



State of Vermont
Office of the Secretary of State

Office of Professional Regulation
89 Main Street, 3rd Floor
Montpelier, VT 05620-3402
sos.vermont.gov

James C. Condos, Secretary of State
Christopher D. Winters, Deputy Secretary
S. Lauren Hibbert, Director

November 15, 2022

Tammy Larocque
57 Old Orchard Rd.
St. Albans, VT 05478-2053

Case: In Re: Tammy Larocque
Credential: License # 014.0001428
Docket No: 2022-5

Dear Ms. Larocque:

Enclosed please find a copy of the *Findings of Fact, Conclusions of Law, and Order* in the matter captioned above. This is a final administrative determination.

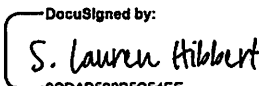
If you are aggrieved by this decision, you may begin the appeal process by filing a Notice of Appeal with the Office of Professional Regulation. **The notice must be received no later than 30 days from the decision's date of entry** (see last page of order). Send the appeal to:

Office of Professional Regulation
Attn: S. Lauren Hibbert, Director
89 Main Street, 3rd Floor
Montpelier, VT 05620-3402

The appeal does not stop the disciplinary action from going into effect. If you wish to have the disciplinary action stayed during the appeals process, you must specifically request a stay in writing. Your request for a stay will be considered, and a decision to grant or deny a stay will be issued. Please see the enclosed instructions.

If you have questions, please do not hesitate to contact the Office at (802) 828-2367.

Sincerely,

DocuSigned by:

S. Lauren Hibbert
Director

Enclosures: *Findings of Fact, Conclusions of Law, and Order*

cc: Michael Kupersmith, Esq., Hearing Officer
Rachel Heath, Esq., Prosecuting Attorney
Elizabeth Kneen, Case Manager
Tammy Larocque, Respondent, First Class Mail, Certified Mail & Email

**STATE OF VERMONT
SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION
BOARD OF DENTAL EXAMINERS**

**In re: Tammy M. Larocque
License No. 014.0001428**

Docket No. 2022-5

**FINAL ORDER
DECISION ON UNPROFESSIONAL CONDUCT**

Board of Dental Examiners

Robert Ruhl, Chair
David Baasch
Linda Greaves
Ellen Grimes
Mimi Kevan
William Koch
Toby Kravitz

Appearances

Rachel Heath, Prosecuting Attorney
Lucille Kelly, IT Member
Tammy Larocque, Respondent did not appear

Presiding Officer

Michael S. Kupersmith, Esq.

FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER

Introduction

This matter came before the Board of Dental Examiners on the Specification of Charges filed by the State on May 20, 2022. The hearing was held on November 9, 2022, and was conducted remotely pursuant to the Emergency Rules for Remote Hearings adopted by the Office of Professional Regulation (OPR). Rachel Heath, Esq., Prosecuting Attorney, appeared for the State. Respondent Tammy Larocque failed to appear either personally or through counsel.

Findings of Fact

1. Tammy M. Larocque ("Respondent") of St. Albans, Vermont is licensed by the State of Vermont as a Registered Traditional Dental Assistant ("RTDA")

under license number 014.0001428. This license was originally issued on March 31, 2017 and expires on September 30, 2023.

2. On October 19, 2020, the Board of Dental Examiners issued a Final Order indefinitely suspending Respondent's license after finding that Respondent had filled three or four prescriptions for Oxycodone that she knew had been forged. The Board found Respondent kept one or two pills for herself and then gave the remainder to the individual who had forged the prescriptions. See exhibit 1.
3. The Board determined Respondent violated the following statutes: (1) 3 V.S.A. § 129a(b) (Failure to conform to the essential standards of acceptable and prevailing practice); (2) 3 V.S.A. § 129a(a)(15) (Failing to exercise independent professional judgement in the performance of licensed activities when that judgement is necessary to avoid action repugnant to the obligations of the profession); (3) 26 V.S.A. § 584(3) (Promotion of the sale of drugs, devices, appliances, goods or services for a patient in a manner to exploit the patient for financial gain or selling, prescribing, giving away, or administering drugs or other than legal and legitimate therapeutic purposes); and (4) 3 V.S.A. § 129a(a)(7) (Willfully making or filing false reports or records in the practice of the profession; willfully impeding or obstructing the proper making or filing of reports or records or willfully failing to file the proper reports or records).
4. Under the October 2020 Order, before her license could be reinstated, Respondent was required to "submit a report from her treating therapist which must include a statement regarding Respondent's fitness to practice as a Registered Traditional Dental Assistant" and to submit three consecutive negative urinalyses.
5. On June 9, 2021, the Board accepted a Stipulation and Consent Order between the State and Respondent. Documented in the June 2021 Order are Respondent's negative urinalyses and the required treating therapist report. See exhibit 2.
6. The June 2021 Order conditioned Respondent's license, and Respondent agreed in paragraph seven of the June 2021 Order that the conditions were necessary to protect the public.
7. The conditions in the June 2021 Order required a minimum of 18 months of supervised practice, engaging in individual substance abuse and mental health counseling with a pre-approved counselor with monthly reports to the Case Manager, random drug and alcohol testing, abstaining from drug and alcohol use, submitting to the Case Manager a list of currently prescribed

