

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

In re: Susan Williams, L.A.D.C.

Petition No. 2005-0707-044-001

STATEMENT OF CHARGES

Pursuant to the General Statutes of Connecticut, §19a-14, the Department of Public Health (hereinafter "the Department") brings the following charges against Susan Williams:

COUNT ONE

1. Susan Williams of Blairstown, New Jersey (hereinafter "respondent") is, and has been at all times referenced in this Statement of Charges, the holder of Connecticut licensed alcohol and drug counselor license number 000336.
2. In or about June 2005, respondent abused or utilized to excess morphine and/or alcohol.
3. Respondent's abuse of morphine and/or alcohol does, and/or may, affect her practice as a licensed alcohol and drug counselor.
4. The above facts constitute grounds for disciplinary action pursuant to the General Statutes of Connecticut, §20-74s(r).

COUNT TWO

5. Paragraphs 1-2 are incorporated herein by reference as if set forth in full.
6. On March 10, 2004 a Consent Order was signed in Petition Number 2002-0328-044-002 that placed respondent's licensed alcohol and drug counselor license on probation for a period of four years. Such disciplinary action was based on respondent's admitted diversions of Methadone and/or Librium.
7. Said Consent Order specifically provided that all alcohol and drug screens shall be negative for alcohol, controlled substances, and legend drugs.
8. On about June 9, 2005 respondent's urine screen result was positive for morphine.

9. On about June 30, 2005 respondent's urine screen result was positive for alcohol.

Respondent's conduct as described above constitutes violations of the terms of probation as set forth in the Decision, and subjects respondent's license to revocation or other disciplinary action authorized by the General Statutes of Connecticut, §§19a-14 and 20-74s(r).

THEREFORE, the Department prays that:

The Hearing Officer, as authorized by the General Statutes of Connecticut, §§20-74s(r) and 19a-14, revoke or order other disciplinary action against the license of Susan Williams as it deems appropriate and consistent with law.

Dated at Hartford, Connecticut this 12th day of August 2005.



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

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DEPARTMENT OF PUBLIC HEALTH
HEALTHCARE SYSTEMS BRANCH

In re: Susan Williams, L.A.D.C.

Petition No. 2005-0707-044-001

SUMMARY SUSPENSION ORDER

WHEREAS, the affidavits, duly verified, allege facts which show violations of §20-74s(r) of the Connecticut General Statutes, as amended, and which imperatively require emergency action in that the public health, safety or welfare of the citizens of the State of Connecticut is in clear and immediate danger; and,

Pursuant to the authority of §4-182(c) and §19a-14, pending the hearing set for the 29th & 30th day of SEPTEMBER 2005, at 9:30 a.m.

It is hereby ORDERED, by a Hearing Officer designated by the Commissioner of the Department of Public Health (hereinafter "the Hearing Officer") that license number 000336 of Susan Williams to practice as a licensed alcohol and drug counselor in the State of Connecticut is summarily suspended pending a final determination by the Hearing Officer regarding the allegations contained in the Statement of Charges.

Further it is hereby ordered by the Hearing Officer that Susan Williams immediately surrender her license number 000336 to the Department of Public Health, 410 Capitol Avenue, MS #13PHO, P.O. Box 340308, Hartford, Connecticut, 06134-0308 upon notification of this Order.

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



Hearing Officer

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STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH
HEALTHCARE SYSTEMS BRANCH

In re: Susan Williams, L.A.D.C.

