

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

In re: Michele Wheeler, L.P.N.

Petition No. 2007-0104-011-001

**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 Michele Wheeler:

**COUNT ONE**

1. Michele Wheeler of Trumbull (hereinafter "respondent") is, and has been at all times referenced in this Statement of Charges, the holder of Connecticut licensed practical nursing license number 019446.
2. At all relevant times, respondent was employed as a registered nurse at Bridgeport Hospital in Bridgeport, Connecticut.
3. From about August 2006 through about October 2006, while working as a registered nurse at Bridgeport Hospital, respondent abused or utilized to excess Vicodin and/or Percocet.
4. Respondent's abuse of Vicodin and/or Percocet does, and/or may, affect her practice as a licensed practical nurse.
5. 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)(5).

**COUNT TWO**

6. Paragraphs 1-2, inclusive, are incorporated herein by reference as if set forth in full.
7. From about October 2006 through about November 2006, while working as a registered nurse at Bridgeport Hospital, respondent:
  - a. diverted morphine injectables;
  - b. failed to completely, properly and/or accurately document medical or hospital records; and/or,
  - c. falsified one or more Controlled Substance Receipt Records.

8. Respondent's abuse of morphine injectables does, and/or may, affect her practice as a licensed practical nurse.
9. The above facts constitute grounds for disciplinary action pursuant to the General Statutes of Connecticut, §20-99(b), including but not limited to:
  - a. §20-99(b)(2); and/or
  - b. §20-99(b)(5).

THEREFORE, the Department prays that:

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 Michele Wheeler as it deems appropriate and consistent with law.

Dated at Hartford, Connecticut this 15<sup>th</sup> day of February 2007.

  
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Jennifer Filippone, Section Chief  
Practitioner Licensing and Investigations  
Healthcare Systems Branch

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