- medications, notifying her employer and having them complete an employer agreement form, and having her employer complete monthly employer reports.
8. To date, the sole conditions with which Respondent has complied from the June 2021 Order are submitting monthly employer reports and submitting to the Case Manager of list of currently prescribed medications.
 9. Respondent is noncompliant with the remaining conditions of the June 2021 Order.
 10. To date, Respondent failed to submit to the Case Manager information necessary to approve a substance abuse and mental health counselor. In fact, Respondent has not provided any documentation to verify that she has engaged in any kind of substance abuse counseling or treatment.
 11. Respondent failed to enroll in random drug and alcohol testing until August 30 2021, even though the Order was entered on June 9, 2021.
 12. Between August 30, 2021 when Respondent enrolled in random drug and alcohol testing and February 28, 2022, she has failed to call in on 26 dates to determine whether she was selected for random testing on those dates. See exhibit 3.
 13. In addition, Respondent has failed to submit to any random alcohol and drug tests as the June 2021 Order required and to which Respondent stipulated. Respondent failed to submit to testing on multiple dates, including September 15, 2021, October 20, 2021, November 1, 2021, November 19, 2021, December 29, 2021, January 6, 2022, January 26, 2022, and February 15, 2022. See exhibit 3.

Conclusions of Law

In its Specification of Charges, the State alleged two violations of Vermont law: (1) Failing to comply with an order of the board or violating any term or condition of a license restricted by the board (3 V.S.A. § 129a(a)(4)); and (2) engaging in conduct of a character likely to deceive, defraud, or harm the public (3 V.S.A. § 129a(a)(28).

The Board concludes that the State has proved by a preponderance of the evidence that the Respondent committed the two violations alleged. The evidence showed that the Respondent failed to comply with the Board's order of June 9, 2021 in multiple ways: she failed to obtain an approved drug abuse and alcohol counselor; she failed to submit documentation of substance abuse counseling or treatment; she

delayed enrollment in the prescribed random drug and alcohol testing program for over two and one-half months after the entry of the order; she failed to check in for random drug and alcohol screens 26 times between September 1, 2021 and February 28, 2022; and she failed to submit to testing when required on eight occasions.

In the June 2021 Stipulation and Consent Order, Respondent agreed that, "the conditions set out in the Consent Order are appropriate and necessary to protect the public." Exhibit 2, page 2, paragraph 7. The conditions set forth in the June 2021 were designed to ensure that the Respondent would be alcohol- and drug-free, particularly in the course of her employment.

Paragraph 6 of the Order of June 2021 (page 4 of exhibit 2) provides:

Random Drug and Alcohol Testing. Respondent shall submit to random drug and alcohol testing through the designated entity. All testing shall be done on a random, unannounced basis and analyzed by a lab qualified to analyze samples for forensic purposes. All specimens collected for tests shall be collected in an observed setting. All test results shall be negative.

Failure to appear for, refusal to provide, adulteration of, dilution of, or tampering with a sample for any test shall cause that test result to be presumed positive. Any positive test result shall constitute a violation of this Order. Failure to check-in to determine whether Respondent is selected for testing on any given day, regardless of whether

Respondent is actually selected that day, may be considered a violation of this Order.

(Emphasis added.)

