

**STATE OF CONNECTICUT
CONNECTICUT MEDICAL EXAMINING BOARD**

Wilson F. Bernales, M.D.
License No. 053942

Petition No. 2015-1579

AMENDED MEMORANDUM OF DECISION

Procedural Background

On July 5, 2016, the Connecticut Department of Public Health ("Department") issued a Statement of Charges ("Charges") to the Connecticut Medical Examining Board ("Board") against license number 053942 for Wilson F. Bernales, M.D. ("Respondent"). Board Exhibit ("Bd. Ex.") 2. The Charges allege that Respondent's license is subject to disciplinary action pursuant to §§ 19a-17 and 20-13c of the Connecticut General Statutes ("Statutes"). The Notice of Hearing and the Charges were sent to Respondent, in care of his attorney, Gregory Pepe, Esq., by certified mail, return receipt requested, first class mail and electronic mail. Bd. Ex. 1. The Notice of Hearing scheduled the hearing in this matter for October 25, 2016. Bd. Ex. 1.

On October 18, 2016, Respondent requested a continuance of the hearing. Bd. Ex. 5. The continuance was granted and the hearing was continued until November 15, 2016. Bd. Ex. 5. On November 14, 2016, the Department filed a Motion to Amend the Statement of Charges ("the Motion"). The Motion was granted. Bd. Ex. 6. On November 15, 2016, a hearing commenced before a duly authorized panel of the Board ("Panel") comprised of Eric Hodgson, M.D., Velandy Manohar, M.D., and Edward McAnaney, Esq.¹ Bd. Ex. 1. On December 1, 2016, Respondent filed an Answer to the Amended Statement of Charges ("Charges"). Respondent Exhibit ("Resp. Ex.") A. The hearing proceeded for a second day on December 20, 2016.

¹ During the first day of hearing on November 15, 2016, Attorney Pepe appeared on behalf of Respondent and the Department entered exhibits into the record and rested its case. A second day of hearing was scheduled for Respondent to appear and testify. Transcript pages ("Tr., pp.") 35-36.

The Panel conducted the hearing in accordance with Chapter 54 of the Statutes, the Uniform Administrative Procedure Act, and § 19a-9-1 et seq. of the Regulations of Connecticut State Agencies (“Regulations”). Respondent was represented by Attorney Gregory Pepe; Attorney David Tilles represented the Department. Both parties were afforded the opportunity to present witnesses and evidence, examine and cross-examine witnesses, and provide argument on all issues.

All Panel members involved in this Memorandum of Decision (“Decision”) attest that they have heard the case or read the record in its entirety. The Board reviewed the Panel’s proposed final decision in accordance with the provisions of § 4-179 of the Statutes.

In rendering its decision, the Board considered whether Respondent poses a threat, in the practice of medicine, to the health and safety of any person. The Board’s decision is based entirely on the record and the specialized professional knowledge of the Panel in evaluating the evidence. *See* Conn. Gen. Stat. § 4-178; *Pet v. Department of Health Services*, 228 Conn. 651, 666 (1994). To the extent the findings of fact actually represent conclusions of law, they should be so considered, and vice versa. *SAS Inst., Inc., v. S & H Computer Systems, Inc.*, 605 F.Supp. 816 (Md. Tenn. 1985).

Allegations

Count One

1. In paragraph 1 of the Charges, the Department alleges that Respondent of Fayetteville, Arkansas is, and has been at all times referenced in the Charges, the holder of Connecticut physician and surgeon license number 053942.
2. In paragraph 2 of the Charges, the Department alleges that Respondent misrepresented or concealed one or more material facts in obtaining his license to practice in Connecticut, in or more of the following ways:
 - a. Respondent submitted an application for licensure in Connecticut on or about September 29, 2014. On that application, he falsely checked the box for “no” as to any suspension, termination or probation of any internship or postgraduate

training at any hospital. In fact, on or about January 24, 2002, Floyd Medical Center in Rome, Georgia, terminated Respondent's internship.

- b. Regarding the termination of Respondent's internship at Floyd Medical Center, Respondent falsely reported to the Federation Credentials Verification Service of the Federation of State Medical Boards ("FCVS") that his internship had been placed on probation, without being disciplined. Further, Respondent falsely reported that he had not received any reports by residency instructors of negative behavior; and/or
 - c. On Respondent's application for licensure in Connecticut, Respondent falsely checked the box for "no" as to any pending complaint, investigation or disciplinary action by any other state licensing body when, in fact, Respondent was at that time subject to a complaint, investigation or disciplinary action in Virginia.
3. In paragraph 3 of the Charges, the Department alleges that the above-described facts constitute grounds for disciplinary action pursuant to the General Statutes of Connecticut, § 20-13c, including but not limited to:
- a. § 20-13c(4); and/or
 - b. § 20-13c(6).

