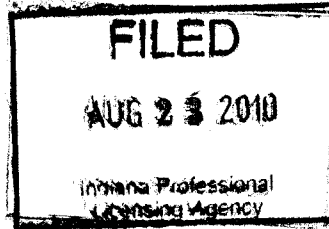


BEFORE THE INDIANA STATE
BOARD OF NURSING
CAUSE NUMBER: 2010 NB 191

IN THE MATTER OF THE LICENSE OF)
)
MARY ALICE REETER, L.P.N.,)
)
LICENSE NO: 27013792A)



COMPLAINT

This complaint is brought against the nursing license of Mary Alice Reeter, L.P.N., (Respondent), by the Office of the Attorney General, by counsel, Deputy Attorney General Thomas P. McGee on behalf of the State of Indiana (Petitioner) and pursuant to Ind. Code §25-1-7-7, Ind. Code §25-1-5-3, Ind. Code §25-23-1-7 et seq., the Administrative Orders and Procedures Act, Ind. Code §4-21.5-3 et seq. and Ind. Code §25-1-9-1 et seq. and in support alleges and states:

FACTS

1. Respondent's address on file with the Indiana Professional Licensing Agency is 7920 Goodway Drive, Indianapolis, IN 46256 and she is a Licensed Practical Nurse in the State of Indiana having been issued license number 27013792A in 1974. Respondent's license to practice medicine has been expired since 1984.

2. On or about August 29, 1989, Respondent began employment as a Teacher's Aid with Metropolitan School District of Lawrence Township (Metropolitan) in Indianapolis, Indiana.

3. On or about December 25, 1994, Respondent's employment status with Metropolitan was reclassified to Nurse.

4. On or about March 3, 1995, Respondent submitted an absence request from Metropolitan in order to attend a Township Nurses Meeting.

5. On or about March 17, 1995, Respondent submitted an absence request from Metropolitan in order to attend a Township Nurses Meeting.

6. On or about August 22, 2000, Respondent's employment status with Metropolitan was reclassified to Middle School Nurse.

7. According to Metropolitan's job description for the position of School Nurse, Respondent was required to have a degree as a Registered Nurse or as a Licensed Practical Nurse and maintain appropriate licensure. Under Responsibilities and Duties, Respondent was required to uphold the Nursing Standards of Care set forth by the Indian Board of Nursing; uphold and implement safe nursing practices set forth by the Indiana State Board of Nursing; dispense medications and health treatments; maintain appropriate school health records; provide first aid; provide education on health issues; assist with school health screenings; report any communicable diseases; and initiate referrals to appropriate health or social agencies.

8. On or about February 2, 2007, Respondent completed an Indiana Worker's Compensation First Report of Injury or Illness for another employee. On this form, Respondent described her current title as nurse.

9. On or about March 1, 2007, Respondent completed an Indiana Worker's Compensation First Report of Injury or Illness for another employee. On this form, Respondent described her current title as school nurse.

10. In October of 2008, Metropolitan conducted an audit of licensed personnel. During this audit, it was discovered that Respondent did not have a current LPN license. On or

about October 13, 2008, Metropolitan placed Respondent on administrative leave for the week of October 13, 2008.

11. At this time, Respondent enquired with the Board about renewing her license. She was told at that time that she would need to submit verification of active licensure in another state or attend a refresher course and appear before the Board.

12. On or about October 17, 2008, Respondent submitted notification of her retirement to Metropolitan. Respondent was allowed to retire at that time.

13. As of the date of the filing of this complaint, Respondent has not submitted a request for renewal with the Board since her license expired in 1984.

COUNT I

1. Respondent's conduct as described above constitutes a violation of Indiana Code § 25-1-9-4(a)(1)(B) in that Respondent engaged in fraud or material deception in the course of professional services or activities as evidenced by Respondent representing herself as a licensed practical nurse from 1995 through 2008 while practicing as a school nurse at Metropolitan.

2. Respondent's failure to comply with Indiana law is cause for disciplinary sanctions which may be imposed singly or in combination such as censure, a letter of reprimand, probation, suspension, or a revocation of license, and a fine up to the amount of \$1000.00 per violation, as detailed at Ind. Code §25-1-9-9.

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

By:



Thomas P. McGee
Deputy Attorney General
Attorney No.: 27247-49


OFFICE OF THE ATTORNEY GENERAL

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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 23rd day of August, 2010.

Mary Alice Reeter, L.P.N.
7920 Goodway Dr.
Indianapolis, IN 46256



Thomas P. McGee
Deputy Attorney General