

**STATE OF VERMONT
SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION
BOARD OF NURSING**

IN RE:

**ROBERT KUYON
License No. 026.0145746**

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Docket No. 2023-2

ORDER TO REMOVE CONDITIONS

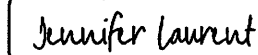
On the 11 day of September, 2023, the Vermont Board of Nursing considered Robert Kuyon's request for Removal of Conditions imposed pursuant to a Stipulation & Proposed Order under Docket Number 2023-2. Mr. Kuyon has completed the required coursework, and he has provided proof of the same to his case manager. After review of the compliance file, the State does not object to the requested removal of these conditions.

WHEREFORE, the Board hereby removes all conditions that currently restrict Robert Kuyon's RN license, and/or his ability to reinstate that license.

DATED at Burlington, Vermont, this 11th day of September, 2023.

VERMONT BOARD OF NURSING

DocuSigned by:



By: Jennifer Laurent, Chair

Date of Entry: 9/18/2023



**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**

**Sarah Copeland Hanzas, Secretary of State
S. Lauren Hibbert, Deputy Secretary
Kevin Rushing, Director**

August 25, 2023

**George Hasselback, Esq.
Office of Professional Regulation
89 Main Street, 3rd Floor
Montpelier, VT 05620-3402**

**Case: Robert Kuyon
Credential: License # 026.0145746
Docket No: 2023-2**

Dear Attorney Hasselback:

Please find the enclosed Request to filed on the above captioned docket number. Pursuant to the Office of Professional Regulation's Administrative Rule 3.8 you have 10 days to respond to the motion. I understand that this request is Unopposed but an Order to Remove Conditions will be needed to present to the Board of Nursing.

You may contact me at (802) 828-2367 if you have any questions.

Sincerely,

**/s/ Julie Bowen
Docket Clerk**

Enc: *Request to Remove Conditions*

**Cc: Kristin Donnelly, Case Manager
Mark Oettinger, Esq., Respondent's Attorney**

**STATE OF VERMONT
SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION
BOARD OF NURSING**

IN RE:

**ROBERT KUYON
License No. 026.0145746**

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Docket No. 2023-2

UNOPPOSED PETITION FOR REMOVAL OF CONDITIONS

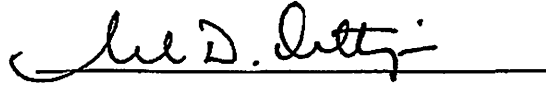
NOW COMES Respondent, Robert Kuyon, and hereby respectfully requests that the conditions on his above-captioned nursing license be removed. In support of his Petition, Respondent states as follows:

1. On June 29, 2023, Respondent and his undersigned counsel executed a Stipulation and Proposed Order which was also executed by the State of Vermont, per Prosecuting Attorney George Lloyd Hasselback, on July 5, 2023. The Board of Nursing, per Board Chair Jennifer Laurent, approved the Stipulation and implemented the Order on July 17, 2023;
2. Paragraph B(3) of Order included a condition that Respondent complete a course in ethical practices approved by his case manager;
3. Respondent has completed the required course in ethical practices, and has provided proof of the same to his case manager; and
4. Mr. Hasselback does not object to the granting of this Petition.

WHEREFORE Respondent requests that his license be issued and/or re-issued without conditions.

DATED at Burlington, Vermont, this 23rd day of August, 2023.

ROBERT KUYON

A handwritten signature in black ink, appearing to read "Mark D. Oettinger", is written over a horizontal line.

By: Mark D. Oettinger, Esq.

Montroll, Oettinger & Barquist, P. C.

