

STATE OF VERMONT
BOARD OF NURSING

IN RE:

Jane Fritz

License No: 26-14458

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Docket No. NU62-0500

STIPULATION AND CONSENT ORDER

STIPULATION

NOW COME the State of Vermont, through its Attorney General William H. Sorrell, and Respondent Jane Fritz, and stipulate and agree as follows:

1. The Vermont Board of Nursing has jurisdiction to investigate and adjudicate allegations of unprofessional conduct committed by nurses and nursing assistants pursuant to 3 V.S.A. §§129, 129a; 26 V.S.A. §§1574, 1582, 1595 and 1598; the Board of Nursing's Rules and the Office of Professional Regulation's Rules.
2. Respondent Jane Fritz, of Bennington, Vermont, is a registered nurse, holding license number 26-14458, issued by the State of Vermont, since about October 16, 1981.
3. Respondent admits that as of February 1, 1999, she failed to file a Vermont Individual income tax return for the tax year 1997.
4. Respondent admits that on or about February 1, 1999, Respondent was not in good standing within the meaning of 32 V.S.A. §3313, because of an unpaid joint income tax liability.

Office of the
ATTORNEY
GENERAL
109 State Street
Montpelier, VT
05609

5. Respondent admits that on or about February 1, 1999, she prepared, signed and/or filed a Renewal Application with the Vermont Secretary of State, Office of Professional Regulation. On this application, Respondent indicated as follows:
 - a. "I hereby certify, under the pains and penalties of perjury, that I am in good standing with respect to or in full compliance with a plan to pay any and all taxes due to the State of Vermont as of the date of this application..."
 - b. "I certify that the information stated by me in this application is true and accurate to the best of my knowledge and that providing false information or omission of information is unlawful and may jeopardize my license/certification/registration status."
6. Respondent represents that she has subsequently come into good standing within the meaning of 32 V.S.A. §3313.
7. Respondent admits the conclusions as set forth below in the Board's Order.
8. 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.
9. Respondent has read and reviewed this entire document and agrees that it contains the entire agreement between the parties.
10. Respondent waives any notification period and agrees to have this document reviewed by the Board during the next available meeting. 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.
11. Respondent is not under the influence of any drugs or alcohol at the time she signs this Stipulation and Consent Order.

12. Respondent voluntarily enters this agreement after the opportunity to consult with legal counsel and is not being coerced by anyone into signing this Stipulation and Consent Order.
13. Respondent voluntarily waives her right to charges and a contested hearing before the Board of Nursing.
14. Respondent agrees that the Board may set forth the order below.

ORDER

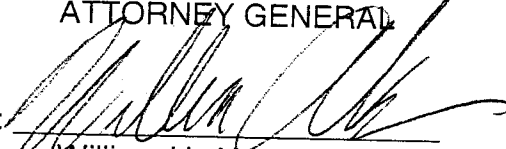
Based on the stipulation above it is **ORDERED AND ADJUDGED** as follows:

- A. By engaging in the conduct above, Respondent acted in violation of: 26 VSA §1582(a)(1) (Has made or caused to be made a false...statement or representation in procuring or attempting to procure registration or renew a license to practice nursing).
- B. The Board of Nursing **REPRIMANDS** the Respondent.
- 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.

STATE OF VERMONT

WILLIAM H. SORRELL
ATTORNEY GENERAL

Dated: 3/12/01

by: 
William H. Ahlers
Assistant Attorney General

RESPONDENT
JANE FRITZ

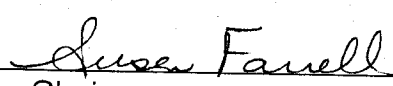
Dated: 3 8 01

by: 
Jane Fritz

APPROVED AND SO ORDERED:

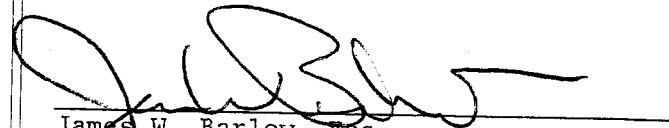
VERMONT BOARD OF NURSING

Dated: 3/12/01

by: 
Chairperson

Entry Date: 3-16-01

APPROVED AS TO FORM & CONTENT:


James W. Barlow, Esq.
Attorney for Jane Fritz

**STATE OF VERMONT
BOARD OF NURSING**

IN RE:

Jane Fritz

License No: 26-14458

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Docket No. NU62-0500

SPECIFICATION OF CHARGES

1. The Vermont Board of Nursing has jurisdiction to investigate and adjudicate allegations of unprofessional conduct committed by nurses and nursing assistants pursuant to 3 V.S.A. §§129, 129a; 26 V.S.A. §§1574, 1582, 1595 and 1598; the Board of Nursing's Rules and the Office of Professional Regulation's Rules.
2. Respondent Jane Fritz, of Bennington, Vermont, is a registered nurse, holding license number 26-14458, issued by the State of Vermont, since about October 16, 1981.
3. Upon information and belief, as of February 1, 1999, Respondent failed to file a Vermont Individual income tax return for the tax year 1997.
4. Upon information and belief, on or about February 1, 1999, Respondent was not in good standing within the meaning of 32 V.S.A. §3313, because of an unpaid joint income tax liability.
5. On or about February 1, 1999, Respondent prepared, signed and/or filed a Renewal Application with the Vermont Secretary of State, Office of Professional Regulation. On this application, Respondent indicated as follows:
 - a. "I hereby certify, under the pains and penalties of perjury, that I am in good standing with respect to or in full compliance with a plan to pay any and all taxes due to the State of Vermont as of the date of this application..."

b. "I certify that the information stated by me in this application is true and accurate to the best of my knowledge and that providing false information or omission of information is unlawful and may jeopardize my license/certification/registration status."

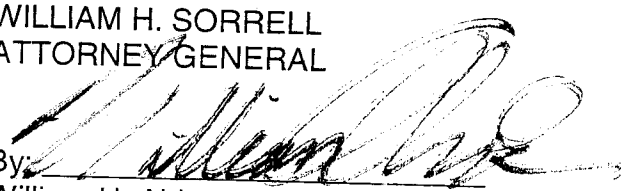
6. The above act(s), omission(s) and/or circumstance(s) violate: 26 VSA §1582(a)(1) (Has made or caused to be made a false, fraudulent or forged statement or representation in procuring or attempting to procure registration or renew a license to practice nursing); 3 V.S.A. §129a(a)(1) (Fraudulent or deceptive procurement or use of a license), and; 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).

WHEREFORE, the license of Jane Fritz should be revoked, denied or otherwise disciplined.

Dated at Montpelier, Vermont this 22ND day of February, 2001.

STATE OF VERMONT

WILLIAM H. SORRELL
ATTORNEY GENERAL

By: 
William H. Ahlers
Assistant Attorney General