

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

IN RE:

DORIS J. MORGAN

License No. 026-0034788

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Docket No. NU43-1007

STIPULATION AND CONSENT ORDER

STIPULATION

NOW COMES the State of Vermont, through State Prosecuting Attorney Edward G. Adrian, and the Respondent, Doris J. Morgan, R.N., 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 ("ARBN"); and the Rules of the Office of Professional Regulation.

Statement of Facts

2. Doris J. Morgan (the "Respondent") of Sacramento, California is licensed in the State of Vermont as a registered nurse under license number 026-0034788. This license was originally issued on or about October 24, 2006 and is currently set to expire on March 31, 2009.
3. On or about September 5, 2006, in response to the nursing license application question "[h]ave you been convicted of a crime other than a minor traffic violation", the Respondent answered "no". The Respondent was convicted of two counts of forgery in California, on or about April 29, 1986.
4. On or about May 23, 2007, the Respondent was reprimanded in the State of Arkansas for answering "no" to a similar question on an October 16, 2006 licensure application.
5. When questioned by State Investigator Mark Jacobs about this incident, the Respondent indicated that since the California Court had indicated that the physical record regarding her case was destroyed, she thought that her criminal record had been expunged. The Respondent indicated that the criminal matters arose out of a divorce where the Respondent's ex-spouse had emptied the bank accounts that the

STATE OF VERMONT



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Respondent then wrote a check against. Documentation from the Superior Court of California, Santa Clara does indicate that "our records reflect a complaint was filed, however, the file and docket have been destroyed pursuant to statute."

Charges

6. 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:
 - a. 3 V.S.A. § 129a(a)(1)(deceptive procurement of a license); and
 - b. 3 V.S.A. § 129a(a)(3) (failing to comply with the provisions of state statutes or rules governing the practice of the profession).

Understandings

7. 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.
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 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.

ORDER

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

- A. The Board of Nursing hereby **WARNS** the Respondent's license to practice registered nursing.

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- B. 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).
- C. 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: 7/15/08

STATE OF VERMONT
SECRETARY OF STATE

By: [Signature]
Edward G. Adrian
State Prosecuting Attorney

DORIS J. MORGAN
RESPONDENT

Dated: 7/1/08

By: Doris Morgan
Doris J. Morgan

APPROVED AND SO ORDERED:

VERMONT BOARD OF NURSING

Dated: 8/11/08

By: [Signature]
Chairperson

Date of Entry: 8/18/08

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