Attorneys for Respondent

126 College Street, Suite 400

P. O. Box 1045

Burlington, VT 05402

(802) 540-0250

moettinger@mblawoffice.com



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

Sarah Copeland Hanzas, Secretary of State
S. Lauren Hibbert, Deputy Secretary
Kevin A. Rushing, Director

July 17, 2023

Attorney Mark Oettinger
P.O. Box 1045
Burlington, VT 05402

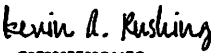
CASE: Robert Kuyon
Docket No.: 026.0145746

Dear Attorney Oettinger:

Enclosed please find a copy of the approved *Stipulation and Consent Order*

For questions about complying with this Order, please contact the Case Manager at 802-828-2875

Sincerely,

DocuSigned by:

E0F2237E33C44EC...
Kevin A. Rushing
Director

Enc: *Stipulation and Consent Order*

cc: George Hasselback, Esq., Prosecuting Attorney
Kristin Donnelly, Case Manager
Mark Oettinger, Esq., Respondent's Attorney, First Class Mail & Email

**STATE OF VERMONT
SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION
BOARD OF NURSING**

IN RE:)
Robert Kuyon) **Docket No. 2023-2**
License No. 026.0145746)

STIPULATION AND PROPOSED ORDER

The matter captioned above arises from a complaint made to the Office of Professional Regulation. The parties to the case hereby agree to an expedited resolution of the matter as follows:

Stipulated Facts and Violations

1. Robert Kuyon ("Respondent") of Parker, Colorado was licensed by the State of Vermont as a Registered Nurse ("RN") under license number 026.0145746. This license was originally issued on May 10, 2021 and expired on March 31, 2023.
2. Respondent was also licensed as an RN by the State of Colorado under license number 85835. This license was issued on April 16, 2008 and was, at all times relevant to this matter, valid and unexpired.
3. On or about March 9, 2021, a former employer of Respondent filed a complaint with the Colorado State Board of Nursing ("CO BON"), in which it alleged that Respondent had engaged in unprofessional conduct.
4. The allegations contained in the complaint were investigated at the request of the CO BON.
5. On or about April 19, 2021, Respondent responded to the allegations contained in the complaint through legal counsel retained to represent him in matters pertaining to the allegations contained in the complaint.
6. On or about May 10, 2021, Respondent applied for initial licensure as an RN in Vermont via the online application portal set up for this purpose.
7. As part of the process of applying for licensure in Vermont as an RN, Respondent was asked, "Are you currently under investigation by a licensing authority in Vermont or any other state, federal authority or other jurisdiction (US or elsewhere)?"
8. Respondent answered "no" to this question.
9. This statement was false because Respondent was being investigated by the CO BON at that time.

STATE OF VERMONT



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

Violation One: 26 V.S.A. § 1582(a)(1) Making or causing to be made a false, fraudulent, or forged statement or representation in procuring or attempting to procure registration or renew a license.

10. The State re-alleges and incorporates Paragraphs 1 through 9 above.
11. Vermont law prohibits making or causing to be made a false, fraudulent, or forged statement or representation in procuring or attempting to procure registration or renew a license.
12. Paragraphs 1 through 9 above demonstrate that when Respondent applied for a Vermont RN license on May 10, 2021, he was asked if he was currently under investigation by a licensing authority in Vermont or any other state, federal authority or other jurisdiction (US or elsewhere), and answered "no," despite at that time being under investigation by the CO BN for allegations of unprofessional conduct related to practicing as a licensed RN.
13. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent committed unprofessional conduct in violation of 26 V.S.A. §1582(a)(1).

Understandings

14. This Stipulation is neither an admission of facts by Respondent nor a concession by the State of Vermont that its charges are not well-founded. To avoid delay, uncertainty, inconvenience, and the expense of protracted litigation, the parties enter this full and final Stipulation pursuant to these Understandings and the Order below. Respondent does not contest that the State has evidence which, if believed by the fact finder, may establish by a preponderance of the evidence that he engaged in the alleged misconduct.
15. Respondent understands that the Board must review and accept the terms of the Consent Order. If the Board rejects any portion, the entire Stipulation and Consent Order shall be null and void.
16. Respondent specifically waives any claims that any disclosures made to the full Board during its review of this agreement have prejudiced Respondent's rights to a fair and impartial hearing if this agreement is not accepted by the Board and proceeds to a contested hearing.
17. Respondent has read and reviewed this entire document and agrees that it contains the entire agreement between the parties.
18. Respondent is not under the influence of any drugs or alcohol at the time Respondent signs this Stipulation and Consent Order.

