

BEFORE THE INDIANA STATE
BOARD OF NURSING
CAUSE NUMBER 2012 NB 565

IN THE MATTER OF THE LICENSE OF)
)
CARLA MICHELLE SUTTON, R.N.)
)
LICENSE NO: 28197270 (Active))
)



COMPLAINT

This Complaint is brought against the Registered Nurse license of Carla Michelle Sutton, R.N. (“Respondent”), by the Office of the Attorney General, by counsel, Deputy Attorney General, Jason J. Gross 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 10133 Kings Table Drive, Indianapolis, Indiana 46164. Respondent is a Registered Nurse (“R.N.”) in the State of Indiana holding license number 28197270 (Active). Respondent’s license was issued on June 16, 2011, and expires on October 31, 2013.
2. Respondent is currently licensed to practice nursing in the State of Texas.
3. As of April 2009, Respondent had been employed as a R.N. with Medical City Dallas Hospital (“Medical City”) in Dallas, Texas for three (3) years and three (3) months.

4. On or about April 5, 2009, while employed as a neonatal nurse with Medical City, Respondent failed to accurately follow the physician's order to feed Patient A every four (4) hours. Respondent admitted to feeding the patient every three (3) hours.

5. On the same date, Respondent falsified her medical record of Patient A in that Respondent modified Respondent's charting to reflect that Respondent fed Patient A every four (4) hours when in fact that she had fed Patient A every three (3) hours.

6. On or about September 20, 2011, the Texas Board of Nursing ("Texas Board") found Respondent to be in violation of Section 301.452(b)(10)&(13), Texas Occupations Code, and 22 Tex. Admin. Code §§217.11(1)(A),(B),(C)&(D) and 217.12(1)(A),(1)(B),(1)(C),(6)(A)&(6)(H).

7. As a result of these violations, the Texas Board disciplined Respondent's license by ordering the sanction of remedial education and a fine.

8. On or about October 15, 2011, Respondent applied for a renewal of her nursing license in the State of Indiana. In doing so, Respondent failed to disclose the aforementioned discipline of her license that took place in the State of Texas.

COUNT I

9. Paragraphs 1 through 8 are repeated and incorporated herein.

10. Respondent's conduct as described above constitutes a violation of Ind. Code § 25-1-9-4(a)(7) in that Respondent has had disciplinary action taken against Respondent or Respondent's license to practice in any state or jurisdiction on grounds similar to those under this chapter, as evidenced by his being found in violation of multiple violations by the Texas Board.

COUNT II

11. Paragraphs 1 through 8 are repeated and incorporated herein.

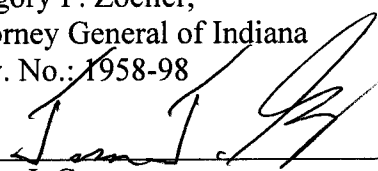
12. Respondent's conduct as described above constitutes a violation of Ind. Code § 25-1-9-4(a)(4)(B) in that Respondent has continued to practice although she was unfit to practice due to failure to keep abreast of current professional theory or practice, as evidenced by Respondent's failure to accurately follow a physician's orders with regard to Patient A or to keep accurate and honest records on Patient A.

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,

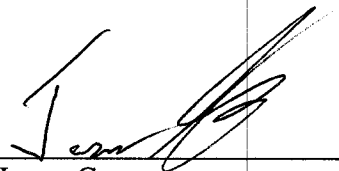
Gregory F. Zoeller,
Attorney General of Indiana
Atty. No.: 1958-98

By: 
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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 1st day of December 2012.

Carla Michelle Sutton, R.N.
10133 Kings Table Drive
Indianapolis, Indiana 46229



Jason Gross
Deputy Attorney General
Attorney No.: 23587-49