# BEFORE THE INDIANA BOARD OF PHARMACY CAUSE NO: 202507-BOP-0023 IN THE MATTER OF THE CONTROLLED SUBSTANCE REGISTRATION OF: PATRICK SHEETS, M.D. LICENSE NO: 01054176B (ACTIVE) BEFORE THE INDIANA BOARD OF PHARMACY CAUSE NO: 202507-BOP-0023 July 03, 2025 Indiana Professional Licensing Agency

#### PETITION FOR SUMMARY SUSPENSION

The State of Indiana, Office of the Indiana Attorney General, herein ("Petitioner"), Deputy Attorney General Ryan P. Eldridge, pursuant to Ind. Code Ch. 4-21.5-4 *et seq.*, and Ind. Code Sec. 25-1-9-10, respectively submits to the Indiana Board of Pharmacy ("Board"), Petitioner's "Petition for Summary Suspension" ("Petition"), against the Controlled Substance Registration (C.S.R.) of Patrick Sheets, M.D. ("Respondent"). In support of its Petition, Petitioner alleges the following:

#### **FACTS**

- 1. The Office of the Attorney General ("OAG") is empowered under Ind. Code § 25-1-7-7 to prosecute this action on behalf of Petitioner against Respondent's license.
- 2. Respondent is a physician (M.D.) and holds license #01054176A, which was issued by the Medical Licensing Board of Indiana on May 17, 2001, and expires on October 31, 2025.
- 3. Respondent holds a Controlled Substance Registration (C.S.R.) #01054176B, which was issued by this Board on May 17, 2001, and expires on October 31, 2025.
- 4. Respondent's address on file with the Indiana Professional Licensing Agency ("IPLA") is 123 South McKinley Avenue, Rensselaer, Indiana 47978.

#### Jurisdiction

5. Between December 31, 2023, and July 11, 2024, the OAG received consumer complaints filed against Respondent, and an investigation was then initiated as authorized by

Ind. Code § 25-1-7-5(b)(4). The consumer complaints are attached herewith as Exhibit 1-Exhibit 3.

- 6. The investigation uncovered that Respondent's actions represent a clear and immediate danger to the public's health, safety, or property if allowed to continue to practice.
- 7. At all times relevant, Respondent was a "practitioner" as that term is defined by Ind. Code § 25-1-9-2.
- 8. Therefore, the Board has authority to hear this case and to summarily suspend Respondent's license in accordance with Ind. Code § 25-1-9-10 should the Board find Respondent represents a clear and immediate danger to the public's health, safety, or property if allowed to continue to practice.

# FACTS SUPPORTING CLEAR AND IMMEDIATE DANGER

- 9. Respondent utilized a controlled substance fob for prescribing of controlled substances to patients in Indiana.
- 10. Upon information and belief, Respondent allowed staff members to control and utilize his controlled substances fob with little to no oversight. In addition, Respondent allowed his controlled substance fob to be placed in non-secure locations like an unlocked mailbox outside of the practice location.
- 11. Upon information and belief, Respondent prescribed legend drugs and controlled substances to patients without a patient visit or evaluation.
  - 12. Upon information and belief, Respondent prescribed Adderall for weight loss.
- 13. Upon information and belief, Respondent engaged in romantic relationships with employees and patients, while simultaneously prescribing controlled substances to these individuals.

- 14. Upon information and belief, Respondent prescribed addictive and dangerous drugs (beyond Suboxone) to an addict.
- 15. Upon information and belief, Respondent failed to secure patient health care records and allowed them to be kept in an unlocked shed and other areas that made them susceptible to breach of confidentiality.
- 16. Upon information and belief, Respondent asked one (1) or more prior employees to fabricate medical records for one (1) or more patients.
- 17. On or about March 6, 2025, CVS Pharmacy terminated Respondent's ability to fill prescriptions for patients at any CVS pharmacy.
- 18. On or about June 17, 2025, Jasper County Health Department issued a Vacate Order for Sheets Family Practice, P.C. located at 123 S. McKinley Avenue, Rensselaer, Indiana 47978. The Order noted that the property had "no running water, no working sewage, and no electricity."
- 19. Upon information and belief, Sheets Family Practice, P.C. is the primary business location for Respondent's medical practice.

