

## Statement of Charges Pending (See Attached)

A Statement of Charges is the document that contains the Department of Public Health's allegations against a practitioner that result from a formal investigation of the practitioner. Unless a summary suspension has been granted or the practitioner is currently subject to the terms of a previous disciplinary action or other agreement (which would also be posted on this site), the practitioner is eligible to continue to practice without restriction while a Statement of Charges is pending. The Board or Commission, or the Department of Public Health for professions where there is no Board or Commission, will determine what discipline, if any, is appropriate.

**STATE OF CONNECTICUT  
DEPARTMENT OF PUBLIC HEALTH  
HEALTHCARE QUALITY AND SAFETY BRANCH**

In re: Henry D. Todd, MD

Petition Number: 2024-996

**STATEMENT OF CHARGES**

Pursuant to Connecticut General Statutes §§19a-10 and 19a-14, the Department of Public Health ("Department") brings the following charges against Henry D. Todd:

1. Henry D. Todd ("Respondent") is and has been at all times referenced in this Statement of Charges, the holder of Connecticut physician and surgeon license number 049904.
2. From approximately 2012 through October 25, 2022, Respondent provided care and treatment for Patient #1.
3. From approximately September 17, 2015 through October 25, 2022, Respondent provided care and treatment for Patient #1 during which time he prescribed medications, including controlled substances. Respondent violated the standard of care in one or more of the following ways, including, but not limited to, when he failed to:
  - a. appropriately treat, assess, and/or examine Patient #1;
  - b. prescribe controlled substances with clinical justification;
  - c. order urine screen toxicology tests;
  - d. maintain appropriate medical records; and/or
  - e. appropriately review the Connecticut Prescription Monitoring and Reporting System.
4. On multiple occasions from approximately 2012 through May 2024, Respondent engaged in illegal, incompetent and/or negligent conduct in the practice of medicine with Patient #1 in one or more of the following ways, including, but not limited to, when he:
  - a. engaged in sexual contact with Patient #1;
  - b. caused Patient #1 to engage in sexual contact in exchange for prescriptions for medications including controlled substances; and/or
  - c. violated patient-health care provider boundaries, including, but not limited to, socializing with Patient #1, exchanging text messages and phone calls, meeting with her at motels, driving with her in his motor vehicle, and/or giving her gifts.

5. From approximately January 1, 2023 through May 29, 2024, Respondent accessed Patient #1's healthcare records multiple times without clinical justification and/or when he was not her active health care provider ("inappropriate access").
6. Respondent's inappropriate access included over twenty-five hundred (2500) distinct access points.
7. Respondent used the information he obtained from the inappropriate access to contact Patient #1 and/or solicit unwanted sexual contact.
8. On multiple occasions in 2023, April 16, 2024 and/or May 2, 2024, Respondent prescribed medications, including controlled substances, for Patient #1 without clinical justification and/or when he was not her active health care provider.
9. On multiple occasions in 2023, April 16, 2024 and/or May 2, 2024, Respondent prescribed medications, including controlled substances to cause Patient #1 to engage in sexual activities with him.
10. From approximately September 10, 2015 through November 10, 2023, Respondent provided care and treatment for Patient #2 during which time he prescribed medications, including controlled substances. Respondent violated the standard of care in one or more of the following ways, including, but not limited to, when he failed to:
  - a. appropriately treat, assess, and/or examine Patient #2;
  - b. prescribe controlled substances with clinical justification;
  - c. prescribe controlled substances without addressing Patient #2's substance abuse;
  - d. consistently order and/or review urine screen toxicology tests;
  - e. maintain appropriate medical records; and/or
  - f. appropriately review the Connecticut Prescription Monitoring and Reporting System.

11. On multiple occasions from approximately 2015 through May 2024, Respondent engaged in illegal, incompetent and/or negligent conduct in the practice of medicine with Patient #2 in one or more of the following ways, including, but not limited to, when he:
  - a. engaged in sexual contact with Patient #2 including during office visits;
  - b. caused Patient #2 to engage in sexual contact in exchange for prescriptions for medications including controlled substances;
  - c. caused Patient #2 to become dependent and/or addicted to opiates to satisfy his sexual needs; and/or
  - d. violated patient-health care provider boundaries with Patient #2, including, but not limited to, exchanging phone calls and/or text messages.
  
12. On multiple occasions from approximately November 13, 2023 through July 26, 2024, Respondent prescribed medications, including controlled substances for Patient #2 without clinical justification and/or when he was not her active health care provider. Respondent also prescribed said medications to cause Patient #2 to engage in sexual activities with him.
  
13. The above-described facts constitute grounds for disciplinary action pursuant to Connecticut General Statutes §20-13c, including, but not limited to:
  - a. §20-13c(4);
  - b. §20-13c(5);
  - c. §21a-254(j)(9); and/or,
  - d. §21a-252(a).

WHEREFORE, the Department prays:

The Connecticut Medical Examining Board, as authorized by Connecticut General Statutes §§20-13c and 19a-17, revoke or order other disciplinary action against Respondent's physician and surgeon license as it deems appropriate and consistent with law.

Dated August 27, 2024.



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Christian D. Andresen, MPH, Section Chief  
Practitioner Licensing & Investigations Section  
Healthcare Quality and Safety Branch