For purposes of this Order, the Board presumes that the Respondent would have tested positive for regulated drugs had she appeared for testing on the eight dates she missed. The Board is particularly concerned because there is no evidence that Respondent has engaged in substance-abuse counseling or treatment. Public health and safety demand that a Registered Traditional Dental Assistant not be impaired by regulated drugs in the course of her duties. The Board must act to protect the public from exposure to the danger posed by the Respondent.

Order

Based upon the Findings of Fact and Conclusions of Law set forth above, it is hereby ORDERED:

1. The Respondent's license is **SUSPENDED INDEFINITELY**. The Respondent may petition for reinstatement when she meets the following

conditions: No sooner than forty-five (45) days prior to requesting reinstatement, Respondent must, at her own cost:

- a. Obtain an independent evaluation report by a pre-approved licensed professional specializing in substance abuse treatment ("Independent Evaluator") who has verified receipt and review of the Board's Order, Specification of Charges, and Summary Suspension Order in the above-referenced docket number. The Enforcement Unit Case Manager must pre-approve the independent evaluator. The results of the Independent Evaluation must indicate that Respondent does not present a risk to the safety, health or welfare of Respondent's potential patients. The evaluation shall meet all Independent Evaluation Requirements and shall include any recommendations that would ensure Respondent is safe to practice. The evaluation must be submitted to the Enforcement Unit Case Manager.**
- b. Submit to the Enforcement Unit Case Manager the results of a minimum of three (3) random drug and alcohol tests:**
 - i. When Respondent is ready to petition for reinstatement, Respondent shall contact the Enforcement Unit Case Manager to set-up the drug and alcohol testing process and receive instructions. Once registered with the pre-approved person or entity, Respondent will have 45 days to submit a minimum of three (3) random drug and alcohol tests. The process by which Respondent learns whether she is selected to submit to a test on any given day will be governed by the policy of the pre-approved person or entity conducting the testing at that time.**
 - ii. The drug and alcohol tests must be collected in an observed setting; administered by a pre-approved person or entity; and analyzed by a pre-approved lab qualified to analyze samples for forensic purposes, the results of which shall be negative.**
 - iii. Failure to appear for, refusal to provide, adulteration of, dilution of, or tampering with a sample for any test in anyway shall cause that test to be presumed positive; and**
- c. If the Independent Evaluator recommends, Respondent must enter into a treating professional agreement and substance abuse treatment plan with a pre-approved treating professional(s) and follow all recommendations. If treatment is recommended, Respondent must submit a treating professional agreement to the**

Enforcement Unit Case Manager before a reinstatement request will be considered.

- d. If reinstated, Respondent's license **SHALL BE CONDITIONED** pursuant to the original terms of the June 2021 Stipulation and Consent Order and whatever terms are reasonable at the time of Respondent's reinstatement request to ensure compliance, taking into account the independent evaluation, drug screen results, the final Order in docket 2022-5, and any other relevant factors at that time.


Board of Dental Examiners
By: Robert Ruhl, Chair

11/10/22
Date

Date of Entry 11/15/22

APPEAL RIGHTS

This is a final administrative determination by the Board of Dental Examiners. A party aggrieved by a final decision by the Board may appeal this decision by filing a written Notice of Appeal with the Director of the Office of Professional Regulation, 89 Main Street, 3rd floor, Montpelier, VT 05620-3402, within 30 days of the date of entry of this order. If an appeal is filed, the Director of the Office of Professional Regulation shall assign the case to an Appellate Officer. The appeal shall be conducted based on the record created before the Board. In cases of alleged irregularities in procedure before the Board not shown on the record, proof of that issue may be taken by the Appellate Officer. 3 V.S.A. §§ 129(d) and 130a. A stay of this Order may also be requested.

Office of Professional Regulation
Answer

Case Name: <u>Tammy Larocque</u>	Docket Number: <u>2022-5</u>
Your Name: <u>Tammy Larocque</u> (person completing the form B either the respondent or the respondent's attorney)	
Telephone: (daytime) <u>802 393-0349</u>	E-mail <u>Tlarocque1969@gmail</u>

Attach Additional Sheets As Needed

1. Undisputed Facts: State all material facts in the charges that you do not dispute. You may use the paragraph numbers from the specification of charges rather than repeating each statement.

1-9 These are undisputed facts.

2. Disputed Issues of Fact: State all material facts that you contend are disputed. You may use the paragraph numbers from the specification of charges rather than repeating each statement.