# <u>CHARGE – CLEAR AND IMMEDIATE DANGER TO THE PUBLIC</u>

20. Pursuant to Ind. Code § 25-1-9-10, Respondent represents a clear and immediate danger to the public health and safety if allowed to continue to practice.

WHEREFORE, pursuant to Ind. Code § 4-21.5-4, Petitioner requests that this Board set this matter for an emergency hearing on Petitioner's Petition, grant Petitioner's Petition, and suspend Respondent's license for a period of not more than ninety (90) days, and any other relief provided for by law.

Respectfully submitted,

THEODORE E. ROKITA Indiana Attorney General Attorney No. 18857-49

By:

Ryan P. Eldridge Deputy Attorney General Attorney No.: 34578-49

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Office of Attorney General Todd Rokita 302 West Washington Street Indiana Government Center South, 5<sup>th</sup> Floor Indianapolis, IN 46204 Email: Ryan.eldridge@atg.in.gov

Telephone: (317)-233-6247

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 3rd day of July, 2025, a true and correct copy of this Appearance and Petition for Summary Suspension was served upon the below-listed party or parties:

Patrick Sheets, M.D. 123 South McKinley Avenue Rensselaer, Indiana 47978 drpatricksheets@gmail.com By U.S. Mail and E-mail

Tom F. Hirschauer III Keffer Hirschauer, LLP Counsel for Patrick Sheets, M.D. 230 East Ohio Street, Suite 400 Indianapolis, IN 46204 tom@indyjustice.com By U.S. Mail and E-Mail

By:

Ryan P. Eldridge Deputy Attorney General Attorney No.: 34578-49

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## State Ex. 1

INSTRUCTIONS:

To prevent delay, please be sure to complete **both sides** of this form in full. Please print clearly or type. **Do not include your Social Security Number** on this form or in any accompanying documents. **Please note:** If you have already obtained a judgment, or there is pending litigation, we may be limited or unable to take further action on your complaint.

Case No: 11739676

Section 1: Vous Information										
Section 1: Your Information					Charak Address					
Salutation					Street Address					
□ Det. □ Mr. □ Mrs. □ Ms. □ Dr. □ Miss. □ Rev.										
Full N	ame/Organization/Age	ency		Ci	tv	State	Zi	p Code		
					ort Saint Joe	FL		2456		
В										
If an (	Organization/Agency p	rovide a Primary Contact	Name	County Daytime Phone						
				Out/State County						
Age C		44 <del>- 45 - 54 - 55 - 50 - 5</del>	⊒ 00	Er	nail Address					
🗆 18	-24 ∐ 25-34 <u>⊠</u> 35-4	14 □ 45-54 □ 55-59 □	」60+							
		May we contact you by	email? If yes,	we will not contact you by regular mail □ No ☑ Yes						
							- N - N			
		Are you or your spouse	active military	,		I LX	I No □ Ye	es .		
Section	on 2: Who is the Co	omplaint Against?								
Individ	dual/Business	· ·		Name of Individual/Representative you dealt with						
Dr. Pa	atrick Sheets				Jamie Scholl	,	•			
<u> </u>	t Address				City State			Zip Code		
	outh McKinley Ave				Rensselaer		IN 47978			
Count	·	time Phone		Email Address						
		ume r none		Littali Addiess						
Jaspe Section		ncident Details								
				2 D.	If a Transaction what was th	. Trans	action for O			
3-A:	Date of Transaction/I	incident			If a Transaction, what was the			¬	D . (1/O)	
			⊔ Му	business 🗵 My family/hous	enola L	I My farm L	_ Non-	Profit/Church		
3-C:	Where did the Transa	action/Incident occur? (ch	eck box where a	pplicab	le)					
	☐ My home	,			☐ By Internet/email					
	☐ At the location of	the business		☐ By telephone						
	☐ Away from the loc	cation of the business		☐ By Social Media						
	☐ By mail			Other     ■     Other						
3-D:	What was the year fi	ret contact hetween you o	nd the Individu	al/Rusi	nace?					
J-D.	3-D: What was the very first contact between you and the Individual/Business?									
☐ I responded to a TV/radio ad ☐ I went to the					ation in the mail	☐ I responded to a printed				
					tion of the business e call from the business	advertisement  ☑ Other, describe below				
					led to an offer on the Internet  4/17/2022					
·										
3-E:	How did you Pay?									
	☐ Cash ☐ Credit Card/Pre-pay ☐ Medic			caid □ Pay-Pal □ Wire Transfer						
☐ Check ☐ Installment Loan ☐ Medi					☐ Private Insurance	X	l Other			
				1						
3-F:	What, if anv. is the D	ollar amount associated w	vith your loss?	\$						
	,,,			-						
3-G:		Number (if applicable)		1						