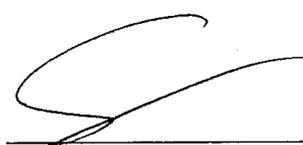
Petition No. 2005-0707-044-001

MOTION TO WITHDRAW STATEMENT OF CHARGES

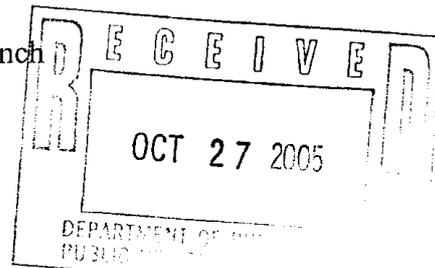
Comes now the Department of Public Health (hereinafter "the Department") and hereby moves the Hearing Officer for an Order granting this Motion to Withdraw. As grounds for this Motion, the Department states that on October 19, 2005, respondent signed a Voluntary Surrender. A copy of respondent's Voluntary Surrender is attached hereto marked as Attachment "A." The Department has accepted respondent's Voluntary Surrender and license.

Respondent has voluntarily given up her right to practice as a licensed alcohol and drug counselor in Connecticut with the Department's approval. For this reason, the Department believes that continued prosecution of this case is unnecessary, and that it is in the interests of justice and administrative economy to terminate these proceedings at this time.

Dated this 27th day of October, 2005 at Hartford, Connecticut.



Stanley K. Peck, Section Chief
Legal Office
Healthcare Systems Branch

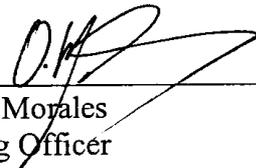


ORDER

The foregoing motion having been duly considered by the Hearing Officer, it is hereby

GRANTED/~~DENIED~~.

Dated this 27th day of October, 2005 at Hartford, Connecticut.



Olinda Moyales
Hearing Officer

Attachment A

STATE OF CONNECTICUT DEPARTMENT OF PUBLIC HEALTH HEALTHCARE SYSTEMS BRANCH

Re: Susan Williams, L.A.D.C.
License No.: 000336

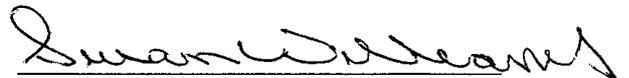
Petition No. 2005-070-044-001

VOLUNTARY SURRENDER

Susan Williams, being duly sworn, deposes and says:

1. I am over the age of majority and understand the obligations of an oath.
2. I make this affidavit on the basis of personal knowledge.
3. I am licensed by the Department of Public Health (hereinafter "the Department") to practice as a licensed alcohol and drug counselor. I presently hold license number 000336.
4. I hereby voluntarily surrender my license to practice as a licensed alcohol and drug counselor in the State of Connecticut.
5. I will not seek a new license or seek to reinstate my license at any time in the future.
6. I understand and agree that if I seek a new license or to reinstate my license at any time in the future, the allegations contained in Petition Number 2005-0707-044-001 shall be deemed true. I further understand that any such application must be made to the Department, and that the Department shall be a signatory to any order reinstating my license or granting me a new license.
7. I hereby waive any right to a hearing I may have regarding any request that my license be reinstated or that a new license be issued and also waive any right that I may have to appeal or otherwise challenge the disposition of any such request.
8. I understand and agree that this affidavit and the case file in Petition Number 2005-0707-044-001 are public documents, and I am executing this affidavit in settlement of the allegations contained in the above-referenced petition.
9. I understand that this surrender of my license is a reportable event and is public information.

10. I understand that, upon execution of this document by the Department, the Department will present this document to the Hearing Officer and will move to withdraw the Statement of Charges in Petition No. 2005-0707-044-001. I understand that this document is not effective unless and until the Department has executed it, and the Hearing Officer either grants the Department's Motion to Withdraw or the charges are dismissed.
12. I understand that I have the right to consult with an attorney prior to signing this affidavit.
13. I understand that the execution of this document has no bearing on any criminal liability without the written consent of the Director of the Medicaid Fraud Control Unit or the Bureau Chief of the Division of Criminal Justice's Statewide Prosecution Bureau.


Susan Williams

Subscribed and sworn to before me this 19th day of October 2005.

BEATRICE LOMBARDO
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES NOV. 23, 2008


Notary Public
Commissioner of Superior Court

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

10-27-05
Date