

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

**IN RE:** )  
**Kathleen Victoria Stone** ) **Docket No. 2025-60**  
**Application Tracking No. LI-795847** )

**STIPULATION AND CONSENT ORDER**

NOW COME the State of Vermont, by and through Prosecuting Attorney Rachel Heath, and Applicant Kathleen Stone who stipulate and agree as follows:

**Authority**

1. The Office of Professional Regulation has authority to deny an applicant's license if it finds that the applicant has engaged in unprofessional conduct in any jurisdiction. 3 V.S.A. § 129(a); 3 V.S.A. § 129a; 26 V.S.A. Ch.28; the Vermont Board of Nursing Administrative Rules, and the Rules of the Office of Professional Regulation.

**Stipulated Facts and Basis for Denial**

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

2. On December 31, 2024, Applicant submitted an application for licensure as a Licensed Practical Nurse (LPN) to the Vermont State Office of Professional Regulation.
3. Applicant signed her application with the following attestation:

**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

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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.

**Certification of Truthfulness**

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

4. Within the Application, under the pains and penalties of perjury, applicant answered "No" to the question:

Have you EVER been convicted of a criminal misdemeanor or felony in Vermont or ANY other state, federal authority, or other jurisdiction?

If "Yes," you must provide a detailed written explanation and attach the official court documents (i.e., affidavit of probable cause, information, sentencing documents, docket report) or as requested by the Office.

5. This answer was false.
6. Applicant failed to disclose that in 1991, she pleaded guilty to Petit Larceny, a misdemeanor, in docket number 91-0035-1, Onondaga County Court, New York.
7. Within the Application, under the pains and penalties of perjury, applicant answered "No" to the question:

Has Vermont or any other state, federal authority, or other jurisdiction EVER taken any DISCIPLINARY ACTION against (e.g., warned, reprimanded, fined, restricted, conditioned, suspended, revoked, or conditioned) a license, certificate, registration, or authorization to practice any profession that you hold or have held in any profession or occupation?

If "Yes," you must provide a copy of the order or official notification of the action.

8. This answer was false.

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9. Applicant failed to disclose that on or about December 10, 2020, the New York Board of Nursing indefinitely suspended Applicant for a minimum of one month until found fit to practice and 2 years of probation upon return to practice in New York and a \$500 fine.
10. The basis for Applicant's discipline included filing false reports by stating in a license renewal application that her employment had not been terminated when her employment had in fact been terminated, and practicing the profession of nursing with negligence on more than one occasion when she made medication administration errors.
11. Applicant's suspension was lifted on October 15, 2021. However, Applicant has never returned to practice in New York and therefore has never completed the two years of probation required by her December 2020 New York Board Order.
12. Based on the representations Applicant made in her Application, OPR issued Applicant a provisional license on January 7, 2025 pending receipt of her federal criminal background check.
13. On March 18, 2025, OPR rescinded Applicant's provisional license on the basis that her background check had been received and demonstrated Applicant had a misdemeanor criminal conviction that she failed to disclose in her application.
14. Paragraphs 2 through 13 demonstrate that Applicant engaged in fraudulent or deceptive procurement of a license by answering in her Application that she did not have any prior criminal convictions or discipline against her license in any state.

#### Understandings

15. Applicant admits the facts as outlined above are true and the Board may find that the Applicant engaged in unprofessional conduct.
16. Applicant admits that the order below is necessary to protect the public.
17. Applicant 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.
18. Applicant specifically waives any claims that any disclosures made to the Board during its review of this agreement have prejudiced Applicant's rights to a fair and impartial hearing in future hearings if the Board does not accept this agreement.
19. Applicant has read and reviewed this entire document and agrees that this document contains the entire agreement between the parties.
20. Applicant is not under the influence of any drugs or alcohol at the time of signature of this Stipulation and Consent Order.

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21. Applicant 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.
22. Applicant voluntarily waives the right to a contested hearing before the Board and waives any right to appeal from this Stipulation and Consent Order.
23. Applicant 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 hereby grants Applicant's licensure as an LPN.
- B. The Board hereby **WARNS** Applicant's license as an LPN when it is issued.
- C. The Board of Nursing hereby **CONDITIONS** Applicant's license commencing with the date of entry of this Stipulation and Consent Order. The conditions will be as follows:
  1. Re-issuance of License. Upon the commencement of these conditions, Applicant shall be issued a license labeled "conditioned."
  2. License Renewal. This Order does not automatically extend the license and Applicant must comply with the requirements for license renewal.
  3. Length of Time of Conditions Imposed. Applicant shall be subject to the conditions until Applicant has fully completed all conditions as ordered.
  4. Monitoring. The Office of Professional Regulation, through the Enforcement Case Manager, shall be responsible for monitoring Applicant's compliance with these Conditions. All reports or correspondence regarding compliance with these conditions shall be submitted to the Case Manager in accordance with the Conditions listed below.
  5. Required Coursework. Applicant shall, at her own expense and within ninety (90) days of the date of entry of this Stipulation and Consent Order, successfully complete (i.e., receive a passing score, if applicable) the following coursework, or equivalent pre-approved by the Enforcement Case Manager.
    - a. Righting a Wrong: Ethics & Professionalism in Nursing, from International Center for Regulatory Scholarship, 3 hours, and available here:

<https://catalog.icrsncsbn.org/browse/public/continuing-ed/nurses/courses/righting-a-wrong-wi-25>

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- b. Medication Reconciliation: Avoiding Errors, from Relias Academy, 0.5 hours, and available here:

<https://reliasacademy.com/rls/store/courses/medication-reconciliation-avoiding-errors/> /A-product-cl674593

Applicant shall submit the certificates of completion, completed assignment book(s) and quiz results, if applicable, to the Enforcement Case Manager. Failure to satisfactorily 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.

6. Notification to Other States. If Applicant is licensed in nursing in any other state(s), Applicant must inform the nursing licensing board of the state(s) in which Applicant is licensed of the conditional status of Applicant's Vermont nursing license within thirty (30) days of the date of entry of this Order.
7. Costs. Applicant shall bear all costs of complying with this Consent Order.
8. Violation of this Order. If Applicant violates this Order the Board, after giving Applicant 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 Applicant during the term of this Order, this Order shall be automatically extended until the unprofessional conduct matter is concluded.
9. Completion of Conditional License Period. Applicant shall submit a petition to the Docket Clerk to remove any and all conditions on Applicant's license. The State may assent to or oppose Applicant's petition. The Board will conduct a hearing if necessary. Applicant bears the burden and must present proof that Applicant 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, Applicant 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).
- F. This Stipulation and Consent Order will remain part of Applicant's licensing file and may be used for purposes of determining sanctions in any future disciplinary matter.

*(Signatures on the following page)*

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AGREED TO:

Dated: 6/4/2025

STATE OF VERMONT  
SECRETARY OF STATE

By: Signed by:  
Rachel Heath  
ECA248D7D28242B  
Rachel Heath  
Prosecuting Attorney

APPLICANT

Dated: 6/4/2025

By: DocuSigned by:  
Kathleen Stone  
EA78BF084206454...  
Kathleen Stone

APPROVED AND SO ORDERED:

Dated: 6/10/2025

By: Signed by:  
William James Floyd III  
3B82E7A300124BE...  
Board Chairperson

Date of Entry: 6/10/2025

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