

**BEFORE THE INDIANA STATE
BOARD OF NURSING**

CAUSE NUMBER: 2012 NB 445

**IN THE MATTER OF THE LICENSE OF:)
MARY LOUISE PAULETICH, L.P.N.)
LICENSE NO: 27055128A (ACTIVE))**

FILED

OCT 10 2012

Indiana Professional
Licensing Agency

COMPLAINT

The State of Indiana ("Petitioner"), by counsel, Deputy Attorney General Patricia Gibson, on behalf of the Office of the Attorney General, and pursuant to Ind. Code § 25-1-7-7, Ind. Code ch. 25-1-5, Ind. Code § 25-23-1-7, the Administrative Orders and Procedures Act, Ind. Code ch. 4-21.5-3, and Ind. Code ch. 25-1-9, files its Complaint against the Indiana nursing license of Mary Louise Pauletich, L.P.N., ("Respondent"), and in support alleges and states the following:

FACTS

1. Respondent is a Licensed Practical Nurse ("LPN") in the State of Indiana having been issued license number 27055128A on January 21, 2005. Respondent's address on file with the Indiana Professional Licensing Agency is 438 Rose Avenue, New Haven, Indiana 46774.
2. On or about March 8, 2012, Respondent began employment as a LPN with Byron Health Center ("Byron"), located in Fort Wayne, Indiana.
3. On or about April 20, 2012, forty-five dollars (\$45.00) was discovered missing from a resident's medical cart.
4. On or about April 24, 2012, Respondent admitted to stealing the money to an Allen County Sheriff and stated that she would return the money to the resident.
5. On or about April 24, 2012, Respondent's employment with Byron was terminated.

COUNT I

6. Paragraphs 1-5 are incorporated by reference herein.

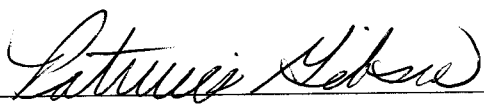
7. Respondent's conduct as described above constitutes a violation of Indiana Code § 25-1-9-4(a)(5) and 848 IAC 2-3-3(12) in that Respondent engaged in a course of immoral conduct in connection with the delivery of services to the public as evidenced by Respondent admitting she misappropriated money from a resident.

WHEREFORE, Petitioner demands an order against the Respondent that:

1. Imposes the appropriate disciplinary sanction;
2. Directs Respondent to immediately pay all costs incurred in the prosecution of this case; and;
3. Provides any further relief as the Board deems just and proper.

Respectfully submitted,

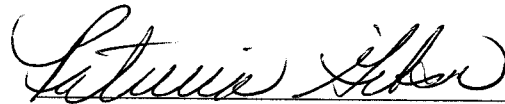
GREGORY F. ZOELLER
Attorney General of Indiana
Attorney Number: 1958-98

By: 
Patricia Gibson
Deputy Attorney General
Attorney Number: 12011-49

CERTIFICATE OF SERVICE

I certify that a copy of the "Complaint" has been duly served upon the Respondent listed below, by United States mail, first-class, postage prepaid, on this 10th day of October, 2012.

Mary Louise Pauletich, L.P.N.
438 Rose Avenue
New Haven, Indiana 46774

A handwritten signature in cursive script, appearing to read "Patricia Gibson", written over a horizontal line.

Patricia Gibson
Deputy Attorney General

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