Count Two

4. In paragraph 4 of the Charges, the Department alleges that the allegations in paragraph 1 are incorporated herein as if set forth in full.
5. In paragraph 5 of the Charges, the Department alleges that on Respondent's application for renewal of his Connecticut license, submitted to the Department on or about May 25, 2015, Respondent falsely answered "no" as to disciplinary action taken or pending in another state when, in fact, Virginia had taken disciplinary action.
6. In paragraph 6 of the Charges, the Department alleges that Respondent's application for licensure in Virginia, submitted to that state's licensing authority in or around 2012, included one or more letters of recommendation that Respondent had forged.

7. In paragraph 7 of the Charge, the Department alleges that the above-described facts constitute grounds for disciplinary action pursuant to the General Statutes of Connecticut, § 20-13c, including but not limited to:
 - a. § 20-13c(4); and/or
 - b. § 20-13c(6).

Count Three

8. In paragraph 8 of the Charges, the Department alleges that the allegations in paragraph 1 are incorporated herein as if set forth in full.
9. In paragraph 9 of the Charges, the Department alleges that on or about March 17, 2016, in Docket No. BPMC 16-080, the New York Board for Professional Medical Conduct issued an order approving a Consent Agreement, by which Respondent's New York license to practice medicine was ordered changed to "inactive" status and Respondent was forbidden to practice medicine in New York. Said action was based on allegations that Respondent had submitted false information to the Virginia Board of Medicine and that Respondent had failed to disclose separation from a hospital training program in his 2003 application for licensure in New York.
10. In paragraph 10 of the Charges, the Department alleges that the above described facts constitute grounds for disciplinary action pursuant to the General Statutes of Connecticut, § 19a-17(f) and/or § 20-13(c).

Count Four

11. In paragraph 11 of the Charges, the Department alleges that the allegations in paragraph 1 are incorporated herein as if set forth in full.
12. In paragraph 12 of the Charges, the Department alleges that on Respondent's application for renewal of his Connecticut license, submitted to the Department on or about April 17, 2016, he correctly answered "yes" to question 36 as to disciplinary action taken or pending in another state but omitted the fact that Respondent was subject to a pending disciplinary action in Pennsylvania.
13. In paragraph 13 of the Charges, the Department alleges that the above-described facts constitute grounds for disciplinary action pursuant to the General Statutes of Connecticut, § 20-13c, including but not limited to:

- a. § 20-13c(4); and/or
- b. § 20-13c(6).

Findings of Fact

1. Respondent is, and has been at all times referenced in the Charges, the holder of Connecticut physician and surgeon license number 053942. Tr. 11/15/16, pp. 11, 12.
2. Respondent's address of record is from Fayetteville, Arkansas. Tr. 11/15/16, p. 11; Tr. 12/20/16, p. 21.
3. On January 24, 2002, Floyd Medical Center in Rome, Georgia ("Floyd Medical Center"), terminated Respondent's internship. Dept. Ex. 10; Tr., 12/20/16, pp. 19-20, 35-36.
4. Respondent falsely reported to the FCVS that his internship at Floyd Medical Center was placed on probation, without discipline. Dept. Exs. 7, 10; 12/20/16, pp. 26, 35-36.
5. Respondent falsely reported to the FCVS that he had not received any reports by residency instructors of negative behavior. Dept. Exs. 7, 10; 12/20/16, pp. 26, 36-38.
6. On April 15, 2003, Respondent submitted an application for a limited permit in medicine to New York State and failed to disclose his termination from the Floyd Medical Center internship program. Dept. Ex. 4.
7. Respondent admitted that in his 2012 application for licensure in Virginia, one or more letters of recommendation that he had submitted had been forged by him. Tr., 11/15/16, p. 16., Dept. Ex. 3; Resp. Ex. A.
8. On February 27, 2013, Respondent was requested to appear for an informal conference with the Virginia Board of Medicine on March 19, 2014 to afford Respondent the opportunity to demonstrate that he did not violate provisions of the Code of Virginia pertaining to: fraudulent, false and misleading information on his October 2, 2012 application; fraud or deceit in the course of obtaining admission to practice medicine; and, incompetence to practice medicine with reasonable skill and safety. Dept. Ex. 3.

