

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

IN RE:	)	
Kendra J. Patterson	)	Docket No. 2019-2
Application No. LI-297250	)	

STIPULATION AND CONSENT ORDER

STIPULATION

NOW COME the State of Vermont, by and through Prosecuting Attorney Aaron Kisicki, and applicant Kendra J. Patterson ("Applicant"), who stipulate and agree as follows:

Board Authority

1. The Vermont Board of Nursing ("Board") 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); 26 V.S.A. §1582; and the Rules of the Office of Professional Regulation.

Stipulated Facts

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

2. On November 14, 2018, Applicant submitted an application for licensure as a Registered Nurse in the State of Vermont.
3. Applicant answered "NO" to the application question, "Has Vermont or any other state, federal authority, or other jurisdiction taken any disciplinary action against (e.g. warned, reprimanded, fined, restricted, conditioned, suspended, revoked) a license, certificate, or registration that you hold or have held in any profession or occupation?"
4. The answer "NO" was false.
5. On September 28, 2005, Applicant's license to practice registered nursing was severely reprimanded, and Applicant was fined and ordered to complete certain course work by the Oklahoma Board of Nursing for admittedly presenting fraudulent documentation of Applicant's own tuberculosis testing results.

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
89 Main Street
3rd Floor
Montpelier, VT
05620-3402

Understandings

6. Applicant admits the facts as outlined above are true and the Board may find that the Applicant engaged in unprofessional conduct.
7. Applicant admits that the facts above are true and that the conditions below are necessary to protect the public.
8. 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.
9. Applicant specifically waives any claims that any disclosures made to the full Board during its review of this agreement have prejudiced Applicant's rights to a fair and impartial hearing in future hearings if this agreement is not accepted by the Board.
10. Applicant has read and reviewed this entire document and agrees that it contains the entire agreement between the parties.
11. Applicant is not under the influence of any drugs or alcohol at the time of signature of this Stipulation and Consent Order.
12. 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.
13. Applicant voluntarily waives the right to a contested hearing before the Board and waives any right to appeal from this Stipulation and Consent Order.
14. Applicant 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 hereby **WARNS** Applicant's license upon issuance.
- B. Notwithstanding any provision above, Applicant must continue to meet all requirements of the Vermont Board of Nursing 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 Applicant's licensing file and may be used for purposes of determining sanctions in any future disciplinary matter.

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
89 Main Street
3rd Floor
Montpelier, VT
05620-3402

AGREED TO:

Dated: 3/1/19

STATE OF VERMONT
SECRETARY OF STATE

By: [Signature]
Aaron Kisicki
Prosecuting Attorney
(802)828-1217
aaron.kisicki@sec.state.vt.us

KENDRA J. PATTERSON
APPLICANT

By: [Signature]
Kendra J. Patterson

APPROVED AND SO ORDERED:

Dated: 3-11-2019

By: [Signature]
Chairperson

Date of Entry: 3.12.2019

Subscribed and sworn to before me,
a Notary Public, in and for the State of
Oklahoma, County of Cleveland,
this 25 day of February, 2019
[Signature]
Notary Public
My Commission expires 11.8.22



Dated: 25 FEB 19

STATE OF VERMONT



Prosecuting Attorney
Office of
Professional Regulation
89 Main Street
3rd Floor
Montpelier, VT
05620-3402