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05620-3402

19. Respondent voluntarily enters into this agreement after the opportunity to consult with legal counsel and is not being coerced by anyone into signing this Stipulation and Consent Order.
20. Respondent voluntarily waives Respondent's right to a contested hearing before the Board and waives any right to appeal from this Stipulation and Consent Order.
21. Respondent agrees that the Order set forth below may be entered by the Board.

ORDER

Based on the Stipulation above, it is **ORDERED AND ADJUDGED** as follows:

- A. Respondent's license is hereby **REPRIMANDED**.
- B. Respondent's license is hereby **CONDITIONED** commencing with the date of entry of this Stipulation and Consent Order:
 1. **Re-issuance of License:** Upon the commencement of these conditions, Respondent shall be issued a license labeled "conditioned."
 2. **License Renewal:** This Order does not automatically extend the license and Respondent must comply with the requirements for license renewal.
 3. **Required Coursework:** Respondent shall, at her own expense and within ninety (90) days of the date of entry of this Stipulation and Consent Order, satisfactorily complete a course in ethical practices for health-care professionals that is approved by the Case Manager.

*Respondent must provide satisfactorily completed workbooks and certificates of completion to the Case Manager.

**Coursework may not be counted toward any continuing education requirement of licensure.
- C. Upon compliance with and completion of all required conditions, Respondent must petition to remove any or all conditions from the license and demonstrate full compliance with the Order. The conditions shall remain in place until Respondent has completed all conditions ordered.
- D. Notwithstanding any provision above, Respondent must continue to meet all requirements to maintain licensure, for license renewal, and for license reinstatement.
- E. This Stipulation and Consent Order is a matter of public record and may be reported to other licensing authorities as provided in 3 V.S.A. § 129(a).
- F. This Stipulation and Consent Order will remain part of Respondent's licensing file and may be considered relative to any future disciplinary matter.

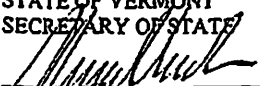
STATE OF VERMONT



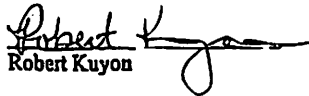
Prosecuting Attorney
Office of
Professional Regulation
39 Main Street
3rd Floor
Montpelier, VT
05620-3402

AGREED TO:

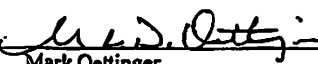
Dated: 7/5/2023

By: 
STATE OF VERMONT
SECRETARY OF STATE
George Lloyd Hasselback
Prosecuting Attorney
(802) 828-0350
george.hasselback@vermont.gov

Dated: 6/29/23

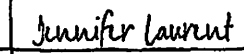
By: 
RESPONDENT
Robert Kuyon

Dated: 6/29/23

By: 
COUNSEL FOR RESPONDENT
Mark Oettinger

APPROVED AND SO ORDERED:

Dated: _____

By: 
DocuSigned by:
Jennifer Laurent
Board Chairperson

Date of Entry: 7/17/23

STATE OF VERMONT



Prosecuting Attorney
Office of
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89 Main Street
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State of Vermont
Office of the Secretary of State
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89 Main Street, 3rd Floor
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Sarah Copeland Hanzas, Secretary of State
S. Lauren Hibbert, Deputy Secretary
Kevin A. Rushing, Director

June 20, 2023

Attorney Mark Oettinger
P.O. Box 1045
Burlington, VT 05402

Case: RE: Robert Kuyon
Credential: License # 026.0145746
Docket No: 2023-2

**NOTICE OF AMENDED SPECIFICATION OF
CHARGES**

The State Prosecuting Attorney has filed the enclosed *Amended Specification of Charges* and has asked the Office of Professional Regulation to take disciplinary action against your license.

You or your attorney must file a written Answer to the charges within 20 days of the date of this notice. Enclosed is an Answer form as a suggested format for your response to the charges. Return your Answer to the Docket Clerk and Prosecuting Attorney at the addresses listed on the Answer form. Once your Answer has been received, a hearing will be scheduled.

If you fail to answer the charges within 20 days, disciplinary action may be taken against your license by default and without your input. The *Administrative Rules for the Office of Professional Regulation* are available online at <https://sos.vermont.gov/opr/>.

If you have an attorney who has filed a Notice of Appearance with this office, we will continue to send copies of all correspondence to both you and your attorney unless directed otherwise.