9. On March 24, 2014, the Credentials Committee of the Department of Health Professions for the Commonwealth of Virginia denied Respondent's application to practice medicine and surgery. Dept. Ex. 3.
10. On July 14, 2014, Respondent requested a formal hearing before the Virginia Board of Medicine. Dept. Ex. 3.
11. On September 29, 2014, Respondent submitted an application for licensure in Connecticut. Dept. Ex. 6; Tr. 11/15/16, p. 13.
12. On September 29, 2014, Respondent falsely checked the box for "no" on his application for licensure in Connecticut as to any suspension, termination or probation of any internship or postgraduate training at any hospital when, in fact, his internship at Floyd Medical Center was terminated. Dept. Exs. 6, 10; Tr. 12/20/16, pp. 34-38.
13. On September 29, 2014, Respondent falsely checked the box for "no" as to any pending complaint, investigation or disciplinary action by any other state licensing body, when, in fact, Respondent was at that time subject to a complaint, investigation or disciplinary action in Virginia. Dept. Ex. 3; Tr. 12/20/16, p. 20.
14. On or about March 15, 2015, Respondent was granted a Connecticut license to practice medicine and surgery. Dept. Ex. 1, pp. 2, 3.
15. The hearing before the Virginia Board of Medicine convened on May 14, 2015. Dept. Ex. 3
16. Respondent admitted that on May 25, 2015, Respondent submitted an application for renewal of his Connecticut license and falsely answered "no" as to disciplinary action taken or pending in another state when, in fact, disciplinary action was pending in Virginia. Dept. Exs. 3, 8; Tr., 11/15/16, p. 15; Tr. 12/20/16, p. 20.
17. On July 15, 2015, the Commonwealth of Virginia denied Respondent's application for a Virginia medical license. Dept. Ex. 3; Resp. Ex. A; Tr., 11/15/16, p. 15.
18. Respondent admitted that on March 17, 2016, in Docket No. BPMC 16-080, the New York Board for Professional Medical Conduct issued an order approving a Consent Agreement, by which Respondent's New York license to practice medicine was ordered changed to "inactive" status and Respondent was forbidden to practice medicine in New York. Said action was based on allegations that Respondent submitted false information to the Virginia Board of Medicine and that Respondent failed to disclose termination from a hospital training program in his 2003 application

for licensure in New York. Dept. Ex. 4; Resp. Ex. A; Tr. 11/15/16, p. 16; Tr. 12/20/16, p. 20-21.

19. On March 29, 2016, formal disciplinary action was filed against Respondent by the Commonwealth of Pennsylvania, Department of State, and Respondent was issued an Order to Show Cause in writing as to why his license should not be suspended, revoked or otherwise restricted. Dept. Ex. 5; Tr., p. 21
20. On April 17, 2016, Respondent applied for renewal of his Connecticut License. Dept. Ex. 9.
21. Respondent admitted that on his April 17, 2016 renewal application, Respondent correctly answered "yes" to question 36 as to disciplinary action taken or pending in another state, but omitted the fact that he was subject to a pending disciplinary action in Pennsylvania. Dept. Ex. 9; Resp. Ex. A; Tr. 11/15/16, pp. 22-24; Tr. 12/20/16, p. 6.

Discussion and Conclusions of Law

Section 20-13c of the Statutes provides, in pertinent part, that:

The board is authorized to restrict, suspend or revoke the license or limit the right to practice of a physician or take any other action in accordance with section 19a-17, for any of the following reasons: ... (4) illegal, incompetent or negligent conduct in the practice of medicine... (6) misrepresentation or concealment of a material fact in the obtaining or reinstatement of a license to practice medicine.... In each case, the board shall consider whether the physician poses a threat, in the practice of medicine, to the health and safety of any person. If the board finds that the physician poses a threat, the board shall include such finding in its final decision and act to suspend or revoke the license of said physician.

The Department bears the burden of proof by a preponderance of the evidence in this matter. *Jones v. Connecticut Medical Examining Board*, 309 Conn. 727, 739-40 (2013).

