

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

IN RE:)
SANDRA AGHEDO) Docket No. 2025-126
License No. 026.0148858)

STIPULATION AND CONSENT ORDER

STIPULATION

NOW COME the State of Vermont, by and through State Prosecuting Attorney Ultan Doyle, and Respondent Sandra Aghedo, by and through her counsel Mark D. Oettinger, Esq., who stipulate and agree as follows:

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.

Stipulated Facts

2. Sandra Aghedo ("Respondent") of Fulshear, Texas is licensed by the State of Vermont as a Registered Nurse ("RN") under license number 026.0148858. This license was originally issued on January 11, 2022 and expires on March 31, 2027.
3. Respondent's license expired on March 31, 2023, and Respondent did not renew it until February 1, 2025.
4. Respondent also holds a Texas RN License, which was issued on August 25, 2020 and expires on September 30, 2026, as well as a Personal Nurse ("PN") Texas license, which was issued on July 27, 2016 and expires on September 30, 2026.
5. On March 23, 2023, the Texas Board of Nursing filed charges against Respondent's RN license, alleging that Respondent obtained her nursing diploma/degree through fraudulent means.
6. As of the date of this filing, these charges remain pending.
7. In her February 1, 2025 renewal application, Respondent was asked the following question:

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

Since your license was last renewed (or since it was issued if within the last two years):

Are you currently under INVESTIGATION or PENDING CHARGES in Vermont or ANY other state, federal authority, or other jurisdiction?

If "Yes," you must provide a detailed written explanation and a copy of any available information from the licensing authority.

8. Respondent answered "No" to this question.
9. This answer was false because at the time of her renewal application, Respondent had a pending disciplinary action against her Texas RN license.
10. Applicant signed the Application with the following admonitions and certifications in the "Attestation" section:

Caution to Applicant

A false statement on this application may constitute unprofessional conduct and may be a basis for denial of a license application or discipline of a license, to include revocation. 3 V.S.A. § 129a. A person who declares, certifies, or verifies in a signed writing that a statement is true and is made under the pains and penalties of perjury, and who willfully makes a false statement in the declaration, certification, or verification, shall be guilty of perjury, a crime punishable by imprisonment not more than 15 years or a fine of not more than \$10,000.00, or both. 13 V.S.A. § 2901 & 2904(b).

Certification of Identity

In the case of an application for individual licensure, I am the person in whose name this application is completed; or in the case of a corporate applicant, I am an authorized officer of the applicant corporation, having executive authority to complete this application and personal knowledge of and accountability for the representations herein.

Certification of Accuracy

I understand that submission of this application represents that I have understood each question, that I have been candid and disclosed all relevant information, and that I have answered each question from sound personal knowledge, not a hunch, guess, or supposition. I understand that any failure to provide accurate information could result in a preliminary denial of my application or as a basis for unprofessional conduct charges against my license.

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Certification of Truthfulness

I hereby certify, under the pains and penalties of perjury, that the answers, entries, and representations herein are true and accurate.

11. Based on the representations Applicant made in her renewal application, OPR issued Respondent an RN license.
12. When asked by an OPR investigator why she did not disclose her pending discipline in Texas on her Vermont renewal application, Respondent admitted that she had made a mistake and said that she clicked too quickly when answering the questions on the application, and that she should have reviewed the application before finishing and submitting it.

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.

13. Paragraphs 2 through 12 above are incorporated herein.
14. As an RN, Respondent is required to refrain from making false statements in renewing a license.
15. Paragraphs 2 through 12 demonstrate that Respondent made a false statement in her license renewal application by answering "No" to the question of whether she was currently under investigation or pending charges in Vermont or any other state, federal authority, or other jurisdiction.
16. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent committed unprofessional conduct by 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 in violation of 26 V.S.A. §1582(a)(1).

Understandings

17. Respondent admits that the facts above are true and that the conditions below are necessary to protect the public.
18. 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.
19. Respondent specifically waives any claims that any disclosures made to the Board during the review of this agreement have prejudiced Respondent's rights to a fair and impartial hearing in future hearings if this agreement is not accepted by the Board and proceeds to a hearing on the merits before the same Board.