CONSUMER COMPLAINT Page 2 of 2

Section 4 Actions Taken by Consumer									
☐ Yes ☒ No	4-A:	Did you sign a written agreement or contract?	If yes, please attach a co	opy of the documentation.					
☐ Yes  ☒ No	'es ☑ No 4-B: Have you hired a private attorney?								
☐ Yes ☒ No	'es ⊠ No 4-C: Have you started a court action? If yes, please attach a copy of all court papers.								
☐ Yes ☒ No	Yes 🗵 No 4-D: Have you sued, or have you been sued, over this incident/transaction? If yes, please attach a copy of all court papers.								
Section 4 Acti	ons Tal	en by Consumer - continued							
☑ Yes ☐ No 4-E: Have you complained to the Individual/Business? April 17, 2022									
	None.								
Yes□ No	es□ No 4-F: Have you filed a complaint with any other agency? If yes, list other agency:								
Section 5 Train	nsactior	n/Incident Details – attach additional pages if ne	ecessary						
		py of all documentation involved (order blank, warranty, creetc). Please print clearly or type. <b>Do Not Include your \$</b>		invoice, contract or written agreement, advertisement,					
If you answered "Ye	s" to 4-E	or 4-F above please include in the transaction/incide	lent details below when you	complained and what action was taken.					
This office has prescribed my mother several controlled substances in the past. I notified them in the past that she was addicted to meds and using alcohol, I also told them she was an alcoholic. But they continue to prescribe. She lives in Port Saint Joe, Florida. They have even prescribed medication to her without even visiting or seeing the Dr. before. Last refill of controlled substance was 12/8/2023 of 90 supply of alprazolam. I'm pretty sure she visited the office then.  She has been arrested twice and to rehab 3 times in last 18 months.									
Section 6 Hov	v would	you like your Complaint resolved?							
Stop giving		any medical attention or advice. Please help	before she kills herself of	or someone else by driving impaired.					
Section 7 WH	$\Lambda$ T $\sqcup$ $\Lambda$	PPENS NEXT?		Section 8 Mail Completed Forms to:					
		on Division will send a copy of your complai	nt to the	'					
		usiness or licensed professional. This office		Office of Attorney General Consumer Protection Division					
		icensed professional to the public unless this of		Government Center South, 5th Floor					
		the licensed professional. This office represer re remedies it can pursue. You may be entitled		302 W. Washington Street					
		hts that we cannot pursue for you. In addition t		Indianapolis, IN 46204 317-232-6330 (phone) • 317-233-4393 (fax)					
	y want t	to consider contacting a private attorney or you	r local small	www.IndianaConsumer.com					
claims court. Section 9 Cor	eent an	d Verification							
- Occion 5 Cor	ioent al								
Do you consent to disclosing the following information to the public?   ✓ Yes ☐ No The nature of the complaint and the individual/business name ✓ Yes ☐ No Your name ✓ Yes ☐ No Your phone number									
I affirm, under penalties for perjury, that the foregoing representations are true. I consent to the Consumer Protection Division obtaining or releasing any information in furtherance of the disposition of this complaint. I consent to the release of information included in this complaint to other public agencies attempting to discover ongoing fraudulent patterns or practices and for the purpose of law enforcement. I understand that I should not include my Social Security Number in any information submitted to the Consumer Protection Division. If I do provide my Social Security Number, I expressly consent to the disclosure of my Social Security Number in accordance with Indiana Code § 4-1-10-5(2).									
B	December 31, 2023								
Your signature			Date						

