

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

In Re: Coventry Funeral Home

Petition No. 2006-1206-056-012

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 Coventry Funeral Home:

1. Coventry Funeral Home of Coventry, CT (hereinafter "respondent") is, and has been at all times referenced in this Statement of Charges, the holder of Connecticut funeral home inspection certificate 483.
2. At all times referenced herein, Kevin Riley, embalmer license number 2251, has been the owner and/or manager of both Coventry Funeral Home, and an allied entity, Hartford Trade Service. Hartford Trade Service holds funeral home inspection certificate 467.
3. On or about April 28, 2006, J. C. died in West Hartford, Connecticut.
4. On or about April 28, 2006, agents of Hartford Trade performed a removal of decedent from his home in West Hartford pursuant to its contract with Connecticut Office of Chief Medical Examiner (hereinafter "OCME").
5. On or about May 25, 2006 an agent for Hartford Trade applied to the West Hartford Probate Court (hereinafter "Probate Court") for custody and control of decedent's remains. Probate Court awarded said agent custody and control on June 1, 2006.
6. On or about June 1, 2006, Kevin Riley submitted an application to Probate Court to become the temporary administrator of decedent's C's estate.
7. On or about June 13, 2006, J. C. B., first cousin of decedent J. C., contacted Coventry Funeral in her capacity of next of kin. No employee at Coventry Funeral offered to discuss the funeral arrangements of decedent with Ms. B.
8. On or about June 15, 2006, Ms. B. attended the funeral Mass for decedent.
9. On or about June 16, 2006, Ms. B. attended the graveside service for decedent.
10. On or about June 16, 2006, Ms. B. contacted Probate Court, making it aware of her relationship to decedent.

11. On or about June 16, 2006, Ms. B. requested that respondent and/or its agent provide her with a price list of goods and services available and a final statement of goods and services selected.
12. During August 2006, Ms. B. received a copy of a general price list.
13. On or about June 27, 2006, respondent and/or its agent submitted an itemized statement of goods and services selected to West Hartford Probate Court, requesting authorization to make payment for the funeral arrangements of decedent J. C.
14. Respondent's agent(s) failed to provide a written statement of prices of goods and services selected, cash advance items and payment requirements to West Hartford Probate Court prior to rendering goods and services, in violation of Connecticut General Statutes Section 20-230b.
15. The West Hartford Probate Court had not authorized respondent to provide and/or charge for funeral goods and services prior to the rendering of such goods and services.
16. The Coventry Funeral's itemized statement of goods and services selected for decedent's funeral included items not on the general price list of Hartford Trade, whose agent had been an awarded custody and control of decedent's remains.
17. Coventry Funeral improperly charged for refrigerated storage of decedent's remains when the decedent was in the custody of the OCME, and physically housed with Hartford Trade and/or Coventry Funeral.
18. Coventry Funeral's itemized statement of goods and services selected for such decedent improperly lists separate charges for services that were included in the non-declinable charge for the Basic Services of Funeral Director and Staff.
19. Coventry Funeral's itemized statement of goods and services selected for decedent J. C.'s funeral arrangements includes items not on the general price list, including but not limited to:
 - a. dumpster fee;
 - b. probate fee;
 - c. refrigeration;
 - d. office work, life ins.;
 - e. research, probate hearing;
 - f. use of hearse;
 - g. use of limousine;
 - h. use of sedan; and/or,
 - i. use of service/utility vehicle.
20. 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, revoke or order other disciplinary action against the funeral home inspection certificate of Coventry Funeral Home as it deems appropriate and consistent with law.

Dated at Hartford, Connecticut this 9th day of January 2007.



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

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