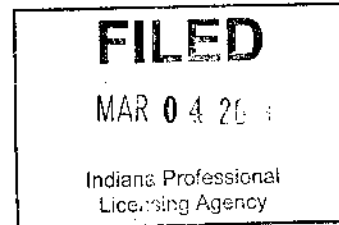


**BEFORE THE INDIANA
BOARD OF PHARMACY
2013 IBP 0031**

**IN THE MATTER OF THE INDIANA)
NON-RESIDENT PHARMACY LICENSE OF)
)
POSTAL PRESCRIPTION SERVICES)
LICENSE NUMBER 64000223A (ACTIVE))**



COMPLAINT

This complaint is brought against the non-resident pharmacy license of Postal Prescription Services (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 3500 Southeast 26th Avenue, P.O. Box 2718, Portland, Oregon, 97202.
2. Respondent is a licensed non-resident pharmacy in the State of Indiana having been issued license number 64000223A on May 23, 2000.
3. Respondent also holds a pharmacy license in Oregon.
4. On or around August 15, 2012, the Board of Pharmacy of the State of Oregon filed a "Notice of Proposed Disciplinary Action" against Respondent alleging that between February 22 and June 6, 2012, Respondent allowed unlicensed individuals to perform the duties of a pharmacy technician without a pharmacy technician license.

5. On or around September 6, 2012, Respondent signed a "Consent Order" agreeing to pay a civil penalty in the amount of \$5,000.00.

6. In a letter to the Petitioner, dated October 29, 2012, Respondent indicated that the person in question who was performing pharmacy technician duties without a license, was employed through a temporary agency as a customer service representative to answer telephones. This individual would place refill requests, which require a pharmacy technician license under Oregon law.

COUNT I

7. Paragraphs 1 through 6 are incorporated by reference herein.

8. Respondent violated Ind. Code § 25-1-9-4(a)(7) in that Respondent has had disciplinary action taken against its Oregon license on grounds similar to Ind. Code § 25-1-9-4(a)(3) and (13), for permitting unlicensed individuals to perform duties for which a license is required.

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

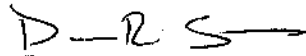
By: D-R S
Darren R. Covington
Deputy Attorney General
Attorney No. 28511-16

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 4th day of March, 2013.

Postal Prescription Services
P.O. Box 2718
Portland, OR 97202

By:



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

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