

**VERMONT SECRETARY OF STATE  
OFFICE OF PROFESSIONAL REGULATION  
BOARD OF NURSING**

*In re:* Denise M. Snyder }  
License No. 026-0018399 }  
Docket No. NU 13-0905 }

**FINDINGS OF FACT  
CONCLUSIONS OF LAW & ORDER**

Introduction:

On Monday 13 February 2006 the Board heard this contested case of alleged unprofessional conduct brought by the State of Vermont against Respondent Denise Snyder. Board members Kenneth W. Bush, Susan O. Farrell, Chairperson, Donarae Metcalf, Laurey Tyo, DeAnn Welch and Alan Weiss participated in the hearing of this matter. Board members Ellen Leff and Linda M. Y. Rice recused themselves. The Respondent appeared with counsel Steven B. Wright. Edward G. Adrian represented the State of Vermont. Board counsel Kevin F. Leahy presided.

The State brought a specification of charges (the "Charges") dated 28 November 2005 against the Respondent alleging unprofessional conduct for practicing while physically unfit to do so and suspicion of substance abuse. The Respondent worked at Southern Vermont Correctional Facility in Springfield, Vermont (the "Facility") at the time of the one incident in question. She was working at another hospital at the time the State began its investigation into this matter.

Appearing as witnesses before the Board were the Respondent as well as John Leppman, M.D. and David A. Lord, Ph.D, both by phone.

The Board accepted into evidence:

State's Exhibit 1. Evaluation report by David Lord, Ph.D., ABPP  
Resp'd Exhibit A. Affidavit of Douglas Haralson dated 11 November 2005.  
Resp'd Exhibit B. Letter from John Leppman, M.D. dated 25 July 2005.

The Board also reviewed a joint stipulation of fact and understanding (the "joint stipulation") submitted by the two parties. In the joint stipulation, the parties agreed to all of the background factual allegations set forth in the State's specification of charges, and they also stipulated to the operative allegation of unprofessional conduct as modified. Specifically, both parties stipulated that:

on 15 July 2005, the "Respondent was sent home [from the facility] because her speech was slurred, she appeared dizzy and disorganized and her supervisor felt that [she] was unable to carry out her duties."

Joint stipulation at ¶ 7.

Based on this allegation, the State brought individual charges of unprofessional conduct against the Respondent. Based on the admission of her condition at her employment on 15 July 2005, the Respondent also acknowledged in the joint stipulation that the Board has "the authority to discipline [the Respondent's] license to practice nursing." In addition to the joint stipulation, the parties presented evidence in order to give fuller context and background to the stipulated facts. The parties also argued why the evidence justified their respective positions on the most appropriate sanction.

Consistent with the parties' stipulations of fact and their mutual concurrence on the legal authority of the Board; and after hearing the evidence in this case, the Board accepts the facts as stipulated and finds the Respondent has engaged in unprofessional conduct. The Board also makes the following findings.

Findings of Fact &  
Conclusions of Law:

1. Respondent holds a State of Vermont nursing license, which was suspended in October 2005.
2. This Board licenses the Respondent and may exercise disciplinary authority for alleged acts of licensee unprofessional conduct. 26 V.S.A. Chapter 28; 3 V.S.A. § 129(a); Bd. Nursing Admin. Rules and Office Prof. Reg. Admin. Rules.
3. The Respondent admits the factual allegations set forth in the Charges as amended by joint stipulation.
4. In a disciplinary hearing, the state has the burden of proof. To satisfy its evidentiary burden, it must "show by a preponderance of the evidence that [a licensee] has engaged in unprofessional conduct." 3 V.S.A. § 129a(c).
5. In October 2003, the Respondent received a summary suspension on her license due to questions about a disciplinary matter arising out of her workplace. At the time of the summary suspension, the State presented evidence from which the Board could infer that Respondent may have diverted substances from her employer.
6. After a more thorough investigation by the State, the Board received no evidence that Respondent had either used narcotics illegally or diverted them, which was an issue related to the summary suspension.
7. At this merits hearing, the Board holds as an initial matter that the State has met its burden of proof. The Respondent, in the joint stipulation, recognizes the Board's authority to discipline her license in light of her admissions.

