

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

IN RE:)
TREVER MICHEAL COON) **Docket No. 2025-32**
License No. 075.0134287)

STIPULATION AND CONSENT ORDER

STIPULATION

NOW COME the State of Vermont, by and through Prosecuting Attorney Zoe Newman, and Respondent Trever Micheal Coon who hereby stipulate and agree as follows:

Authority

1. The [Vermont Board of Nursing (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 Rules).

Stipulated Facts

2. Trever Micheal Coon (Respondent) of North Bennington, Vermont, was licensed by the State of Vermont as a Licensed Nursing Assistant (LNA) under license number 075.0134287. This license was originally issued on March 7, 2018, expired on November 30, 2020, was re-issued on September 17, 2024, and is set to expire on November 30, 2026.
3. On or about March 28, 2016, Respondent was convicted of Driving Under the Influence, First Offense, under 23 V.S.A. 1201(a)(2), by the Vermont Superior Court, Criminal Division, Bennington Unit (2016 First Conviction).
4. On or about December 19, 2016, Respondent was convicted of Driving Under the Influence, Second Offense, under 23 V.S.A. 1201(a)(2), by the Vermont Superior Court, Criminal Division, Bennington Unit (2016 Second Conviction).
5. On or about January 11, 2018, Respondent applied for a LNA license with the State of Vermont (2018 Application) and, was asked, as part of the Application: "Have you EVER been convicted of a crime other than a minor traffic violation?"

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89 Main Street
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(Driving While Intoxicated and Driving Under the Influence are not minor traffic violations)”

6. Respondent answered “No” to this question.
7. This answer was false due to the 2016 First Conviction and the 2016 Second Conviction.
8. Respondent signed the Application with the following admonitions and certifications in the “Attestation” section:

I certify, under the pains and penalties of perjury, that all information I have provided in this application is true and accurate. I understand that furnishing false information may constitute unprofessional conduct and result in the denial of my application or further disciplinary action. The maximum penalty for perjury is fifteen years in prison and/or a \$10,000 fine. (13 V.S.A. § 2901).

9. Based on the representations Respondent made in the Application, OPR issued Respondent a LNA license on March 7, 2018.
10. On or about April 29, 2019, Respondent was convicted of Careless or Negligent Operation, under 23 V.S.A. 1091(a), and Operating with a Suspended License for Driving Under the Influence, under 23 V.S.A 674(b), by the Vermont Superior Court, Criminal Division, Bennington Unit (2019 Conviction).
11. On November 30, 2020, Respondent’s Vermont LNA license expired.
12. On or about July 17, 2024, Respondent applied to renew his LNA license with the State of Vermont (2024 Application) and, was asked, as part of the Application: “Since your license was last renewed (or since it was issued if within the last two years): Have you EVER been convicted of a criminal misdemeanor or felony in Vermont or Any other state, federal authority, or other jurisdiction?”
13. Respondent answered “No” to this question.
14. This answer was false due to the 2019 Conviction.
15. Respondent signed the 2024 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

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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 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.

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 Truthfulness

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

16. Based on the representations Respondent made in the 2024 Application, OPR renewed Respondent's LNA license on September 17, 2024.

Violation One: 3 V.S.A. § 129a(a)(1) Fraudulent or deceptive procurement or use of a license.

17. The State re-alleges and incorporates Paragraphs 2 through 16 above.
18. Paragraphs 2 through 16 demonstrate that Respondent twice engaged in fraudulent or deceptive procurement of a license: 1. by falsely answering in the 2018 Application by failing to disclose the two 2016 Convictions and 2. by falsely answering in the 2024 Application by failing to disclose the 2019 Conviction.
19. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent committed unprofessional conduct of a character likely to deceive, defraud, or harm the public in violation of 3 V.S.A. § 129a(a)(1).

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Understandings

30. Respondent admits the facts above are true and the conditions below are necessary to protect the public. 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 dispute that the State may be able to prove these charges by a preponderance of the evidence if this matter proceeds to a merits hearing.

31. 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.
32. Respondent specifically waives any claim that any disclosures made to the Board during review of this agreement have prejudiced Respondent's right to a fair and impartial hearing if this agreement is not accepted and proceeds to a hearing on the merits before the same Board.
33. Respondent has read and reviewed this entire document and agrees it contains the entire agreement between the parties.
34. Respondent is not under the influence of any drugs or alcohol at the time of signing this Stipulation and Consent Order.
35. 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.
36. Respondent voluntarily waives the right to a contested hearing before the Board and waives any right to appeal from this Stipulation and Consent Order.
37. Respondent understands that she is responsible for all compliance costs associated with this Stipulation and Consent Order.
38. Respondent agrees 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 **REPREMANDS** Respondent's license.
- B. The Board hereby **ASSESSES AN ADMINISTRATIVE PENALTY IN THE AMOUNT OF TWO HUNDRED AND FIFTY DOLLARS (\$250.00)]** against Respondent. This penalty is to be paid within Thirty (30) days of the date of entry of this Order.
- C. The Board hereby **CONDITIONS** Respondent's Licensed Nursing Assistant license for a **MINIMUM OF three (3) MONTHS, commencing on the date of entry**. The **CONDITIONS** shall be as follows:
 - i. Length of Time of Conditions Imposed. The conditions shall remain in place until Respondent has completed all conditions as ordered and not less than three (3) months.
 - ii. Monitoring. The Office of Professional Regulation, through the Enforcement

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Case Manager, shall be responsible for monitoring Respondent's compliance with these Conditions. All reports and/or correspondence regarding compliance with these conditions shall be submitted to the Case Manager in accordance with the Conditions listed below.