## State Ex. 2

INSTRUCTIONS:

To prevent delay, please be sure to complete **both sides** of this form in full. Please print clearly or type. **Do not include your Social Security Number** on this form or in any accompanying documents. **Please note:** If you have already obtained a judgment, or there is pending litigation, we may be limited or unable to take further action on your complaint.

Case No: 11748563

Section	on 1: Your Informa	tion								
Salutation					Street Address					
☐ Det. ☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr. ☐ Miss. ☐ Rev.										
Full N	lame/Organization/Age	encv		City State			7	Zip Code		
		,			ensselaer	IN		17978		
J	M									
If an (	Organization/Agency p	provide a Primary Contact	Name	County Daytime Phone						
A	<b>.</b>			Jasper						
Age Group         □ 18-24       □ 25-34       □ 35-44       □ 45-54       □ 55-59       □ 60+					Email Address					
		May we contact you by	email? If yes,	we will not contact you by regular mail □ No ☑ Yes						
		Are you or your spouse	active military?	)			No □ Ye	es		
Section	on 2: Who is the C	omplaint Against?								
	dual/Business			Name of Individual/Representative you dealt with						
Dr. Pa	atrick sheets				Dr. Sheets					
Street	t Address				City St		ate Zip Code			
123 s	mckinley				Rensselaer IN			47978		
Coun	ty Day	time Phone		Email Address						
	(									
Section	on 3: Transaction/I	ncident Details								
3-A: Date of Transaction/Incident				3-B:	If a Transaction, what was the	ne Transa	action for?			
	2020-2024			☐ My business ☒ My family/household ☐ My farm ☐ Non-Profit/Church						
3-C:	Where did the Trans	action/Incident occur? (ch	eck box where a	pplicab	le)					
☐ My home					☐ By Internet/email					
	★ At the location of			<ul><li>□ By telephone</li><li>□ By Social Media</li></ul>						
	☐ Away from the loc	cation of the business		☐ By Social Media						
	·									
3-D:	3-D: What was the very first contact between you and the Individual/Business?									
· ·					information in the mail					
				the location of the business advertisement d a phone call from the business						
	☐ A person came to my home ☐ I received a phone call from the business ☐ Other, describe below ☐ I received information by email ☐ I responded to an offer on the Internet									
2.5	H									
3-E: How did you Pay?							_			
	☐ Cash ☐ Credit Card/Pre-pay ☐ Medic				•					
	☐ Check	☐ Installment Loan	⊠ Medic	aie	☐ Private Insurance	Ц	Other			
3-F: What, if any, is the Dollar amount associated with your loss?					5000					
3-G: Vehicle Identification Number (if applicable)										
ا ت ت		(ii applicable)		1						