8. The issue before the Board is disposition in light of the unprofessional conduct occurring on 15 July 2005, not whether unprofessional occurred on 15 July 2005. The purpose of the evidentiary hearing, in light of the parties' joint stipulation, was to give them an opportunity to submit evidence in support of their respective arguments concerning what conditions might be appropriate.

9. The salient fact, as developed in the testimony before the Board, is that the Respondent attended work on the day of the incident despite being physically not able to perform her duties in a professional manner. She was recovering from an auto accident and taking prescription medication that was incompatible with her duties on the day in question.

10. At the hearing of this contested case, the parties presented evidence to support their respective positions. The State argued that the Respondent's suspension should continue pending further improvement from a recently received diagnosis from David Lord, Ph.D. The Respondent argued that the suspension should be lifted and that she would accept "standard" conditions to return to work.

11. During the more thorough investigation, between the November 2005 summary suspension hearing and this disposition hearing, the Respondent saw Dr. Lord who evaluated her and found

[Respondent] categorically denies any diversion of medications, misuse of prescribed drugs or abuse of substances since 1989 [when she had an admitted and active substance abuse problem]. She avers that she has no current, active involvement in the misuse of controlled substances. Supporting her statement are the reports from her personal physician and most recent work supervisor. Her veracity is difficult to prove or disprove, there having been no thorough, immediate investigation or medial evaluation done at the time of the [incident]. Her unusual behavior on that occasion could possibly be explained, as her physician suggests, by a recent change[] in her psychopharmacological prescriptions in combination with Flexeril taken for pain resulting from a recent auto accident on July 5. . . . [Respondent's] her history raises the possibility that her prior vulnerability to drug misuse and/or abuse has resurfaced . . .

State's Exhibit 1.

12. Because Dr. Lord could not rule out the possibility that she might misuse prescription medication or alcohol in the future, he gave her a diagnosis of "poly-substance abuse in *partial* remission."

13. It is the State's position that Respondent's license should remain suspended until she receives a diagnosis of "*full* remission."

14. Respondent's position is that she is able to return to nursing. She argues that the incident giving rise to the summary suspension has been investigated and that she did nothing illegal or improper regarding controlled substances. Rather, she points out that

she used poor judgment going to work on a day when she was too ill to perform her duties properly.

15. The Respondent's physician, John Leppman, M.D. testified. He stated that she is being treated for depression and anxiety. He stated that she is prescribed both an antidepressant and anti-anxiety medication.

16. Relative to the incident, Dr. Leppman's position is that

[Respondent] had been taking [an anti depressant] daily, prescribed by me . . . and had just increased the dose. She had sustained minor muscle injuries in an automobile accident several days earlier. This accident was caused by a deer running in front of her car while driving on I-91 at night and there is no reason to suspect that her driving skills were impaired. She has a prescription for Flexeril 10 mg. for the muscle pain, and had taken one of them that evening. It is entirely reasonable to postulate that the combined effects of the increased [anti-depressant] and the Flexeril had caused her cognitive problem [on the night of the incident] . . . we have no other good explanation for it.

I think it is important to emphasize that her behavior that evening, however, it may have impaired good patient care, did not suggest that she was trying to divert narcotics. . . Her behavior was indicative of delirium, not of intentional deception.

Respondent Ex. 2.

17. Dr. Leppman also testified that the Respondent is currently prescribing medication to the Respondent for anxiety and depression.

18. Dr. Leppman testified, relative to the Respondent's current medications, that they would not impair her ability to work safely as a nurse. He further stated that his opinion was also influenced by his professional experience with "many" other nurses who practice the profession safely and without impairment while being treated with similar, or the same, medications as the Respondent.

19. The Respondent also entered into evidence an affidavit from Douglas Haralson who is the Clinical Manager of the Adult Intensive Unit of the Brattleboro Retreat, (the Retreat) in Brattleboro, Vermont, a hospital specializing in psychiatric treatment and substance abuse disorders. Mr. Haralson observed the Retreat has strict procedures for accounting patient medications and reporting any discrepancies. Respondent Exhibit 1.