#12, 13, 14, 17-20 22-24

- OVER -



RECEIVED
JUN 08 2022
Secretary of State
Professional Regulation

RECEIVED

JUN 08 2022

Secretary of State
Professional Regulation

3. Legal Defenses: List all defenses that you intend to present to the charges.

I did go to counseling from Jan 2019 - ~~Feb~~

Howard Center, St. Albans VT,

I have requested My Records and waiting for Them,
as they said it could take up to 30 days. June 6, 2022.
and will submit as soon as I receive them.

I made a mistake going through FSSolutions for
my Alcohol & Drug Testing. How ever Every Email that
I received by them, to be tested, I did go to Aversy Health
for my UA's. Not realizing it wasn't FSSolutions. I am Enclosing
The Appt dates that I did go. These should line up with
The dates I was scheduled for FSSolutions. Also 1 ~~UA~~ UA
Result that Aversys has given me. They say I can't get
The others because they bought out Aversy Health, and
can't provide the other Test results. I am going next Monday
for Intake to go back to my original Counselor for
Drug & Alcohol Counseling.

4. Sign and Date: By signing, I affirm that all pages of this form are complete and truthful.

I ☒ have ☐ have not attached additional information.

Harroque
Signature

6.6.2022
Date

Please mail the original to:

Vermont Secretary of State
Office of Professional Regulation
Attn: Docket Clerk
89 Main Street, 3rd Floor
Montpelier, VT 05620-3402

You must also send a copy to:

Prosecuting Attorney who charged the case
89 Main Street, 3rd Floor
Montpelier, VT 05620-3402



Account: Private Pay
Program: Private Pay
Patient Name: Tammy Larocque
PIN: 2526497
Accession #: 17912920-019
Accession Group #: 17912920-UR
Patient ID 2: N/A
Patient ID 3: N/A
Patient ID 4: N/A
Case Worker:
Collected By: Kate Greenwood
Order Type: Random

Results: Negative
Panel Name: Opiate 300
Scheduled Date: 02/22/2022
Collection Date: 02/22/2022 17:37
Collection Location: St. Albans, VT
Date Received: 02/24/2022 13:09
Date Reported: 02/24/2022 17:10
Confirmation Order: N/A
Confirmation Reported: N/A
Billed Insurance: N
Customer Order ID: N/A

Test Class	Assay / Analyte	Result	Level	Cut-Off	ULOL	Sample Type	Testing Method
Opiates	Opiate 300	Negative	0 ng/ml	300 ng/ml	1000 ng/ml	Urine	Immunoassay
Validity	Creatinine	Normal	176 mg/dL	20 mg/dL	400 mg/dL	Urine	Immunoassay

Notes:

- 1. Upper Limit of Linearity (ULOL)** - Numeric values above the upper limit of quantitation are not reported. If the amount reported is the same as the upper limit of quantitation, the concentration in the sample is at or above this level.
- 2. averhealth Collections Statement** - Sample collected met all requirements for proper temperature and other possible adulteration indicators.
- 3. Frozen Storage** - Non-negative samples will be sealed in the original container, properly marked for identification, and locked in frozen storage for 30 days from the date of collection.
- 4. Testing Performed by** - Avertest, LLC d/b/a averhealth, 4709 La Guardia Drive St. Louis, MO; 63134
- 5.** This collection was Observed

Certification Statement:

I certify I am employed by averhealth as a laboratory technician and performed the analysis and data review of the specimen contained in this report. My education, training and experience qualify me to perform the tests and certify the results. Immunoassay testing was performed to screen the specimen for the absence or presence of a substance. A laboratory immunoassay test uses antibodies to detect the presence of drugs and other substances or specimens. This technique is the most widely used method of laboratory testing throughout the world and is the most accurate screening test for this particular drug. Operating procedures and protocols established by the Clinical Laboratory Improvement Amendments were followed during the testing process and I certify that the test results are reliable and accurate. I acknowledge that submission of false information may subject me to prosecution for the criminal offence of perjury. Laboratory confirmation testing via LC-MS/MS or a comparable testing method should be completed on any positive results prior to taking judicial, employment, or similar action.

