

**STATE OF CONNECTICUT  
DEPARTMENT OF PUBLIC HEALTH  
BUREAU OF REGULATORY SERVICES**

In re: Timothy Driscoll, Embalmer

Petition No. 2005-1209-030-018

**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 Timothy Driscoll:

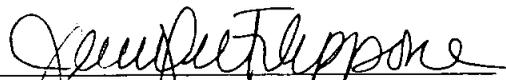
1. Timothy Driscoll of Torrington, CT (hereinafter "respondent") is, and has been at all times referenced in this Statement of Charges, the holder of Connecticut embalmer license number 001920.
2. At all times referenced herein, respondent has been the owner and manager of Driscoll Mortuary, Inc., a funeral service business holding an inspection certificate for the premises located at 135 Migeon Ave., Torrington, CT.
3. Until October 1, 2005, Driscoll Mortuary, Inc., was located at 135 Migeon Ave. Torrington, CT.
4. On or about October 1, 2005, Driscoll Mortuary Inc. vacated its location at 135 Migeon Ave., Torrington, CT.
5. Respondent failed to provide the Department with thirty-day advance notice to change the premises of Driscoll Mortuary, Inc., in violation of Connecticut General Statute Section 20-222(c).
6. Subsequently, respondent applied for an inspection certificate for new premises at 285 Migeon Ave., Torrington, CT for Driscoll Mortuary, Inc.
7. Licensure inspections have been performed by the Department of Public Health at the 285 Migeon Ave., Torrington, CT address. Driscoll Mortuary, Inc. has not been issued a new inspection certificate at the new address.
8. Driscoll Mortuary, Inc. is no longer an established funeral service business under Chapter 385 of the Connecticut General Statutes.
9. Since approximately October 1, 2005, respondent has not been an owner, employee or member of any other established funeral service business.

10. On multiple occasions since October 1, 2005, respondent has engaged in the business of funeral directing and/or embalming in Connecticut on behalf of the Driscoll Mortuary, Inc., in violation of Connecticut General Statute Section 20-220.
11. As of January 25, 2006, funeral home records of respondent and/or Driscoll Mortuary, Inc. were being maintained at respondent's residence.
12. As of January 25, 2006, the at-need and/or pre-need records of respondent and/or Driscoll Mortuary, Inc. were being maintained at respondent's residence.
13. Statements of goods and services for funeral arrangements, which identify the costs of services and merchandise, are available at the 285 Migeon Ave., Torrington premises, pre-signed by respondent, for new customers.
14. The above-described facts constitute grounds for disciplinary action pursuant to the General Statutes of Connecticut, §20-227, including but not limited to:
  - a. §20-227(2);
  - b. §20-227(4); and/or,
  - c. §20-227(5)

THEREFORE, the Department prays that:

The Connecticut Board of Examiners of Embalmers and Funeral Directors, as authorized in §§19a-17 and 20-227, order disciplinary action against the embalmer license of Timothy Driscoll as it deems appropriate and consistent with law.

Dated at Hartford, Connecticut this 6<sup>th</sup> day of March, 2006.

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