20. Mr. Haralson's affidavit informed that while the Respondent worked under his supervision, from approximately September through November 2005, the Respondent "always presented herself in a manner expected of our nursing staff. *Id.* Additionally he stated:

[Ms. Snyder] consistently exhibits absolute professionalism and competence and at no time has she appeared or acted in any manner resembling someone who is incapable of rendering the highest level of nursing care. Since Ms. Snyder began working under my supervision, we have had no medication count discrepancies, and at no time have I ever suspected Ms. Snyder of any sort of misconduct involving medication. Given my extensive contact with Ms. Snyder, in a professional capacity, I have no reason to believe that the public health, safety, or welfare of the . . . patients at the Brattleboro Retreat are in any way threatened or compromised by Ms. Snyder's continued employment as a registered nurse.

Respondent Exhibit 1.

21. The Respondent, in her testimony, argued that she was no risk to patients and that she would accept any conditions on her license needed to give the Board confidence. She credibly denied diverting any medication and freely acknowledged her lapse in judgment by working while physically unfit to do so on the day of the incident.

22. The Board, however, still has concerns.

23. Based on Dr. Lord's observation that the Respondent is in "partial remission" rather than "full remission," the Board agrees with the State's argument that the possibility exists that Respondent may still present a risk. *See* State's Exhibit 1. The Board will infer that lifting the Respondent's suspension at this time could jeopardize public safety.

24. For this reason, until the Respondent can obtain a diagnosis of full remission or show other good cause, her license will remain suspended.

25. It is the Board's hope that after the Respondent is no longer diagnosed, as testified by Dr. Lord, with poly-substance abuse partial remission or after she can otherwise show that she does not pose a risk of potential relapse that she will petition for reinstatement.

26. At that time, the Board will be able to consider reinstating her license under conditions. Until that time, however, her license shall remain suspended.

27. Finally, the State argues that Respondent's license should not be reinstated until she is no longer under pharmacological care, or is under different pharmacological care, for her anxiety.

28. The Board disagrees with this position and does not want to be in a position of requiring a nurse to go against physician's orders and potentially becoming "physically or psychologically" unfit to practice. *See, e.g.,* 3 V.S.A. § 129a (a)(5) ("Practicing the profession [of nursing] when medically or psychologically unfit to do so" constitutes

grounds for discipline). Obviously, that is exactly one of the reasons Ms. Snyder came before this Board. She went to work when medically unfit to do so.

29. Indeed, given 3 V.S.A. § 129a (a)(5)'s demand that a nurse not practice "when physically or psychologically unfit to do so," a nurse would be put in an impossible position if required, on the one hand, to be healthy enough to practice; but on the other hand, commanded by this Board to ignore the recommendations of the licensed medical health professional entrusted with the "physical and physiological fitness" of that very nurse.

30. It was the uncontroverted testimony of Dr. Leppman that the Respondent's current medications do not impair her ability to work safely as a nurse. The Respondent so testified as well. Dr. Leppman also explained that his professional experience was that other professionals practice safely while being treated with the same or with similar medications as the Respondent is receiving for her conditions. Unlike the combination of medications used on the evening of the incident, which the Respondent freely admits impaired her, the Board received no evidence that Respondent's current medical treatment adversely affects her ability to practice her profession competently. In fact, Dr. Leppman testified to the contrary and Mr. Haralson's affidavit strongly suggests otherwise as well. *See* Respondent Exhibit 1.

31. Obviously, the Board does not want to micromanage a licensee's medical treatment. Those decisions are for a licensee's health care professionals, not a State regulatory agency. If Respondent or any other licensee is receiving treatment, including taking medication that "renders them medically unfit to practice the profession," then they have a professional obligation to refrain from working. However, the Board will not speculate in advance as to which medical treatments or conditions may trigger this decision.

32. Decisions about treatment modalities are best suited for licensees and their health care providers. The Board will therefore not step into the physician-patient relationship as the State asks it to do.

33. Whether the Respondent's license is reinstated at some point will be based on a record demonstrating that she is safe to practice the profession. The test will not be based, however, on what medical conditions she has and how they are being treated.

Conclusion:

34. Consistent with these findings, the Respondent's license shall remain suspended.

35. The Board finds that Respondent engaged in unprofessional conduct on the night of the incident. Furthermore, relying on Dr. Lord's diagnosis, the Board finds that Respondent may pose a risk of relapse.

ORDER

Based on the findings of facts set forth above, the Board of Nursing therefore continues the SUSPENSION of Respondent's license.

The Respondent may petition for reinstatement, consistent with the findings of this Administrative Determination and pursuant to the Administrative Rules of the Board of Nursing.