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20. Respondent has read and reviewed this entire document and agrees that it contains the entire agreement between the parties.
21. Respondent is not under the influence of any drugs or alcohol at the time Respondent signs this Stipulation and Consent Order.
22. 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.
23. 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.
24. Respondent understands that she is responsible for all compliance costs associated with this Stipulation and Consent Order.
25. Respondent agrees that the Board may enter the Order set forth below.

ORDER

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

- A. The Board of Nursing hereby **WARNS** Respondent's license.
- B. The Board of Nursing **ASSESSES AN ADMINISTRATIVE PENALTY OF FIVE HUNDRED DOLLARS (\$500.00)** against Respondent. Respondent shall remit payment within six (6) months of the date of entry of this Order. This penalty is to be paid within 180 days of the date of entry of this Order.
- C. Notwithstanding any provision above, Respondent must continue to meet all Board requirements for maintaining a license, license renewal and license reinstatement.
- D. 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).
- E. This Stipulation and Consent Order will remain part of Respondent's licensing file and may be considered relative to any future disciplinary matter.

AGREED TO:

STATE OF VERMONT
SECRETARY OF STATE

Dated: 10/10/25

By: Ultan Doyle
Ultan Doyle
Prosecuting Attorney

STATE OF VERMONT



Prosecuting Attorney
Office of
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Montpelier, VT
05620-3402

SANDRA AGHEDO
RESPONDENT

Dated: 10-8-25

By: Sandra Aghedo
Sandra Aghedo

APPROVED AS TO FORM:

MARK D. OETTINGER
ATTORNEY FOR RESPONDENT

Dated: 10/10/2025

By: [Signature]
Anthony L. Barmick
on behalf of Mark D. Oettinger, Esq.

APPROVED AND SO ORDERED:

VERMONT BOARD OF NURSING

Dated: 10/13/2025

Signed by:
By: William James Floyd III
3B82E783001248E...
Board Chair

Date of Entry: 10/14/2025

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IN RE:)
SANDRA AGHEDO) **Docket No. 2025-126**
License No. 026.0148858)

SPECIFICATION OF CHARGES

NOW COMES the State of Vermont and makes the following Charges against the Respondent Sandra Aghedo:

Board Authority

1. The Vermont State Board of Nursing (the "Board") has jurisdiction to investigate and adjudicate allegations of unprofessional conduct committed by Registered Nurses pursuant to 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. Sandra Aghedo ("Respondent") of Fulshear, Texas is licensed by the State of Vermont as a Registered Nurse ("RN") under license number 026.0148858. This license was originally issued on January 11, 2022 and expires on March 31, 2027.
3. Respondent's license expired on March 31, 2023, and Respondent did not renew it until February 1, 2025.
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If "Yes," you must provide a detailed written explanation and a copy of any available information from the licensing authority.

8. Respondent answered "No" to this question.
9. This answer was false because at the time of her renewal application, Respondent had a pending disciplinary action against her Texas RN license.
10. Applicant signed the Application with the following admonitions and certifications in the "Attestation" section:

Caution to Applicant

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11. Based on the representations Applicant made in her renewal application, OPR issued Respondent an RN license.
12. When asked by an OPR investigator why she did not disclose her pending discipline in Texas on her Vermont renewal application, Respondent admitted that she had made a mistake and said that she clicked too quickly when answering the questions on the application, and that she should have reviewed the application before finishing and submitting it.

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.

13. The State re-alleges and incorporates Paragraphs 2 through 12 above.
14. Respondent is required to refrain from making false statements in renewing a license.
15. Paragraphs 2 through 12 demonstrate that Respondent made a false statement in her license renewal application by answering "No" to the question of whether she was currently under investigation or pending charges in Vermont or any other state, federal authority, or other jurisdiction.
16. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent committed unprofessional conduct by 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 in violation of 26 V.S.A. §1582(a)(1).

Relief Requested

WHEREFORE, the RN license of Sandra Aghedo should be revoked, suspended, reprimanded, conditioned, or otherwise disciplined.

DATED at Montpelier, Vermont this 22nd day of July, 2025.

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STATE OF VERMONT
SECRETARY OF STATE

By:


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