With respect to allegations numbered 1, 4, 8 and 11 of the Charges, Respondent admits that Fayetteville, Arkansas is his address of record, and respondent admits that at all times referenced in the Charges, he is the holder of Connecticut physician and surgeon

license number 053942. Tr. 11/15/16, pp. 11-12 Bd. Ex. 2. Respondent testified he moved from Arkansas to Wyoming, but his current address is still Arkansas. Tr. 12/20/16, p. 21. The Department proved the allegation in paragraph 1, 4, 8 and 11 of the Charges.

Count One

With respect to allegation number 2a of the Charges, Respondent admits that when he submitted an application for licensure in Connecticut on September 29, 2014, he falsely checked the box for “no” as to any suspension, termination or probation of any internship or postgraduate training at any hospital, and that his internship at Floyd Medical Center was terminated on or about January 24, 2002. Tr. 11/15/16, pp.12-13; Tr. 12/20/16, p. 18. To further support its position, the Department submitted a copy of Respondent’s September 29, 2014 application for a Connecticut license and a letter dated September 30, 2008 from the Residency Director at Floyd Medical Center indicating Respondent’s internship was terminated. Dept. Exs. 6, 10. As such, the Department sustained its burden of proof, and the Board finds that Respondent’s concealment of the termination of his internship at Floyd Medical Center constitutes a violation of § 20-13c(6) of the Statutes.

With respect to the allegation in paragraph 2b of the Charges, Respondent denies falsely reporting to the FCVS that his internship was placed on probation without discipline, and further denies that he received any reports by residency instructors of negative behavior. Dept. Ex. 10; Tr. 12/20/16, pp. 32, 33. Respondent asserts that although he was disciplined, he was placed on probation first, and that he was terminated from the Floyd Medical Center program for a dispute he had with a resident concerning intubation of a patient who had a living will. Tr. 12/20/16, pp. 34-38.

The FCVS is a database service that retains a record for state licensure boards of practitioners’ career history and discipline to prevent forum shopping. Tr. 12/20/16, pp. 25, 26. Respondent paid the FCVS to forward his records for each of his state licensure applications. Tr. 12/20/2016, p. 28. Therefore, the FCVS report was forwarded to Connecticut when Respondent applied for his Connecticut medical license.

The Department submitted a copy of a form entitled "Applicant Reported Unusual Circumstances" ("the form") and the September 30, 2008 letter from the Floyd Medical Center Residency Director. Dept. Ex. 10. The form was filled out and submitted by Respondent to the FCVS. Dept. Ex. 10; Tr. 12/20/16, p. 28. Respondent answered "No" for the questions: "[w]ere you ever disciplined or placed under investigation?" and, "[w]ere any negative reports for behavioral reasons ever filed by instructors?" Dept. Ex. 10. The September 30, 2008 letter from the Floyd Medical Center Residency Director stated that Respondent was dismissed from the Floyd Medical Center residency program "after receiving feed-back from multiple individuals, including our residents, local community faculty and our attending faculty." Dept. Ex. 10. As such, a preponderance of the evidence establishes that Respondent falsely reported to the FCVS that his internship was placed on probation without discipline, and that he did not receive any reports by residency instructors of negative behavior in violation of § 20-13c(6) of the Statutes. Dept. Ex. 10; Tr. 12/20/16, pp. 26, 35-36.

With respect to the allegation in paragraph 2c of the Charges, Respondent admits that on his September 29, 2014 application for licensure in Connecticut he falsely checked the box for "no" regarding any pending complaint, investigation, charge or disciplinary action by any other state when he had a pending investigation in Virginia at the time of his application. Tr. 12/20/2016, pp. 19, 20. He claims that he did not disclose it because the Virginia matter was "still ongoing," Tr. 12/20/16, p. 20, but Respondent's claim is contrary to the explicit request for disclosure of *pending* complaints, investigations, charges, or disciplinary actions on the application. Dept. Ex. 6. The Department submitted a copy of Respondent's September 29, 2014 Connecticut licensure application, documents relating to the Virginia investigation, and the Order issued by the Virginia Board of Medicine in Respondent's matter, thereby satisfying its burden of proof. Dept. Exs. 3, 6. Respondent's admission constitutes a violation of § 20-13c(6) of the Statutes.

