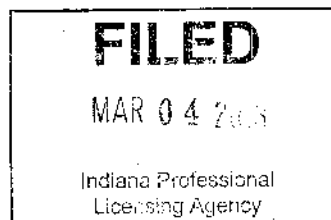


**BEFORE THE INDIANA  
BOARD OF PHARMACY  
2013 IBP 0026**

**IN THE MATTER OF THE INDIANA )  
PHARMACY TECHNICIAN LICENSE OF )  
 )  
NICOLE ANN SNODGRASS, C.PH.T. )  
LICENSE NUMBER 67007304A (ACTIVE) )**



**COMPLAINT**

This complaint is brought against the pharmacy technician license of Nicole Ann Snodgrass, C.Ph.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 2002 Grant Street, Terre Haute, Indiana 47802.
2. Respondent is a licensed pharmacy technician in the State of Indiana having been issued license number 67007304A on December 14, 2004.
3. At all times relevant herein, Respondent was employed as a pharmacy technician with CVS Pharmacy in Clinton, Indiana.
4. On or around May 17, 2012, Respondent signed a statement for CVS Pharmacy loss prevention in which she admitted to diverting approximately 5,900 tablets of hydrocodone between January and May 2012. Respondent stated that she delivered 500 count bottles of

hydrocodone to another individual, who in turn sold them. Respondent stated that she received approximately \$400 per bottle sold.

5. On or around November 8, 2012, Respondent was charged in Vermillion County, Indiana County Court with two counts of Dealing in a Controlled Substance, a Class B Felony, and three counts of Theft, a Class D Felony, under Cause Number 83C01-1211-FB-000018.

6. A jury trial is scheduled for April 30, 2013.

### **COUNT I**

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

8. 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 took 5,900 hydrocodone tablets without authorization from CVS Pharmacy.

**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 4<sup>th</sup> day of March, 2013.

Nicole Snodgrass  
2002 Grant St.  
Terre Haute, IN 47802

By:

D-R-S

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

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