- END -

*(signature page to follow)*

Vermont Board of Nursing:

By: Susan O. Farrell  
Susan O. Farrell, RN  
Board Chairperson

Date: Feb. 14, 2007

OFFICE OF PROFESSIONAL REGULATION

DATE OF ENTRY: 2/26/07

## APPEAL RIGHTS

This is a final administrative determination by the Vermont Board of Nursing.

Pursuant to 3 V.S.A. § 130a, a party aggrieved by a final decision of a state licensing board may appeal the decision by filing a written Notice of Appeal with the Director of the Office of Professional Regulation, Vermont Secretary of State, 26 Terrace Street, Montpelier, Vermont 05609-1101 within 30 days of the entry of the order.

If you file an appeal, the Director of the Office of Professional Regulation assigns the case to an appellate officer. The appellate officer reviews the order based on the record created before the board. In cases of alleged irregularities in procedure before the board, not shown in the record, the appellate officer may take proof on that issue. *See* 3 V.S.A. §§ 129(d) and 130a.

STATE OF VERMONT  
SECRETARY OF STATE  
OFFICE OF PROFESSIONAL REGULATION  
BOARD OF NURSING

IN RE:

DENISE M. SNYDER  
License No. 026-0024725

Docket No: NU 13-0905

STIPULATION OF FACT AND UNDERSTANDING

NOW COMES the State of Vermont, by and through its State Prosecuting Attorney Edward G. Adrian and Denise M. Snyder who stipulate and agree as follows:

**Board Authority**

1. The Vermont State Board of Nursing ("the Board") has authority to issue warnings or reprimands, suspend, revoke, limit, condition current licenses, or prevent the renewal of lapsed licenses if, after disciplinary hearing, the Board finds that the Respondent has engaged in unprofessional conduct pursuant to 3 V.S.A. §§129, 129a, and 814; 26 V.S.A. §1582; the Administrative Rules of the Board of Nursing; and the Rules of the Office of Professional Regulation.
2. Failure to comply with the provisions of state statutes or rules governing the practice of the profession is unprofessional conduct upon which the Board can base disciplinary action. 3 V.S.A. §129a(a)(3).
3. The inability to practice nursing by reason of any cause is unprofessional conduct upon which the Board can base disciplinary action. 26 V.S.A. §1582(a)(3).
4. This inability to practice nursing competently includes the performance of unsafe or unacceptable patient care pursuant to the Administrative Rules of the Board of Nursing, Chapter 4, Rule IV(II)(B)(1), and failing to conform to the essential standards of acceptable and prevailing nursing practice pursuant to the Administrative Rules of the Board of Nursing, Chapter 4, Rule IV(II)(B)(2).

**Stipulation of Facts**

5. Denise M. Snyder (the "Respondent") of Bellows Falls, Vermont is a registered nurse holding license number 026-0018399, issued by the State of Vermont. This license was originally issued on or about June 16, 1988 and is set to expire on March 31, 2007.
6. On or about July 15, 2005 the Respondent was employed as a nurse at the Southern Vermont Correctional Facility (the "Facility") in Springfield, Vermont.
7. On or about July 15, 2005 the Respondent was sent home because her speech was slurred, she appeared dizzy and disorganized and her supervisor felt that the Respondent

STATE OF VERMONT



Prosecuting Attorney  
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was unable to carry out her duties. In addition, the medication room that she was in charge of was in disarray. At this time it was discovered that six Vicoden tablets were missing and one Tylenol with codeine tablet was missing.

8. On or about July 19, 2005 the Respondent obtained a 14 day supply of Lorazepam. On or about July 24, 2005 the Respondent obtained another 14 day supply of Lorazepam. On or about July 29, 2005 the Respondent obtained a 10 day supply of Lorazepam. On or about August 4, 2005 the Respondent obtained another 10 day supply of Lorazepam. On or about August 5, 2005 the Respondent obtained a 14 day supply of Lorazepam. On or about August 11, 2005 the Respondent obtained a 30 day supply of Lorazepam. On or about August 26, 2005 the Respondent obtained 28 tablets of Alprazolam. On or about September 4, 2005 the Respondent obtained another 28 tablets of Alprazolam. On or about September 9, 2005 the Respondent obtained 120 tablets of Lorazepam.
9. The Respondent was disciplined and conditioned on June 9, 1989 by this Board.
10. On or about October 7, 2005 the Respondent met with Investigator Steve Kennedy and admitted to impairment on July 15, 2005. She took full responsibility for the loss of the narcotics under her control.
11. Respondent's nursing license was summarily suspended by this Board on or about November 14, 2005.

