

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

In re: Deborah Ellegard, LPN

Petition No. 2007-0424-011-018

**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 Deborah Ellegard:

COUNT ONE

1. Deborah Ellegard of Rocky Hill, 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 028829.
2. On or about April 3, 2007, respondent abused or utilized to excess cocaine.
3. Respondent's abuse of cocaine does, and/or may, affect her practice as a license practical nurse.
4. The above facts constitute grounds for disciplinary action pursuant to the General Statutes of Connecticut, §20-99, including but not limited to §§20-99(b)(2) and/or 20-99(b)(5).

COUNT TWO

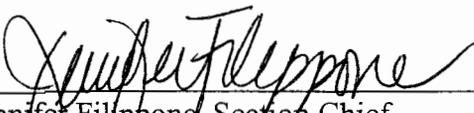
5. Paragraph 1 is incorporated herein by reference as if set forth in full.
6. On or about November 2, 2005, the Connecticut Board of Examiners for Nursing (hereinafter "the Board") ordered a Consent Order in Petition Number 2004-1112-011-022 (hereinafter "the Consent Order") that placed respondent's licensed practical nurse license on probation for a period of four (4) years. Such disciplinary action was based upon proof of respondent's diversions of Percocet.

7. Said Consent Order specifically provided, among other things, that all of respondent's urine screens be negative for the presence of drugs. The Consent Order also provided that respondent shall not obtain or use controlled substances in any form unless prescribed or recommended for a legitimate therapeutic purpose by a licensed health care professional authorized to prescribe medications.
8. On or about April 3, 2007, respondent tested positive for cocaine.
9. On or about April 24, 2007, respondent advised the Department that on or around April 3, 2007 she ingested cocaine.
10. Respondent's conduct as described above constitutes violations of the terms of probation as set forth in the Consent Order, and subjects respondent's license to revocation or other disciplinary action authorized by the General Statutes of Connecticut, §§19a-17 and 20-99(b).

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 Deborah Ellegard as it deems appropriate and consistent with law.

Dated at Hartford, Connecticut this 10<sup>th</sup> day of May  
2007.

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