Sincerely,

/s/Julie Bowen
Docket Clerk

Enclosures: *Amended Specification of Charges*

cc:

George Hasselback, Esq., Prosecuting Attorney
Kristin Donnelly, Case Manager
Mark Oettinger, Esq., Respondent's Attorney, First Class Mail & Email

**STATE OF VERMONT
SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION
BOARD OF NURSING**

IN RE:)
Robert Kuyon) **Docket No. 2023-2**
License No. 026.0145746)

AMENDED SPECIFICATION OF CHARGES

NOW COMES the State of Vermont and hereby makes the following charges
against Respondent Robert Kuyon:

Board Authority

1. The Vermont State Board of Nursing (the "Board") has authority to issue warnings or reprimands; suspend, revoke, limit, or condition current licenses; or prevent the renewal of lapsed licenses if, after disciplinary hearing, the Board finds that the Respondent has engaged in unprofessional conduct. 3 V.S.A. § 129(a); 3 V.S.A. § 129a; 3 V.S.A. § 814(d); 26 V.S.A. Chapter 28; the Administrative Rules of the Board of Nursing (the "ARBN"); and the Rules of the Office of Professional Regulation ("OPR").

Statement of Facts

2. Robert Kuyon ("Respondent") of Parker, Colorado was licensed by the State of Vermont as a Registered Nurse ("RN") under license number 026.0145746. This license was originally issued on May 10, 2021 and expired on March 31, 2023.
3. Respondent was also licensed as an RN by the State of Colorado under license number 85835. This license was issued on April 16, 2008 and was, at all times relevant to this matter, valid and unexpired.
4. On or about March 9, 2021, a former employer of Respondent filed a complaint with the Colorado State Board of Nursing ("CO BON"), in which it alleged that Respondent had engaged in unprofessional conduct.
5. The allegations contained in the complaint were investigated at the request of the CO BON.
6. On or about April 19, 2021, Respondent responded to the allegations contained in the complaint through legal counsel retained to represent him in matters pertaining to the allegations contained in the complaint.
7. On or about May 10, 2021, Respondent applied for initial licensure as an RN in Vermont via the online application portal set up for this purpose.

STATE OF VERMONT



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

8. As part of the process of applying for licensure in Vermont as an RN, Respondent was asked, "Are you currently under investigation by a licensing authority in Vermont or any other state, federal authority or other jurisdiction (US or elsewhere)?"
9. Respondent answered "no" to this question.
10. This statement was false because Respondent was being investigated by the CO BON at that time.

Violation One: 26 V.S.A. § 1582(a)(1) Making or causing to be made a false, fraudulent, or forged statement or representation in procuring or attempting to procure registration or renew a license.
11. The State re-alleges and incorporates Paragraphs 2 through 10 above.
12. Vermont law prohibits making or causing to be made a false, fraudulent, or forged statement or representation in procuring or attempting to procure registration or renew a license.
13. Paragraphs 2 through 10 above demonstrate that when Respondent applied for a Vermont RN license on May 10, 2021, he was asked if he was currently under investigation by a licensing authority in Vermont or any other state, federal authority or other jurisdiction (US or elsewhere), and answered "no," despite at that time being under investigation by the CO BN for allegations of unprofessional conduct related to practicing as a licensed RN.
14. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent committed unprofessional conduct in violation of 26 V.S.A. §1582(a)(1).

Relief Requested

WHEREFORE, the license of Robert Kuyon should be revoked, suspended, reprimanded, conditioned, or otherwise disciplined.

DATED at Vermont, this 6 day of June 2023.