#### Understanding

- A. The Respondent admits the facts above are true.
- B. The Respondent recognizes that based on the facts admitted above, the Board has the authority to discipline her license to practice nursing.
- C. At this time, the Respondent does not wish to enter into a consent order with the State concerning the appropriate disciplinary sanction in this matter.
- D. The Respondent agrees that since the facts are not disputed in this matter, she voluntarily waives her right to a hearing on the merits. Instead, the State and Respondent agree to proceed to a disposition hearing.
- E. At the disposition hearing, the State is free to argue for what it deems to be the appropriate sanctions. Likewise, the Respondent is free to argue for what she feels are the appropriate sanctions, if any.
- F. The State and the Respondent agree to abide by the decision of the Board concerning sanctions.
- G. The Respondent is not under the influence of any drugs or alcohol at the time she signs this Stipulation.
- H. The Respondent voluntarily enters into this agreement after the opportunity to consult with legal counsel and is not being coerced by anyone into signing this Stipulation.
- I. Respondent voluntarily waives her right to a contested hearing on the merits before the Board of Nursing.

STATE OF VERMONT



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02/02/2006 THU 8:38 FAX

AGREED TO:

Dated

2/2/06STATE OF VERMONT  
SECRETARY OF STATE

By:

Edward G. Adrian  
State Prosecuting AttorneyDENISE M. SNYDER  
RESPONDENT

By:

Denise M. Snyder  
Denise M. Snyder

As to Form:

By:

Steven B. Wright  
Steven B. Wright, Esq.  
Attorney for Respondent

an.snyder,scot@pt

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STATE OF VERMONT  
BOARD OF NURSING

In re: Denise Snyder }  
License No. 026-0018399 }

Docket No. NU13-0905

**SUMMARY SUSPENSION ORDER**

On 14 November 2005, this matter came before the Vermont State Board of Nursing on the prosecution's Request for Summary Suspension pursuant to 3 V.S.A. § 814(c). The Board has authority to summarily suspend a license pending further proceedings if it determines that public health, safety or welfare imperatively require emergency action.

**Findings of Fact:**

Based on a review of the pleadings, the file, and the evidence presented to the Board at the hearing on this matter, the Board finds:

1. The Respondent is licensed by and subject to the disciplinary authority of this Board. 26 V.S.A. Chapter 28, 3 V.S.A. § 129(a), and the Administrative Rules of the Office of Professional Regulation.
2. The State filed a "Request for Summary Suspension" dated 2 November 2005 (attached) alleging that Respondent is unable to practice nursing competently by reasons of the use of prescription medication.
3. The State further alleges that public health, safety or welfare imperatively requires emergency action, and the state asks this Board to summarily suspend the Respondent's license.
4. The State provided the Respondent with notice of this matter and the Respondent appeared at the hearing.
5. The Board has considered the evidence related to the allegations in the State's Request for Summary Suspension.
6. The Board finds that the State, in presenting evidence in support of its Request for Summary Suspension, has shown that emergency action is needed to protect the public health, safety and welfare.

**Conclusions of Law:**

The prosecution's Request for a Summary Suspension is supported by the evidence as required by 3 V.S.A. § 814(c). The Board concludes that the public health, safety and welfare imperatively require emergency action.

**Order:**

Pursuant to 3 V.S.A. § 814(c), the Board issues the following order which shall remain in effect until further action by the Board.

The Respondent's license is summarily suspended pending proceedings for revocation or other action. These proceedings shall be promptly instituted and determined.

Vermont Board of Nursing

By: Susan Farrell  
Susan Farrell, RN, Chair

Date: Nov. 28, 2005

OFFICE OF PROFESSIONAL REGULATION

DATE OF ENTRY: 11/30/05

## APPEAL RIGHTS

This is a final administrative determination by the Vermont Board of Nursing.

A party aggrieved by a final decision of a board may appeal this decision by filing a written Notice of Appeal with the Director of the Office of Professional Regulation, Vermont Secretary of State, 26 Terrace Street, Montpelier, Vermont 05609-1101 within 30 days of the entry of this order.

