

BEFORE THE INDIANA
BOARD OF PHARMACY
2014 IBP 0027

IN THE MATTER OF THE LICENSE OF)
)
KARRIE ANN WORTHINGTON, C. PH.T.,)
)
LICENSE NO. 67008344A (ACTIVE))



COMPLAINT

This complaint is brought against the pharmacy technician license of Karrie Ann Worthington, C. Ph.T. (“Respondent”), by the State of Indiana, Deputy Attorney General Maritza K. Webb, on behalf of the Office of the Attorney General (“Petitioner”) and pursuant to Indiana Code § 25-1-7-7, Indiana Code §25-1-5-3, Indiana Code art. 25-22.5, the Administrative Orders and Procedures Act, Indiana Code ch. 4-21.5-3, and Indiana 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 1409 C Street, LaPorte, Indiana 46350.
2. Respondent is a licensed pharmacy technician in the State of Indiana having been issued license number 67008344A on August 12, 2005.
3. At all times relevant herein, Respondent was employed as a pharmacy technician with CVS Pharmacy #06483 in LaPorte, Indiana (“CVS”).
4. On or around September 22, 2013, CVS began an investigation into the loss of hydrocodone 10/660 tablets. As part of this investigation, CVS installed covert

cameras in the pharmacy to observe the area where the bottles of hydrocodone were stored.

5. On or around October 7, 2013, CVS reviewed camera footage from October 4 and October 5, 2013 after losses of hydrocodone 10/660 tablets were noted for both those days.

6. Camera footage showed Respondent handling the bottle containing hydrocodone 10/660 tablets on both October 4 and October 5. Respondent was the only individual who handled the drug bottle on both days.

7. On or about October 9, 2013, the bottle containing hydrocodone 10/600 tablets was then moved to a different location in the pharmacy by another pharmacy technician. The covert cameras were repositioned to cover the new location.

8. Respondent was again observed handling the bottle containing hydrocodone 10/660 tablets on October 11 and 12, 2013. Respondent was the only individual observed handling the drug bottle on both days.

9. Losses of hydrocodone 10/660 tablets were noted on both October 11 and 12, 2013.

10. On or around October 17, 2013, Respondent was questioned about the losses and signed a statement admitting to diverting 100 hydrocodone 10/660 tablets over the previous six (6) months.

11. In the interview, Respondent stated that she took the drugs due to domestic trouble at home and a back injury that occurred several years prior.

12. On or around October 17, 2013, Respondent was terminated from her employment with CVS.

COUNT I

13. Paragraphs 1 through 12 are incorporated by reference herein.

14. Respondent violated Indiana Code § 25-1-9-4(a)(3) in that Respondent has knowingly violated a state statute regulating her profession. Specifically, Respondent violated Indiana Code 35-48-4-7 by intentionally possessing a Schedule II controlled substance without a valid prescription or order of a practitioner acting in the course of his professional license as evidenced by Respondent's removal of hydrocodone tablets from CVS pharmacy over a period of six months without a valid prescription or any authorization.

COUNT II

15. Paragraphs 1 through 12 are incorporated by reference herein.

16. Respondent violated Indiana Code § 25-1-9-4(a)(4) in that Respondent has continued to practice although unfit to practice due to addiction to, abuse of, or severe dependency upon drugs that endanger the public by impairing a practitioner's ability to practice safely, as evidenced by Respondent's removal of hydrocodone from the pharmacy, over a period of six months, without a prescription or any authorization, in order to use the drugs for her personal use in response to domestic troubles at home.

COUNT III

17. Paragraphs 1 through 12 are incorporated by reference herein.

18. Respondent violated Indiana Code § 25-1-9-4(a)(8)(A) in that Respondent has diverted a legend drug as evidenced by Respondent's removal of approximately 100

tablets of hydrocodone 10/660 tablets over a period of six months without a prescription or any authorization to remove the drugs from the pharmacy.

WHEREFORE, Petitioner demands an order against Respondent, that:

1. Imposes the appropriate disciplinary sanction;
2. Directs Respondent to pay all the cost incurred in the prosecution of this case;
3. Provides any other relief the Board deems just and proper.

Respectfully submitted,

GREGORY F. ZOELLER
Attorney General of Indiana
Attorney No. 1958-98

By: Maritza K. Webb
Maritza K. Webb
Deputy Attorney General
Attorney Number: 30904-49

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing "Complaint" has been sent to the Respondent's last known address by first-class mail, on this 18th day of May, 2014.

Karrie Worthington
1409 C Street
LaPorte, IN 46350

By:

Maritza K. Webb
Maritza K. Webb
Deputy Attorney General
Attorney Number: 30904-49

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