

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

IN RE:
ALETA COSTOPOULOS
License No. 026.0024577

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Docket No. 2012-701

STIPULATION AND CONSENT ORDER

Stipulation

NOW COME the State of Vermont, by and through State Prosecuting Attorney Gabriel M. Gilman, and the Respondent, Aleta Costopoulos, 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. § 1582; the Administrative Rules of the Board of Nursing (the "ARBN"); and the Rules of the Office of Professional Regulation.

Stipulated Facts

2. Aleta Costopoulos (the "Respondent") of Burlington, Vermont was licensed by the State of Vermont as a Registered Nurse under license number 026.0024577. This license was originally issued on or about February 8, 1999 and expired on July 24, 2008.
3. On or about June 12, 2008, Respondent signed a Stipulation and Consent Order which indefinitely suspended Respondent's license to practice nursing in the State of Vermont. Respondent's nursing license has not been reinstated since.
4. On or about November 8, 2012, Respondent called the Department of Vermont Health Access multiple times seeking information about a pending application for prior authorization for medication. During one call, Respondent falsely identified herself as a Registered Nurse. During another call, Respondent falsely identified herself as a particular Registered Nurse from Northern Counties Health Care. Respondent's purpose was to obtain information about her own request for prior authorization, not to obtain the personal medical information of any other person.

Violations

5. The act(s), omission(s), and/or circumstance(s) described above constitute grounds for discipline because the Respondent has committed unprofessional conduct in violation of:

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
National Life Building
Second Floor North
Montpelier, VT
05620-3602

- a. 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);
- b. 3 V.S.A. § 129a(a)(4) (Failing to comply with an order of the board or violating any term or condition of a license restricted by the board);
- c. 26 V.S.A. § 1582(a)(7) (Engages in conduct of a character likely to deceive, defraud, or harm the public);
- d. 26 V.S.A. § 1584(a)(4) (In shall be a violation of this chapter for any person, including any corporation, association, or individual, to: (4) Use in connection with a name any words, letters, signs, or figures which imply that a person is a registered or practical nurse or an advanced practice registered nurse when not authorized under this chapter).

Understandings

- 6. Respondent admits that the facts above are true and that the conditions below are necessary to protect the public.
- 7. Respondent understands that the Nursing 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.
- 8. Respondent specifically waives any claims that any disclosures made to the full Board during its review of this agreement have prejudiced her rights to a fair and impartial hearing in future hearings if this agreement is not accepted by the Board.
- 9. Respondent has read and reviewed this entire document and agrees that it contains the entire agreement between the parties.
- 10. Respondent is not under the influence of any drugs or alcohol at the time she signs this Stipulation and Consent Order.
- 11. 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.
- 12. Respondent voluntarily waives her right to a contested hearing before the Board of Nursing and waives any right to appeal from this Stipulation and Consent Order.
- 13. Respondent agrees that the Order set forth below may be entered by the Board.

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CONSENT ORDER

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

- A. The Board of Nursing hereby **REPRIMANDS** the Respondent's license.
- B. Notwithstanding any provision above, the Respondent must continue to meet all Nursing Board requirements for maintaining a license, license renewal and license reinstatement.
- C. 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).
- D. 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. The Board may consider this Stipulation and Consent Order in relation to any petition for reinstatement of Respondent's license.

AGREED TO:

STATE OF VERMONT
SECRETARY OF STATE

Dated: 6/11/2013

By: [Signature]
Gabriel M. Gilman
State Prosecuting Attorney

ALETA COSTOPOULOS
RESPONDENT

Dated: 06/03/2013

By: [Signature]
Aleta Costopoulos

STATE OF VERMONT



Prosecuting Attorney
Office of
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APPROVED AND SO ORDERED:

VERMONT BOARD OF NURSING

Dated: 6/10/13

Date of Entry: 6/10/13

By: [Signature]
Chairperson