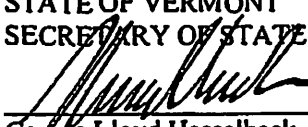
STATE OF VERMONT



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STATE OF VERMONT
SECRETARY OF STATE

By:


George Lloyd Hasselback
Prosecuting Attorney
(802) 828-0350
george.hasselback@vermont.gov

**STATE OF VERMONT
SECRETARY OF STATE
OFFICE OF PROFESSIONAL REGULATION
BOARD OF NURSING**

IN RE:)
Robert Kuyon) Docket No. 2023-2
License No. 026.0145746)

SPECIFICATION OF CHARGES

NOW COMES the State of Vermont and hereby makes the following charges
against Respondent Robert Kuyon:

Board Authority

1. The Vermont State Board of Nursing (the "Board") has authority to issue warnings or reprimands; suspend, revoke, limit, or condition current licenses; or prevent the renewal of lapsed licenses if, after disciplinary hearing, the Board finds that the Respondent has engaged in unprofessional conduct. 3 V.S.A. § 129(a); 3 V.S.A. § 129a; 3 V.S.A. § 814(d); 26 V.S.A. Chapter 28; the Administrative Rules of the Board of Nursing (the "ARBN"); and the Rules of the Office of Professional Regulation ("OPR").

Statement of Facts

2. Robert Kuyon ("Respondent") of Parker, Colorado is licensed by the State of Vermont as a Registered Nurse ("RN") under license number 026.0145746. This license was originally issued on May 10, 2021 and expires on March 31, 2023.
3. Respondent was also licensed as an RN by the State of Colorado under license number 85835. This license was issued on April 16, 2008 and was suspended indefinitely by order of the Colorado State Board of Nursing ("CO BON") effective July 23, 2021.
4. On or about March 7, 2021, Respondent was working at Children's Hospital Colorado as a day shift charge nurse at this facility's Intensive Psychiatric Unit.
5. On that shift, one of Respondent's patients was a juvenile identified as "L.M." ("Patient 1").
6. Patient 1 was, at that time, hospitalized with a primary diagnosis of Major Depressive Disorder and Anorexia Nervosa and a secondary diagnosis of Posttraumatic Stress Disorder.
7. Respondent was supposed to be relieved by the oncoming charge nurse assigned to the night shift ("Nurse C.R.") at the end of his shift at approximately 7 p.m.

STATE OF VERMONT



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8. Nurse C.R. was initially unable to locate Respondent to conduct their shift exchange procedures which included Respondent providing Nurse C.R. with a charge nurse report.
9. Nurse C.R. subsequently learned that Respondent was with Patient 1 in Patient 1's room.
10. Later in the shift, Nurse C.R. realized that Respondent was still with Patient 1 in her room.
11. Over the course of the next several hours, Nurse C.R. spoke to Respondent several times to instruct him that he needed to leave Patient 1's room.
12. Nurse C.R. also instructed other staff members to go to Patient 1's room and instruct Respondent to leave Patient 1's room.
13. Respondent remained in Patient 1's room and when instructed to leave by staff he kept saying "no."
14. Approximately two and a half hours after Respondent's shift ended and he clocked out, Nurse C.R. again instructed Respondent to leave, and observed Respondent say good bye to Patient 1 and leave her room.
15. As Respondent left Patient 1's room, he told Nurse C.R. that he had already clocked out.
16. On that same shift, Nurse M.M. was assigned specifically to care for Patient 1 as a Behavioral Health Specialist.
17. At approximately 6:15 p.m. that evening, Nurse M.M. observed Respondent begin rubbing Patient 1's back with his hand in a bathroom after Patient 1 had experienced an emotionally escalated event.
18. Subsequently, at approximately 7:20 p.m. Nurse M.M. observed Respondent sitting on the floor of Patient 1's room with Patient 1, with the door closed, and continuing to rub Patient 1's back with his hand.
19. In the location and context it was administered, Respondent's rubbing of Patient 1's back was not a normal therapy indicated for Patient 1 and a violation of professional boundaries.
20. On or about March 8, 2021, Respondent was placed on administrative leave from Children's Hospital Colorado, due to his actions on or about March 7, 2021.
21. On or about March 9, 2021, Children's Hospital Colorado filed a complaint with the CO BON, in which it alleged that Respondent had "failed to exhibit appropriate professional boundaries with a teenage, female patient."