CONSUMER COMPLAINT Page 2 of 2

Section 4 Acti	ons Taken by Consumer							
☐ Yes  ☒ No	·							
☐ Yes ☒ No	4 B. Have you timed a private attention.							
☐ Yes ☒ No	4-0. Have you started a court action: if yes, please attach a copy of all court papers.							
☐ Yes  ☒ No	☐ Yes 区 No 4-D: Have you sued, or have you been sued, over this incident/transaction? If yes, please attach a copy of all court papers.							
	ons Taken by Consumer - continued							
⊠ Yes □ No	☑ Yes □ No 4-E: Have you complained to the Individual/Business? Numerous times  Nothing							
Yes□ No	es□ No 4-F: Have you filed a complaint with any other agency? If yes, list other agency: Dea March 2024 Not sure							
Section 5 Trai	nsaction/Incident Details – attach additional pages if nec	essarv						
		t card receipt and statement, invoice, contract or written agreement, advertisement,						
	spondence etc). Please print clearly or type. Do Not Include your So							
If you answered "Ye	es" to 4-E or 4-F above please include in the transaction/incide	nt details below when you complained and what action was taken.						
Dr sheets was my family physician. Over time he became more of a friend than a doctor. He tried to foce me to do illegal things for him to keep receiving my medications. He prescribed me contolled substances and then made me give him some of the pills for himself. I had a heart attack and he forced me to live with him to take care of his elderly father. One of his nurses asked me out and had me move in with her only to kick me out 3 weeks later 7 days after my heart attack. I believe they did this together to take all of my stuff and try to harm me because of information that i know about his illegal activities. I don't care about my possessions to be honest. I just don't want to see anyone else have to go through this and believe he's going to harm a patient very bad one day.								
Section 6 How would you like your Complaint resolved?  Investigate								
Section 7 WH	AT HAPPENS NEXT?	Section 8 Mail Completed Forms to:						
respondent indiv your complaint aga disciplinary action Indiana and is limit compensation or o	The Consumer Protection Division will send a copy of your complaint to the respondent individual/business or licensed professional. This office cannot disclose your complaint against a licensed professional to the public unless this office files a disciplinary action against the licensed professional. This office represents the State of Indiana and is limited in the remedies it can pursue. You may be entitled to compensation or other rights that we cannot pursue for you. In addition to filing this complaint, you may want to consider contacting a private attorney or your local small  Office of Attorney General Consumer Protection Division Government Center South, 5th Floor 302 W. Washington Street Indianapolis, IN 46204  317-232-6330 (phone) • 317-233-4393 (fax www.IndianaConsumer.com							
	sent and Verification							
Do you consent to disclosing the following information to the public?   ✓ Yes ☐ No The nature of the complaint and the individual/business name ✓ Yes ☐ No Your name ✓ Yes ☐ No Your phone number								
I affirm, under penalties for perjury, that the foregoing representations are true. I consent to the Consumer Protection Division obtaining or releasing any information in furtherance of the disposition of this complaint. I consent to the release of information included in this complaint to other public agencies attempting to discover ongoing fraudulent patterns or practices and for the purpose of law enforcement. I understand that I should not include my Social Security Number in any information submitted to the Consumer Protection Division. If I do provide my Social Security Number, I expressly consent to the disclosure of my Social Security Number in accordance with Indiana Code § 4-1-10-5(2).								
J	March 21, 2024							
Your signature Date								

#### State Ex. 3

INSTRUCTIONS:

To prevent delay, please be sure to complete both sides of this form in full. Please print clearly or type. Do not include your Social Security Number on this form or in any accompanying documents. Please note: If you have already obtained a judgment, or there is pending litigation, we may be limited or unable to take further action on your complaint.

