training permit or license. Gade's employment file included no licensure information.

7. Anslinger claimed that Gade had passed a license check and was supposed to be working as a technician-in-training pending approval of a pharmacy technician license.

**COUNT I**

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

9. Respondent violated Ind. Code § 25-1-9-4(a)(13) in that Respondent assisted Gade in working as a pharmacy technician-in-training or pharmacy technician without a permit in violation of Ind. Code § 25-26-19-9.

**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 6<sup>th</sup> day of January, 2014.

Paul's LTC Pharmacy  
2345 W. Franklin St., Suite 201B  
Evansville, IN 47712

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](mailto:darren.covington@atg.in.gov)