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05620-3402

22. The allegations contained in the complaint were investigated at the request of the CO BON.
23. On or about April 19, 2021, Respondent responded to the allegations contained in the complaint through legal counsel retained to represent him in matters pertaining to the allegations contained in the complaint.
24. On or about May 10, 2021, Respondent applied for initial licensure as an RN in Vermont via the online application portal set up for this purpose.
25. As part of the process of applying for licensure in Vermont as an RN, Respondent was asked, "Are you currently under investigation by a licensing authority in Vermont or any other state, federal authority or other jurisdiction (US or elsewhere)?"
26. Respondent answered "no" to this question.
27. This answer was false because Respondent was being investigated by the CO BON at the time.
28. On May 20, 2021, the CO BON ordered Respondent "to submit to a Psychosexual examination...to determine if Respondent is able to practice nursing with reasonable skill and safety to patients."
29. The psychosexual examination that Respondent was ordered to undergo was to be scheduled within thirty (30) days of the CO BON's order.
30. On or about July 20, 2021, the CO BON determined that Respondent had not, as of that date, scheduled the psychosexual evaluation that he had been ordered to complete and as a result, suspended Respondent's Colorado license to practice nursing indefinitely.
31. On March 9, 2022, the CO BON approved a Stipulation and Final Agency Order ("the Stipulation and Order"), which required Respondent to relinquish his license.
32. The Stipulation and Order alleged that on or about March 7, 2021, Respondent acted outside professional boundaries in his interactions with a patient in the following ways:
 - a. Respondent stayed in a juvenile patient's room for over two hours after the end of his shift, and after he had clocked out. Several coworkers came into that patient's room to attempt to get Respondent to Leave. However, Respondent did not leave until the charge nurse on shift asked him for a second time to Leave.
 - b. Respondent sat on the floor with the same patient in her room and was observed rubbed her back. Respondent played music for this patient on his phone and showed her a video and photos of her grandfather's funeral. The

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patient was upset while watching the video. Respondent had not been authorized by the patient's treatment team to show her the photos/video. All of this occurred while Respondent was no longer on shift.

- c. After the events of March 7, 2021, Respondent accessed the same patient's medical chart from home without a legitimate nursing reason.

33. Respondent denied the allegations contained in the Stipulation and Order but acknowledged that if the allegations were to be proven at a formal disciplinary hearing, it would constitute a prima facie case of conduct that would subject Respondent to discipline under the applicable rules of Colorado.

Violation One: 3 V.S.A. § 129a(a)(26) Failing to maintain professional boundaries

34. The State re-alleges and incorporates Paragraphs 2 through 33 above.
35. Vermont law requires RNs to maintain professional boundaries in their practice of nursing.
36. Paragraphs 2 through 33 above demonstrate that Respondent failed to maintain professional boundaries when he gave a juvenile patient a back rub that was not a normal therapy indicated for that patient and a violation of professional boundaries, clocked out from his shift and entered a patient's room staying there for 2 ½ hours, and refused to leave the patient's room after being asked several times by several different staff members.
37. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent committed unprofessional conduct in violation of 3 V.S.A. §129a(a)(26).

Violation Two: 26 V.S.A. § 1582(a)(1) Making or causing to be made a false, fraudulent, or forged statement or representation in procuring or attempting to procure registration or renew a license

38. The State re-alleges and incorporates Paragraphs 2 through 33 above.
39. Vermont law prohibits making or causing to be made a false, fraudulent, or forged statement or representation in procuring or attempting to procure registration or renew a license
40. Paragraphs 2 through 33 above demonstrate that when Respondent applied for a Vermont RN license on May 10, 2021, he was asked if he was currently under investigation by a licensing authority in Vermont or any other state, federal authority or other jurisdiction (US or elsewhere), and answered "no," despite at that time being under investigation by the CO BN for allegations of professional misconduct related to practicing as a licensed RN.

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41. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent committed unprofessional conduct in violation of 26 V.S.A. §1582(a)(1).

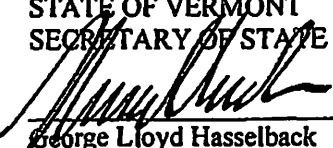
Relief Requested

WHEREFORE, the license of Robert Kuyon should be revoked, suspended, reprimanded, conditioned, or otherwise disciplined.

DATED at Vermont, this 9th day of January 2023.

STATE OF VERMONT
SECRETARY OF STATE

By:


George Lloyd Hasselback

Prosecuting Attorney

(802) 828-0350

george.hasselback@vermont.gov

STATE OF VERMONT



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