

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

In Re: Kristina Vanderoef, R.N.

Petition No. 2007-0529-011-021

**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 Kristina Vanderoef:

**COUNT ONE**

1. Kristina Vanderoef of Willimantic, 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 026576.
2. On March 1, 2005, respondent's license was subject to a Consent Order in Petition Number 2004-0908-011-019 (hereinafter "the Consent Order") that placed respondent's registered nurse license on probation for a period of four years. Such disciplinary action was based upon respondent's admitted diversion of controlled substances, and falsification of controlled substance records.
3. Said Consent Order specifically provided that:
  - a. Respondent engage in therapy and counseling and provide written reports from her therapist, monthly for the first and fourth year, and quarterly for the second and third years or probation; and/or,
  - b. Respondent's urine screens be negative for the presence of drugs.
4. During 2005, 2006 and/or 2007, respondent failed to engage in therapy and counseling and/or provide timely, written report(s) from her therapist, which violated the Consent Order.
5. During 2006 and/or 2007, respondent's urine screen(s) tested positive for tramadol, which violated the Consent Order.
6. During 2007, respondent falsely authorized drug prescription(s) for herself.
7. Respondent's abuse of drugs does, and/or may, affect her practice as a licensed practical nurse.
8. 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).

COUNT TWO

9. Paragraphs 1 and 7 are incorporated herein by reference as if set forth in full.
10. At all relevant times, respondent was employed as a licensed practical nurse at Kids Station, a pediatric office practice, in Willimantic, Connecticut.
11. During 2007, while working as a licensed practical nurse at Kids Station, respondent falsely authorized prescriptions for tramadol for herself.
12. During 2006 and/or 2007, respondent abused or utilized to excess tramadol.
13. 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)(6).

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 Kristina Vanderoef as it deems appropriate and consistent with law.

Dated at Hartford, Connecticut this 25<sup>th</sup> day of June 2007.

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

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