

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

In re: Sarah Thoms, LPN

Petition No. 2007-1217-011-043

STATEMENT OF CHARGES

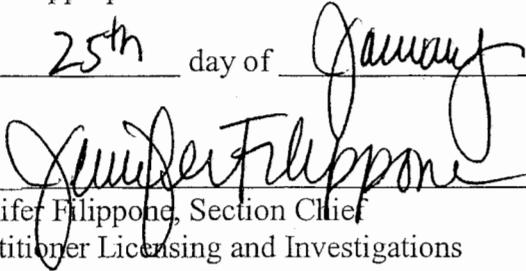
Pursuant to the General Statutes of Connecticut, §§19a-10 and 19a-14, the Department of Public Health (hereinafter "the Department") brings the following charges against Sarah Thoms:

1. Sarah Thoms of Tolland, Connecticut (hereinafter "respondent") is, and has been at all times referenced in this Statement of Charges, the holder of Connecticut practical nurse license number 023640.
2. At all relevant times, respondent was employed as a nurse at Portland Care and Rehabilitation Center in Portland, Connecticut.
3. From at least February 2007 through November 13, 2007, while working as a nurse at Portland Care and Rehabilitation Center, respondent:
 - a. diverted hydrocodone, a Schedule III narcotic controlled substance, and/or oxycodone, a Schedule II narcotic controlled substance;
 - b. failed to completely, properly and/or accurately document medical or hospital records; and/or,
 - c. falsified one or more Controlled Substance Receipt Records.
4. From approximately February 2007 through November 13, 2007, respondent abused or utilized to excess hydrocodone and/or oxycodone.
5. Respondent's abuse of hydrocodone and/or oxycodone does, and/or may, affect her practice as a nurse.
6. 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);
 - b. §20-99(b)(5); and/or,
 - c. §20-99(b)(7).

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 Sarah Thoms as it deems appropriate and consistent with law.

Dated at Hartford, Connecticut this 25th day of January 2008.



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