

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

In re: Donna Lee De Los Santos, L.P.N.

Petition No. 2005-0404-011-008

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 Donna Lee De Los Santos:

1. Donna Lee De Los Santos of Mystic (hereinafter "respondent") is, and has been at all times referenced in this Statement of Charges, the holder of Connecticut licensed practical nursing license number 026781.
2. At all relevant times, respondent was employed as a licensed practical nurse at Lawrence and Memorial Hospital, New London, Connecticut (hereinafter "the facility").
3. From about November 2004 through about March 2005, while working as a licensed practical nurse at the facility, respondent:
 - a. diverted Ritalin;
 - 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 about November 2004 through about March 2005, respondent abused or utilized to excess Ritalin, morphine, codeine and/or 6-acetylmorphine.
5. Respondent's abuse of Ritalin, morphine, codeine and/or 6-acetylmorphine does, and/or may, affect her practice as a licensed practical 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); 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 Donna Lee De Los Santos as it deems appropriate and consistent with law.

Dated at Hartford, Connecticut this 19th day of May, 2005.

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

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