Certifying Technician: Shannon Spencer

Visit	Appt Date	Appt Time	Column	Status/ Action	User	Reason/ Appt Type	Change Date	Change Time
+ 2538589	01/06/2022	03:15 PM	ST ALBANS FEMALE (	COMPLETE	KAITLIN	WISP	01/06/2022	03:25 PM
+ 2536965	12/30/2021	04:30 PM	ST ALBANS FEMALE (	COMPLETE	KAITLIN	WISP	12/30/2021	04:37 PM
+ 2536734	12/29/2021	12:15 PM	ST ALBANS FEMALE (	COMPLETE	KATE	SHY BLADDER	12/29/2021	01:08 PM
+ 2529220	11/19/2021	04:00 PM	ST ALBANS FEMALE (	COMPLETE	KAITLIN	NO CUSTOM ORDER	11/19/2021	04:11 PM
+ 2524912	11/01/2021	05:15 PM	ST ALBANS FEMALE (	COMPLETE	KATE	NO CUSTOM ORDER	11/01/2021	05:24 PM
+ 2522289	10/20/2021	12:15 PM	ST ALBANS FEMALE (	COMPLETE	LEIGH	NEW PATIENT SCHEDULE	10/20/2021	12:36 PM

Visit	Appt Date	Appt Time	Column	Status/Action	User	Reason/ Appt Type	Change Date	Change Time
+	2549143	02/22/2022	05:30 PM	ST ALBANS FEMALE (COMPLETE	KATE	WISP	02/22/2022	05:50 PM
+	2543419	01/26/2022	12:30 PM	ST ALBANS FEMALE (DELETED	KATE		01/26/2022	12:17 PM
+	2538589	01/06/2022	03:15 PM	ST ALBANS FEMALE (COMPLETE	KAITLIN	WISP	01/06/2022	03:25 PM
+	2536965	12/30/2021	04:30 PM	ST ALBANS FEMALE (COMPLETE	KAITLIN	WISP	12/30/2021	04:37 PM
+	2536734	12/29/2021	12:15 PM	ST ALBANS FEMALE (COMPLETE	KATE	SHY BLADDER	12/29/2021	01:08 PM
+	2529220	11/19/2021	04:00 PM	ST ALBANS FEMALE (COMPLETE	KAITLIN	NO CUSTOM ORDER	11/19/2021	04:11 PM

RECEIVED

JUN 08 2022

**Secretary of State
Professional Regulation**

**STATE OF VERMONT
SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION
BOARD OF DENTAL EXAMINERS**

IN RE:)
Tammy M. Larocque) **Docket No. 2022- 5**
License No. 014.0001428)

SPECIFICATION OF CHARGES

NOW COMES the State of Vermont and hereby requests the following charges Respondent Tammy M. Larocque as follows:

Board Authority

1. The Vermont State Board of Dental Examiners (the “Board”) has jurisdiction to investigate and adjudicate allegations of unprofessional conduct committed by dentists, dental hygienists, and dental assistants pursuant to 3 V.S.A. §§129, 129a; 26 V.S.A. Chapter 12; the Administrative Rules of the Board of Dental Examiners (“ARBDE”); and the Rules of the Office of Professional Regulation (“OPR”).

Statement of Facts

2. Tammy M. Larocque (“Respondent”) of St. Albans, Vermont is licensed by the State of Vermont as a Registered Traditional Dental Assistant (“RTDA”) under license number 014.0001428. This license was originally issued on March 31, 2017 and expires on September 30, 2023.
3. On October 19, 2020, the Board of Dental Examiners issued a Final Order (“October 2020 Order”) indefinitely suspending Respondent’s license after finding that Respondent had filled three or four prescriptions for Oxycodone that she knew had been forged. The Board found Respondent kept one or two pills for herself and then gave the remainder to the individual who had forged the prescriptions.
4. The Board determined Respondent violated 3 V.S.A. § 129a(b) (Failure to conform to the essential standards of acceptable and prevailing practice), 3 V.S.A. § 129a(a)(15) (Failing to exercise independent professional judgement in the performance of licensed activities when that judgement is necessary to avoid action repugnant to the obligations of the profession), 26 V.S.A. § 584(3) (Promotion of the sale of drugs, devices, appliances, goods or services for a patient in a manner to exploit the patient for financial gain or selling, prescribing, giving away, or administering drugs or other than legal and legitimate therapeutic purposes), and 3 V.S.A. § 129a(a)(7) (Willfully making of filing false reports or records in the practice of the profession; willfully impeding or obstructing the proper making or filing of reports or records or willfully failing to file the proper reports or records).

