

**STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH
HEALTHCARE QUALITY AND SAFETY BRANCH**

In re: Jane Smith, L.P.N.

Petition No. 2013-561

STATEMENT OF CHARGES

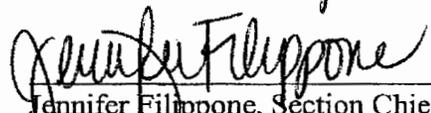
Pursuant to the General Statutes of Connecticut, §§19a-10 and 19a-14, the Department of Public Health (hereinafter "the Department") brings the following charges against Jane Smith, L.P.N.:

1. Jane Smith of Moodus, Connecticut (hereinafter "respondent") was, at all times referenced in this Statement of Charges, the holder of Connecticut licensed practical nursing license number 028702.
2. On one or more occasion during the course of approximately January 2013 through May 2013, while working as a licensed practical nurse at Salmon Brook Center, Glastonbury, Connecticut, respondent:
 - a. diverted the controlled substance oxycodone; and/or
 - b. inappropriately removed the proof-of-use sheet(s) and/or blister card(s) for the controlled substance oxycodone for one or more patients in order to obtain oxycodone for respondent's personal use.
3. During 2013, respondent abused and/or utilized to excess oxycodone.
4. Respondent's abuse and/or excessive use of oxycodone 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:
 - a. §20-99(b)(2); and/or,
 - b. §20-99(b)(5).

THEREFORE, the Department prays that:

The Connecticut State 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 nursing license of Jane Smith as it deems appropriate and consistent with law.

Dated at Hartford, Connecticut this 15th day of July 2013.



Jennifer Filippone, Section Chief
Practitioner Licensing and Investigations
Healthcare Quality and Safety Branch