Count Two

Respondent admits to the allegations in paragraphs 5 and 6 of the Charges. Specifically, Respondent admits that on his May 25, 2015 application for renewal of his Connecticut license, he falsely answered “no” regarding disciplinary action taken or pending in another state, while he was subject to pending disciplinary action in Virginia (Tr. 12/20/16, p. 20), and that he included one or more letters of recommendation with his application for licensure in Virginia that he forged (Tr. 12/20/16, pp. 31). Respondent’s admission coupled with the Department’s submission of Respondent’s May 25, 2015 Connecticut licensure renewal application and the documents relating to the Virginia disciplinary action establishes by a preponderance of the evidence that Respondent misrepresented and concealed material facts in the obtaining of his license in violation of § 20-13c(6) of the Statutes.

Count Three

As alleged in paragraph 9 of the Charges, Respondent admits that after a Consent Agreement was approved, the status of his license was ordered “inactive” and he is prohibited from practicing medicine in New York based on allegations that he submitted false information to the Virginia Board of Medicine and failed to disclose separation from a hospital training program in his 2003 application for licensure in New York. The Department additionally submitted a copy of the Order from the New York State Board for Professional Medical Conduct (“New York Board”) as proof of Respondent’s misrepresentations and concealments.

In accordance with § 19a-17(f) of the Statutes:

[The Board] may take disciplinary action against a practitioner’s license . . . as a result of the practitioner having been subject to disciplinary action similar to an action specified in subsection (a) of this section by a duly authorized professional disciplinary agency of any state . . . [The Board] may rely upon the findings and conclusions made by a duly authorized professional disciplinary agency of any state . . . in taking such disciplinary action.

In this case, Respondent's New York license was subject to disciplinary action by the New York Board, a duly authorized professional disciplinary agency, similar to disciplinary action specified in subsection (a) of § 19a-17 of the Statutes. Therefore, in accordance with § 19a-17(f) of the Statutes, the Board is authorized to rely upon the findings and conclusions of the New York Board in taking its own disciplinary action against Respondent's license as it relates to Respondent's false information to the Virginia Board of Medicine and failure to disclose his separation from a hospital training program in his 2003 application for licensure in New York.

Count Four

Respondent admits that on his April 17, 2016 application for renewal of his Connecticut license, he answered "Yes" to question 36 regarding disciplinary action taken or pending in another state, but omitted that he was subject to pending disciplinary action in Pennsylvania, as alleged in paragraph 12 of the Charges. Respondent's concealment is evidenced by the Department's submission of Respondent's April 17, 2016 Connecticut licensure renewal application and the March 29, 2016 Notice of formal disciplinary action and Order to Show Cause from the Commonwealth of Pennsylvania Department of the State. Dept. Ex. 5, 9. Therefore, a preponderance of the evidence establishes that Respondent concealed his pending disciplinary action in Pennsylvania on his April 17, 2016 Connecticut licensure renewal application in violation of § 20-13c(6) of the Statutes.

For each of the Counts, Respondent asserts that his misrepresentations and concealments are the result of his difficulty organizing his career records as a locum tenens practitioner². Tr. 12/20/16, pp. 21-22. Respondent testified that he does not have a secretary to assist him to keep track of things, and that he has requested assistance compiling a list of all pending licenses, renewals, applications. Tr. 12/20/16, p. 22. He also testified he is confused by what he needs to report to other states. Tr., 12/20/16, p. 23. Respondent's reasoning for his actions is not a viable defense for his misrepresentation and concealment of material facts in obtaining a license to practice medicine. Moreover, the

² Locum tenens practitioners fill in for other physicians on a temporary basis to maintain patient care quality.

Respondent admits that he forged recommendations as part of his application for licensure. As such, the Board finds that Respondent's reporting of false and inaccurate information for licensing, as alleged in the Charges, is in violation of § 20-13c(6) of the Statutes.

Conclusion

In conclusion, the Department sustained its burden of proof with regards to the allegations in the Charges. Accordingly, the Board concludes that there is an adequate basis upon which to impose discipline on Respondent's license pursuant to §§ 19a-17 and 20-13c(6) of the Statutes, and that Respondent, based upon a significant history of fraud and deception, including the forging of letters or recommendation, and extreme disorganization may present a threat to the health and safety of persons in Connecticut. Respondent has expressed "regret" and acknowledges his "lack of good judgment." Respondent Exhibit A, and the Board does not have any allegations before it that he has harmed any patient. Nonetheless, respondent's conduct violates Connecticut law, and it warrants the imposition of discipline against his license.

