

IN THE MATTER OF THE LICENSE OF:

ALLISON C. MORRIS, L.P.N.

LICENSE NO: 27055234A

**Indiana Professional
Licensing Agency**

The State of Indiana (“Petitioner”), by counsel, Deputy Attorney General Zanna C. Dyer, on behalf of the Office of the Indiana Attorney General, and pursuant to Ind. Code § 25-1-7-7, Ind. Code ch. 25-1-5, Ind. Code § 25-23-1-7, the Administrative Orders and Procedures Act, Ind. Code ch. 4-21.5-3, and Ind. Code ch. 25-1-9, files its Administrative Complaint against the Indiana nursing license of Allison C. Morris, L.P.N. (“Respondent”), and in support alleges and states the following:

1. Respondent's address filed with the Indiana State Board of Nursing ("Board") is P.O. Box 82, Kouts, Indiana 46346.

2. Respondent is a Licensed Practical Nurse ("L.P.N.") in the State of Indiana having been issued license number 27055234A by examination on February 4, 2005.

3. On or around January 25, 2016, Respondent was hired as an L.P.N. at Lincolnshire Health and Rehabilitation Center, located in Merrillville, Indiana. Respondent used the name "Allison C. Bachman" on her application and indicated that her license remained under the name "Allison C. Morris."

4. On September 16, 2015, Respondent was charged with and probable cause was found for Possession of Marijuana, a Class B Misdemeanor, in the Lowell Town Court under cause number 45I03-1509-CM-216.

5. On October 8, 2015, Respondent was charged with and probable cause was found for Criminal Trespass, a Class A Misdemeanor, and Disorderly Conduct, a Class B Misdemeanor, in the Lowell Town Court under cause number 45I03-1510-CM-239.

6. On December 10, 2015, Respondent submitted an Expired Licensed Practical Nurse renewal application to IPLA. Respondent answered "No" to question #3 which states, "Since you last renewed... have you been arrested, entered into a diversion agreement, been convicted of, pled guilty to, or pled nolo contendere to any offense, misdemeanor, or felony in any state?"

7. On May 4, 2016, Respondent signed a Pretrial Diversion Agreement which required payment of court costs in the amount of \$160 and \$110 Pretrial Diversion fee, no additional criminal offenses, and attend ten (10) NA meetings for cause number(s) 45I03-1509-CM-216 and 45I03-1510-CM-239.

8. On October 18, 2016, Respondent submitted an L.P.N. renewal application to IPLA. Respondent answered "No" to question #3 which states, "Since you last renewed... have you been arrested, entered into a diversion agreement, been convicted of, pled guilty to, or pled nolo contendere to any offense, misdemeanor, or felony in any state?"

9. On November 16, 2016, the Prosecuting Attorney filed a motion in the Lowell Town Court to resume prosecution because Respondent had failed to complete the ten (10) NA meetings.

10. On January 25, 2017, the Prosecuting Attorney filed a motion in the Lowell Town Court to recall the bench warrant and dismiss the cause due to Respondent's compliance.

VIOLATIONS

11. Respondent has violated Ind. Code § 25-1-9-4(a)(1)(A) in that Respondent has engaged in or knowingly cooperated in fraud or material deception in order to obtain a license to practice by failing to disclose her recent arrests on her 2015 Expired L.P.N. renewal application.

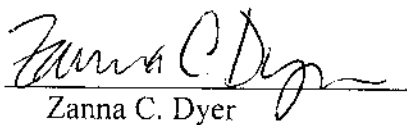
12. Respondent has violated Ind. Code § 25-1-9-4(a)(1)(A) in that Respondent has engaged in or knowingly cooperated in fraud or material deception in order to obtain a license to practice by failing to disclose that she entered into a diversion agreement on her 2016 L.P.N. renewal application.

ACCORDINGLY, Petitioner demands this Board enter an order finding that:

1. Respondent is subject to discipline according to I.C. 25-1-9;
2. Imposes an appropriate disciplinary sanction;
3. Directs the Respondent to immediately pay all cost incurred in the prosecution of this case; and
4. Provides any further relief that the Board deems just and proper.

Respectfully submitted,

Curtis T. Hill, Jr.,
Attorney General of Indiana
Atty. No.: 13999-20

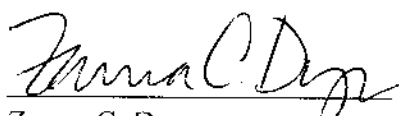
By: 
Zanna C. Dyer
Deputy Attorney General
Atty. No.: 31014-29

Indiana Office of the Attorney General
Licensing Enforcement and Homeowner Protection Unit
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Indianapolis, Indiana 46204-2770
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Fax Number (317) 233-4393
Email: claire.dyer@atg.in.gov

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing "Administrative Complaint" has been served upon the Respondent at the address listed below, by United States First Class Mail on this 26th day of June, 2018.

Allison C. Morris
P.O. Box 82
Kouts, Indiana 46346

By: 
Zanna C. Dyer
Deputy Attorney General

OFFICE OF THE INDIANA ATTORNEY GENERAL

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