- iii. Required Coursework. Respondent shall, within ninety (90) days following the entry of this Order, at his own expense, complete eight (8) hours of pre-approved courses, which must include the following topics: 1. Ethics in Nursing and 2. Reading for Comprehension. For pre-approval, Respondent must submit to the Case Manager the name of each course, the name of the sponsoring organization, and a description of the course content and/or syllabus. Respondent must achieve a passing score on the post-tests for the courses, and submit test results, workbooks completed in full and in a satisfactory manner, and certificates of completion to the Office of Professional Regulation.

Failure to complete the courses within the prescribed timeframe shall constitute a violation of this Order. The coursework may not be counted toward any continuing education requirement of licensure.

- iv. Notification to Other States. In the event Respondent is licensed in any other state(s), Respondent must inform the licensing board of the state(s) in which Respondent is licensed of the conditional status of Respondent's Vermont license within thirty (30) days of the date of entry of this Order.
- v. License Renewal. This Order does not automatically extend the license and Respondent must comply with the requirements for license renewal.
- vi. Costs. Respondent shall bear all costs of complying with this Consent Order.
- vii. Violation of this Order. If Respondent violates this Order, the Board, after giving Respondent notice and an opportunity to be heard, may rescind or modify this Order and impose additional appropriate disciplinary actions. If a complaint of unprofessional conduct is made against Respondent during the term of this Order, this Order shall be automatically extended until the unprofessional conduct matter is resolved.
- viii. Completion of Conditional License Period. Respondent shall submit a petition to the Docket Clerk to remove any and all conditions from Respondent's license. The State will support or oppose Respondent's petition. The Board will conduct a hearing if necessary. Respondent bears the burden and must present proof that Respondent has fully complied with the terms of this Order and these conditions are no longer necessary to protect the public.
- D. Notwithstanding any provision above, the Respondent must continue to meet all requirements for maintaining a license, license renewal and 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).

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F. This Stipulation and Consent Order will remain part of Respondent's licensing file and may be used for purposes of determining sanctions in any future disciplinary matter.

AGREED TO:

Dated: 7/14/2025

STATE OF VERMONT
SECRETARY OF STATE
Signed by:
By: Zoe Newman
Zoe Newman
Prosecuting Attorney

Dated: 7/14/2025

RESPONDENT
Signed by:
By: Trever Michael Coon
Trever Michael Coon

APPROVED AND SO ORDERED:

Dated: 8/13/2025

VERMONT BOARD OF NURSING
Signed by:
By: William James Floyd III
Chairperson

Date of Entry: 8/13/25

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License No. 075.0134287)

SPECIFICATION OF CHARGES

NOW COMES the State of Vermont, by and through State Prosecuting Attorney, Zoe Newman, and makes the following charges against the Respondent, Trever Micheal Coon:

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.

Statement of Facts

2. Trever Micheal Coon (Respondent) of North Bennington, Vermont, was licensed by the State of Vermont as a Licensed Nursing Assistant (LNA) under license number 075.0134287. This license was originally issued on March 7, 2018, expired on November 30, 2020, was re-issued on September 17, 2024, and is set to expire on November 30, 2026.
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“Have you EVER been convicted of a crime other than a minor traffic violation? (Driving While Intoxicated and Driving Under the Influence are not minor traffic violations)”

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7. This answer was false due to the 2016 First Conviction and the 2016 Second Conviction.
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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 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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16. Based on the representations Respondent made in the 2024 Application, OPR renewed Respondent's LNA license on September 17, 2024.

Violation One: 3 V.S.A. § 129a(a)(1) Fraudulent or deceptive procurement or use of a license.

17. The State re-alleges and incorporates Paragraphs 2 through 16 above.
18. Paragraphs 2 through 16 demonstrate that Respondent twice engaged in fraudulent or deceptive procurement of a license: 1. by falsely answering in the 2018 Application by failing to disclose the two 2016 Convictions and 2. by falsely answering in the 2024 Application by failing to disclose the 2019 Conviction.
19. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because Respondent committed unprofessional conduct of a character likely to deceive, defraud, or harm the public in violation of 3 V.S.A. § 129a(a)(1).

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Relief Requested

WHEREFORE, the LNA license of Respondent should be revoked, suspended, reprimanded, conditioned, or otherwise disciplined.

DATED 12th day of March, 2025.

STATE OF VERMONT
SECRETARY OF STATE

By: *Zoe Newman*
Zoe Newman
State Prosecuting Attorney
89 Main Street, 3rd Floor
Montpelier, VT 05620-3402
zoe.newman@vermont.gov

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Professional Regulation
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05620-3402