Order

Based upon the record in this case, the above findings of fact and the conclusions of law, and pursuant to the authority vested in it by Conn. Gen. Stat. §19a-17 and §20-13c, the Board finds, with respect to license number 053942 held by Wilson F. Bernales, M.D., that the violations alleged and proven in Counts One, Two, Three, and Four in Petition No. 2015-1579 warrant the disciplinary action imposed by this Order:

1. As respondent's license expired on June 30, 2017, and as he has agreed, for a period of two years, to not seek renewal of his physician's license or to seek a new physician license pursuant to the Stipulated Judgment entered as an Order of the Connecticut Superior Court on August 17, 2017, no revocation of his physician license is necessary. Respondent has agreed to never seek a license, except a physician license, as such term is defined in Conn. Gen. Stat. § 4-166(8), of any kind from the Department. Respondent has also agreed that, after a period of two years, should he

seek a new license or to renew the license that has expired, the Department and the Board will have absolute discretion regarding whether to grant his request.

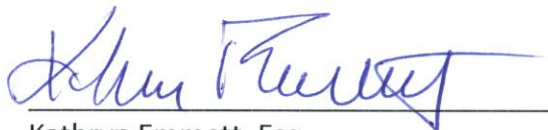
2. For the violations in Count One, Two, Three and Four, Respondent's shall pay a civil penalty in the amount of five thousand dollars (\$5,000.00) by certified check payable within five (5) business days of the Board's signing of this Amended Memorandum of Decision. Such check shall be mailed to the address printed below.
3. This Amended Memorandum of Decision, along with the Stipulated Judgment, will be reported to the National Practitioner Data Bank and reported consistent with Department policy and procedure.
4. All correspondence related to this Memorandum of Decision must be mailed to:

Lavita Sookram, Nurse Consultant
Department of Public Health
Division of Health Systems Regulations
410 Capitol Avenue, MS#12HSR
P.O. Box 340308
Hartford, CT 06134-0308

Ms. Sookram may also be contacted at the following e-mail address:

Lavita.Sookram@ct.gov.

Connecticut Medical Examining Board

A handwritten signature in blue ink, appearing to read 'Kathryn Emmett', is written over a horizontal line.

Kathryn Emmett, Esq.
Chairperson

September 19, 2017

CERTIFICATION


I hereby certify that, pursuant to Connecticut General Statutes § 4-180(c), a copy of the foregoing Memorandum of Decision was sent this 19th day of September 2017, by certified mail, return receipt requested to:

Gregory Pepe, Esq.
Neubert, Pepe & Monteith, PC
195 Church Street, 13th Floor
New Haven, CT 06510

Certified Mail RRR #91-7199-9991-7038-0244-8789

and via email to:

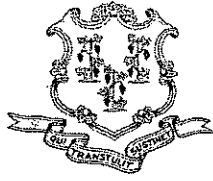
Matthew Antonetti, Principal Attorney
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Jeffrey A. Kardys
Administrative Hearings Specialist
Department of Public Health
Public Health Hearing Office

STATE OF CONNECTICUT

DEPARTMENT OF PUBLIC HEALTH



Raul Pino, M.D., M.P.H.
Commissioner

Dannel P. Malloy
Governor
Nancy Wyman
Lt. Governor

Practitioner Licensing and Investigations Section

September 25, 2017

Wilson F. Bernales, MD
3202 Dewar Drive, Apt 2
Rock Springs, WY 82901

Re: Amended Memorandum of Decision
Petition No.: 2015-1579
License No.: 053942

Dear Dr. Bernales:

Please accept this letter as notice that you have satisfied the requirement of the civil penalty.

Notice will be sent to the appropriate sections at the Department of Public Health to address your license restrictions related to the above referenced Amended Memorandum of Decision. As you know, your license expired on June 30, 2017 and you agreed for a period of two years, to not seek renewal of your physician license or seek a new physician license. You agreed to never seek a license, except a physician license from the Department of Public Health. You further agreed that should you seek a new license or renew your license that had expired following the two years restriction, the Department and the Connecticut Medical Examining Board will have absolute discretion regarding whether to grant your request.

Thank you for your cooperation in this process.

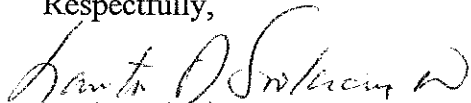


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Respectfully,

A handwritten signature in cursive script, appearing to read 'Lavita D. Sookram', written in dark ink.

Lavita D. Sookram, RN, BSN

Nurse Consultant

Practitioner Licensing and Investigations Section

cc: J. Kardys
S. Carragher
C. Miranda
M. Bennett
M. Garcia