

**STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH
BUREAU OF HEALTHCARE SYSTEMS**

In re: Valery Covello, L.P.N.

Petition No. 2003-0213-011-008

STATEMENT OF CHARGES

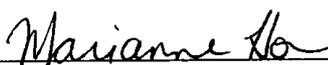
Pursuant to the General Statutes of Connecticut, §§19a-10 and 19a-14, the Department of Public Health (hereinafter "the Department") brings the following charges against Valery Covello:

1. Valery Covello of Stamford, CT (hereinafter "respondent") is, and has been at all times referenced in this Statement of Charges, the holder of Connecticut licensed practical nurse license number 017122.
2. At all relevant times, respondent was employed as a licensed practical nurse at Maxim Healthcare Services, Inc. of Hamden, Connecticut (hereinafter "Maxim").
3. On or about June 11, 2002 to June 12, 2002, while working as a licensed practical nurse with Maxim, respondent was assigned to provide homecare for an infant in Wilton, CT. On or about June 12, 2002, while providing homecare for said infant, respondent:
 - a. fell asleep and/or was not alert and/or was unable to respond to an alarm that was ringing as a result of the infant's oxygen apparatus becoming disconnected;
 - b. failed to administer feedings via NG tube, every three hours as ordered; and/or
 - c. failed to completely, properly and/or accurately document medical records.
4. The above facts constitute grounds for disciplinary action pursuant to the General Statutes of Connecticut, §20-99(b), including but not limited to §20-99(b)(2).

THEREFORE, the Department prays that:

1. The Connecticut Board of Examiners for Nursing, as authorized by the General Statutes of Connecticut, §§20-99(b) and 19a-17, revoke or order other disciplinary action against the license of Valery Covello as it deems appropriate and consistent with law.

Dated at Hartford, Connecticut this 9th day of June, 2004.



Marianne Horn, Director
Division of Health Systems Regulation
Bureau of Healthcare Systems