Case No: 11759741 Section 1: Your Information Salutation □ Det. Mr. □ Mrs. □ Ms. □ Dr. □ Miss. □ Rev. Full Name/Organization/Agency State Zip Code 47960 If an Organization/Agency provide a Primary Contact Name County Daytime Phone Age Group Email Address □18-24 □25-34 □35-44 □45-54 □55-59 ☑ 60+ May we contact you by email? If yes, we will not contact you by regular mail Yes LI No Are you or your spouse active military? ☐ Yes X No Section 2: Who is the Complaint Against? Individual/Business Name of Individual/Representative you dealt with Street Address State Zip Code Lon County Section 3 Transaction/Incident Details ablackel Date of Transaction/Incident If a Transaction, what was the Transaction for? ☐ My business 
☐ My family Househeld ☐ My farm ☐ Non-Profit/Church Where tild the Transaction/Incident occur? (check box where applicable) S By Internet/email / N/C france ☐ My home At the location of the business By telephone Away from the location of the business □ By social media BLBy mail ☐ Other 3-D: What was the very first contact between you and the Individual/Business? ☐ I telephoned the individual/business L received information in the mail ☐ I responded to a printed advertisement ☐ I responded to a TV/radio ad I went to the location of the business Other, describe below A person came to my home ☐ I received a phone call from the business □ I received information by email □ I responded to an offer on the Internet. 3-E: How did you Pay? ☐ Cash ☐ Wire transfer ☐ Credit card/pre-pay ☐ Medicaid Pay-Pal ☐ Check ☐ Installment Loan ☐ Other ☐ Medicare Private Insurance 3-F: What, if any, is the Dollar amount associated with your loss? \$

Section 4 Ac	tions Tak	ken by Consum	ier		- 22		
☐ Yes ☑ No 4-A: Did you sign a written agreement or contract? If yes, please attach a copy of the documentation.							
☐ Yes ONO	WNo 4-B: Have you hired a private attorney?						
☐ Yes ∰ No							
☐ Yes 🄁 No 4-D: Have you sued, or have you been sued, over this incident/transaction? If yes, please attach a copy of all court papers.							
Section 4 Actions Taken by Consumer - continued							
SYes □ No 4-E: Have you complained to the Individual/Business?							
						11 1	
Yes 🗆 No	4-F:	Have you filed	d a complaint with	any other age	ncy? If yes, list o	ther agency: Admy Insurace	
	ju	1 healt	heare pro	vidor			
Section 5 Tr	ansaction	n/incident Deta	ils – atfach additic	inal pages if ne	cessary		
			ation involved (order to t clearly or type. Do to			statement, invoice, contract or written agreement, advertisement, aber.	
						when you complained and what action was taken.	
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Medical	r is	54PPuse	My Johns	into th	is practic		
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	-	-	Complaint resolve		المستعدات		
24	that !	you know	the our	wer			
- NO NO.	NAME OF TAXABLE PARTY.	PPENS NEXT?				Section 8 Mail Completed Forms to:	
			Il send a copy of			Office of Attorney General	
			ensed profession sional to the publi			Consumer Protection Division	
disciplinary action	n against	the licensed p	rofessional. This	office represen	ts the State of	Government Center South, 5th Floor 302 W. Washington Street	
			can pursue. You a nnot pursue for yo			Indianapolis, IN 46204	
			ntacting a private			317-232-6330 (phone) • 317-233-4393 (fax)	
claims court.			9-1	, , , , , , , , , , , , , , , , , , , ,		www.IndianaConsumer.com	
Section 9 Co	onsent ar	nd Verification					
_			XYes No	The nature of	the complaint a	nd the individual/business name	
Do you consent to disclosing the following information to the public? Yes No Your name							
10.00	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	o ano paono.	☐ Yes Mo	Your phone n	umber		
						ent to the Consumer Protection Division obtaining or	
releasing any information in furtherance of the disposition of this complaint. I consent to the release of information included in this complaint to other public agencies attempting to discover ongoing fraudulent patterns or practices and for the purpose of law enforcement. I understand							
that I should n	ot includ	e my Social Se	ecurity Number in	any informatio	n submitted to t	he Consumer Protection Division. If I do provide my	
Social Security Mumber Dexpressly consent to the disclosure of my Social Security Number in accordance with Indiana Code § 4-1-10-5(2).							
					7-11	2024	
					Date		