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
89 Main Street
3rd Floor
Montpelier, VT
05620-3402

5. Under the October 2020 Order, before her license could be reinstated, Respondent was required to “submit a report from her treating therapist which must include a statement regarding Respondent’s fitness to practice as a Registered Traditional Dental Assistant” and to submit three consecutive negative urinalyses.
6. On June 9, 2021, the Board accepted a Stipulation and Consent Order (“June 2021 Order”) between the State and Respondent. Documented in the June 2021 Order are Respondent’s negative urinalyses and the required treating therapist report.
7. The June 2021 Order conditioned Respondent’s license, and Respondent agreed in paragraph seven of the June 2021 Order that the conditions were necessary to protect the public.
8. The conditions in the June 2021 Order required a minimum of 18 months of supervised practice, engaging in individual substance abuse and mental health counseling with a pre-approved counselor with monthly reports to the Case Manager, random drug and alcohol testing, abstaining from drug and alcohol use, submitting to the Case Manager a list of currently prescribed medications, notifying her employer and having them complete an employer agreement form, and having her employer complete monthly employer reports.
9. To date, the only conditions Respondent has complied with are submitting monthly employer reports and submitting to the Case Manager a list of currently prescribed medications.
10. Respondent is noncompliant with the remaining conditions of the June 2021 Order.
11. To date, Respondent has failed to submit to the Case Manager information necessary to approve a substance abuse and mental health counselor. In fact, Respondent has not provided any documentation to verify that she has engaged in any kind of substance abuse counseling or treatment.
12. Respondent failed to enroll in random drug and alcohol testing until August 2021, even though the Order was entered on June 9, 2021.
13. Since Respondent enrolled in random drug and alcohol testing in August 2021, she has failed to call in on at least 26 dates to determine whether she was selected for random testing on those dates.
14. In addition, Respondent has failed to submit to any random alcohol and drug tests as the June 2021 Order required, and to which Respondent stipulated. Respondent failed to submit to testing on at least ten different dates.
15. The State filed a request for Summary Suspension in this matter on February 4, 2022. A hearing was held on March 9, 2022 and the Board entered an Order of Summary Suspension on March 14, 2022.

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
89 Main Street
3rd Floor
Montpelier, VT
05620-3402

16. Until her license was summarily suspended, Respondent was employed as an RTDA in St. Albans, Vermont.

Violation One: 3 V.S.A. § 129a(a)(4) Failing to comply with an order of the board or violating any term or condition of a license restricted by the board.

17. The State re-alleges and incorporates paragraphs 2 through 16 above.
18. As a licensed RTDA, Respondent is required to comply with any orders issued against her license.
19. Paragraphs 2 through 16 demonstrate Respondent failed to comply with an order requiring her to undergo substance use treatment and random drug and alcohol testing after her license had previously been suspended.
20. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because the Respondent has committed unprofessional conduct in violation of 3 V.S.A. § 129a(a)(4).

Violation Two: 3 V.S.A. § 129a(a)(28) Engaging in conduct of a character likely to deceive, defraud, or harm the public.

21. The State re-alleges and incorporates Paragraphs 2 through 16 above.
22. Under the June 2021 Order, Respondent is required to engage in drug treatment and random testing as conditions that are necessary to protect the public.
23. Respondent has failed to engage in the measures the Board determined are necessary to protect the public, including but not limited to random drug/alcohol testing and substance use treatment.
24. Paragraphs 2 through 16 above demonstrate that by failing to comply with the Board ordered conditions to protect the public, Respondent is engaging in conduct of a character likely to deceive, defraud or harm the public
25. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because the Respondent has committed unprofessional conduct in violation of 3 V.S.A. § 129a(a)(28).

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
89 Main Street
3rd Floor
Montpelier, VT
05620-3402

(Intentionally Left Blank)

Relief Requested

WHEREFORE, the State of Vermont respectfully requests that the Board warn, reprimand, suspend, revoke, limit, condition, or otherwise discipline Tammy Larocque's RTDA license.

DATED at Vermont this 20th day of May 2022.

STATE OF VERMONT
SECRETARY OF STATE

By: /s/ Rachel Heath
Rachel Heath
Prosecuting Attorney
(802)828-0041
Rachel.heath@vermont.gov

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
89 Main Street
3rd Floor
Montpelier, VT
05620-3402