

**State of Vermont
Secretary of State
Office of Professional Regulation
Board of Nursing**

In re: Bonnie Peluso
License No. 075.0049708
Docket No. 2026-96

STIPULATED VOLUNTARY SURRENDER OF LICENSE AND ORDER

STIPULATION

NOW COMES the State of Vermont, by and through Prosecuting Attorney Zoe Newman, and Respondent Bonnie Peluso who hereby stipulate and agree as follows:

Board Authority

1. The Vermont State Board of Nursing (Board) has jurisdiction to investigate and adjudicate allegations of unprofessional conduct committed by 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 (ARBN); and the Rules of the Office of Professional Regulation (OPR).

Stipulated Facts

2. Bonnie Peluso, (Respondent) of Saint Johnsbury, Vermont is licensed by the State of Vermont as a LNA under license number 075.0049708. This license was originally issued on June 19, 2009, and expires on November 30, 2026.
3. During the relevant time, Respondent worked providing personal care for a Medicaid beneficiary, herein referred to as the Beneficiary.
4. In order to be paid for her personal care work, Respondent was required to submit timesheets to ARIS, a third party contractor that managed Medicaid payments for the State of Vermont.
5. After submitting her timesheets to ARIS, Respondent was paid for her work by Vermont Medicaid, a federally funded program.
6. According to Respondent, she stopped providing personal care to the Beneficiary in either October or November of 2025 but continued to submit timesheets for payment.
7. Respondent identified three timesheets she submitted to ARIS for payment in which she claimed she had worked hours she had not, in fact, worked.
8. In total, Respondent submitted that she worked 217 hours that she had not worked.

9. On the bottom of each timesheet, Respondent signed below the following attestation:

I (below) certify, under the pains and penalty of perjury, to the best of my knowledge, that the dates, start and end times, and hours provided on this form are true, accurate, and complete. I understand that submitting an inaccurate time sheet may result in termination of the employer and/or employee from this program and may result in civil and/or criminal penalties.

Violation One: 3 V.S.A. § 129a(a)(3): Failing to comply with provisions of federal or State statutes or rules governing the practice of the profession.

10. Paragraphs 2 through 9 above are incorporated herein.
11. Under Vermont law, a LNA is required to comply with provisions of federal or State statutes or rules governing the practice of the profession.
12. 33 V.S.A. § 141(d) prohibits a service provider from knowingly filing a claim for services to a recipient of benefits under a State or federally funded assistance program for services that were not rendered.
13. Paragraphs 2 through 9 above demonstrate that Respondent knowingly filed a claim for services to a recipient of benefits under a State or federally funded assistance program for services that were not rendered when Respondent submitted three separate timesheets for payment by Vermont Medicaid on behalf of the Beneficiary, a Medicaid beneficiary, when Respondent had not rendered the claimed services.
14. 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)(3).

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

15. Paragraphs 2 through 9 above are incorporated herein.
16. Under Vermont law, a LNA is prohibited from engaging in conduct of a character likely to deceive, defraud, or harm the public.
17. Paragraphs 2 through 9 above demonstrate that Respondent engaged in conduct of a character likely to deceive, defraud, or harm the public when Respondent submitted three separate timesheets for payment to the State of Vermont's Medicaid program for personal care services for the Beneficiary when Respondent had not provided those services.
18. 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)(28).

Understandings

19. Respondent admits the facts above are true and the conditions below are necessary to protect the public.
20. Respondent understands that the Board must review and accept the terms of the Stipulated Voluntary Surrender of License. If the Board rejects any portion, the entire Stipulated Voluntary Surrender of License shall be null and void.
21. 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.
22. Respondent has read and reviewed this entire document and agrees it contains the entire agreement between the parties.
23. Respondent is not under the influence of any drugs or alcohol at the time of signing this Stipulated Voluntary Surrender of License.
24. Respondent voluntarily enters into this agreement after the opportunity to consult with legal counsel and is not being coerced by anyone into signing this Stipulated Voluntary Surrender of License.
25. Respondent voluntarily waives the right to a contested hearing before the Board and waives any right to appeal from this Stipulated Voluntary Surrender of License.
26. Respondent understands that she is responsible for all compliance costs associated with this Stipulated Voluntary Surrender of License.
27. Respondent agrees the Board may enter the Acceptance of Voluntary Surrender of License set forth below.

ACCEPTANCE OF VOLUNTARY SURRENDER AND ORDER

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

- A. The Board of Nursing hereby **ACCEPTS** Respondent's **VOLUNTARY SURRENDER** of her LNA license.
- B. Pursuant to 3 V.S.A. § 125(b)(11), a Disciplinary Action Surcharge in the amount of two-hundred and fifty dollars (\$250.00) is assessed against Respondent. Respondent shall remit payment within six (6) months of the date of entry of this Order. Payment of the surcharge may be on a payment plan if needed. Failure to remit payment may result in the non-renewal of Respondent's license/registration.
- C. Any future application for licensure shall be subject to the licensing requirements of that particular profession. If a future application for licensure in the State of Vermont is approved, that license shall be **CONDITIONED** pursuant to whatever

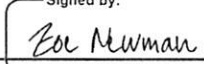
terms are found to be reasonable at the time of Respondent's application for licensure, taking into account the facts above.

- D. This Stipulated Voluntary Surrender of License and 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 Stipulated Voluntary Surrender of License and Order applies to all licenses this Board issues to Respondent, including future licenses, as provided in 3 V.S.A. § 129(I).
- F. This Stipulated Voluntary Surrender of License and Order will remain part of Respondent's licensing file and may be used for purposes of determining sanctions in any future disciplinary matter.

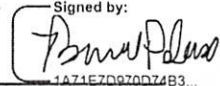
AGREED TO:

Dated: 8/4/2026

**STATE OF VERMONT
SECRETARY OF STATE**

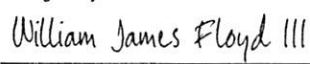
Signed by:

Zoe Newman
Prosecuting Attorney

Dated: 8/4/2026

Respondent
Signed by:

Bonnie Peluso

APPROVED AND SO ORDERED:

Dated: 8/10/2026

Vermont Board of Nursing
Signed by:

William James Floyd III
Chairperson

Date of Entry: 8/11/26