

BEFORE THE INDIANA BOARD OF
PHARMACY
CAUSE NO.: 96 IBP 004

STATE OF INDIANA)
THE EMERGENCY SUSPENSION)
OF)
JANE DOE, R.Ph.)

FILED
MAR 08 1996
HEALTH PROFESSIONS
BUREAU

PETITION FOR SUMMARY SUSPENSION

The State of Indiana, by counsel, Andrew S. Peacock, Deputy Attorney General, moves the Indiana Board of Pharmacy ("Board") to suspend the license of Jane Doe, a registered pharmacist, for 90 days, and in support of its petition, states the following:

1. Jane Doe is a licensed registered pharmacist in the State of Indiana.
2. This Board has jurisdiction to summarily suspend the license of Jane Doe in accordance with the provisions of the Indiana Code § 4-21.5-4-3 *et seq.* and Indiana Code § 25-1-9-10.
3. If allowed to continue to practice pharmacy, Jane Doe presents a clear and immediate danger to the public health and safety for the following reasons:

3.1 Jane Doe, who worked as a "floating" pharmacist for a drug store chain in northwest Indiana, diverted medications from several pharmacies for her own use and for the use of her husband. She diverted both controlled substances and legend drugs including Stadol NS, Fastin, Adipex, Pondimin, Tenuate Dospan, Ionamin, and acetaminophen with codeine in violation of Ind. Code 25-1-9-4(a)(8)(A).

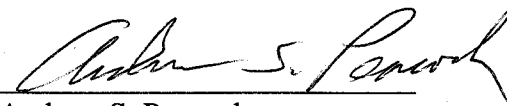
3.2 Jane Doe continued to practice pharmacy although she was diverting and using medications while on duty without a valid prescription. Jane Doe admitted to Fred Biggs, Inspector for the

Indiana Board of Pharmacy that she has a problem with substance abuse. Jane Doe's conduct is in violation of Ind. Code 25-1-9-4(a)(4)(D).

WHEREFORE, the State of Indiana requests that this Board set a hearing on this petition and suspend John Doe's license for 90 days and for all other proper relief.

Respectfully Submitted,

Pamela Carter
Attorney General of Indiana


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