If an appeal is filed, the Director of the Office of Professional Regulation shall assign the case to an appellate officer. The review shall be conducted on the basis of the record created before the board. In cases of alleged irregularities in procedure before the board, not shown in the record, proof on that issue may be taken by the appellate officer. 3 V.S.A. §§ 129(d) and 130a.

To request a stay of the Board's decision, please refer to the attached stay instructions.

IN RE: DENISE M. SNYDER ) DOCKET No. NU13-0905  
License No. 026-0018399 )

Lorazepam. On or about August 26, 2005 the Respondent obtained 28 tablets of Alprazolam. On or about September 4, 2005 the Respondent obtained another 28 tablets of Alprazolam. On or about September 9, 2005 the Respondent obtained 120 tablets of Lorazepam.

6. The Respondent was disciplined and conditioned on June 9, 1989 by this Board.
7. On or about October 7, 2005 the Respondent met with Investigator Steve Kennedy and admitted to impairment on July 15, 2005. She took full responsibility for the loss of the narcotics under her control, but could not remember clearly if she took the narcotics herself, as a result of her impairment.
8. Respondent's nursing license was summarily suspended by this Board on or about November 14, 2005.

### Charges

9. The acts, omissions and/or circumstances described above constitute grounds for discipline because the Respondent has committed unprofessional conduct in violation of:
  - i. 3 V.S.A. § 129a(a) (3) (failing to comply with provisions of federal or state statutes or rules governing the practice of the profession);
  - ii. 26 V.S.A. § 1582(a)(3)(is unable to practice nursing competently by reason of any cause); Vermont Board of Nursing Administrative Rules Chapter 4, Rule IV, II, C ("Any cause" includes, but is not limited to, reasons of physical or mental disability or use of drugs, narcotics, chemicals or any other type of materials);
  - iii. 26 V.S.A. § 1582(a)(5) (is addicted to the use of habit forming drugs); and
  - iv. 26 V.S.A. § 1582(a)(7)(engages in conduct of a character likely to deceive, defraud or harm the public).

### Relief Requested

**WHEREFORE**, the license of Denise M. Snyder should be revoked, suspended, reprimanded, conditioned or otherwise disciplined.

**DATED** at Montpelier, Vermont this 28<sup>th</sup> day of November, 2005.

STATE OF VERMONT



Prosecuting Attorney  
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STATE OF VERMONT  
SECRETARY OF STATE

By:

Edward G. Adrian  
State Prosecuting Attorney

nu.snyder.soc

IN RE: DENISE M. SNYDER ) DOCKET No. NU13-0905  
License No. 026-0018399 )

## Board Authority

- ## Statement of Facts



**Prosecuting Attorney  
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7. The Respondent was disciplined and conditioned on June 9, 1989 by this Board.
8. On or about October 7, 2005 the Respondent met with Investigator Steve Kennedy and admitted to impairment on July 15, 2005. She took full responsibility for the loss of the narcotics under her control, but could not remember clearly if she took the narcotics herself, as a result of her impairment.

### Request for Relief

9. The facts as set out above establish that in order to protect the public health, safety or welfare of the people of the State of Vermont emergency action is imperative.
10. The above acts and circumstances, alone or in combination, violate: 3 V.S.A. § 129a(a) (3) (failing to comply with provisions of federal or state statutes or rules governing the practice of the profession); 26 V.S.A. § 1582(a)(3)(is unable to practice nursing competently by reason of any cause); Vermont Board of Nursing Administrative Rules Chapter 4, Rule IV, II, C ("Any cause" includes, but is not limited to, reasons of physical or mental disability or use of drugs, narcotics, chemicals or any other type of materials). 26 V.S.A. § 1582(a)(5) (is addicted to the use of habit forming drugs); 26 V.S.A. § 1582(a)(7)(engages in conduct of a character likely to deceive, defraud or harm the public);

**WHEREFORE**, the State of Vermont respectfully requests that pursuant to 3 V.S.A. § 814(c), the Respondent's nursing license number 026-0018399 be summarily suspended, pending a hearing on the merits.

**DATED** at Montpelier, Vermont this 2nd day of November, 2005.

STATE OF VERMONT  
SECRETARY OF STATE

By: \_\_\_\_\_

Edward G. Adrian  
State Prosecuting Attorney

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STATE OF VERMONT



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