

5. On November 13, 2012, Respondent was charged with Reckless Driving, a Class B Misdemeanor, under cause number 32D02-1304-CM-000492 in the Hendricks County Superior Court.

6. On October 29, 2013, with respect to the above mentioned cases, the following occurred:

- a. Respondent's charge for Battery was dismissed;
- b. Respondent pled guilty to the charge of Reckless Driving. Pursuant to Respondent's plea agreement, she was sentenced to one hundred eighty (180) days in jail, all suspended, and placed on one year of probation; and
- c. Respondent signed a Pre-Trial Diversion Agreement for the charge of Resisting Law Enforcement, the length of which was twelve (12) months. Pursuant to this agreement, if Respondent complied with its terms, the State agreed to dismiss its case against her.

7. On October 31, 2013, Respondent allowed her nursing license to expire.

8. On March 28, 2014, Respondent contacted IPLA expressing her desire to renew her nursing license.

9. On September 19, 2014, Respondent appeared in front of the Board for a Personal Appearance. Respondent informed the Board that she pled guilty to her charge for Reckless Driving and that she was currently on criminal probation, but that her charges for Battery and Resisting Law Enforcement were dismissed. Respondent knew this statement was false.

10. On September 29, 2014, the Board renewed Respondent's nursing license on indefinite probation based on the information provided by Respondent at her Personal Appearance. The terms of her probation required her to complete her criminal probation, keep

the Board apprised of her current address and employment information, submit a copy of the Board's Order signed by her employer within ten (10) days of employment, and to submit quarterly reports to the Board.

11. On October 14, 2014, Respondent submitted an e-mail to the Board requesting that the Board's September 29, 2014, Order be modified because the Order included information about her charges for Battery and Resisting Law Enforcement. Respondent further stated in her e-mail, that those charges had been dismissed.

12. In November 2014, Respondent requested that the probation be withdrawn from her nursing license.

13. On December 11, 2014, at the hearing concerning Respondent's request to withdraw probation, evidence was presented demonstrating that Respondent made repeated misrepresentations to the Board about the status of her criminal charges.

14. On December 29, 2014, the Board issued an Order pursuant to Indiana Code § 25-1-9-9(b) modifying the terms of Respondent's probation. The Order concludes that the misrepresentations to the Board by Respondent constitute changed circumstances warranting such a modification. The modified terms of Respondent's probation require Respondent to remain on indefinite probation and to refrain from performing any acts that constitute the practice of nursing in the State of Indiana.

VIOLATION

15. Respondent's conduct as described above constitutes a violation of Ind. Code § 25-1-9-4(a)(1)(A) in that Respondent has engaged in fraud or material deception in order to obtain a license to practice, as evidenced by her intentionally making repeated

misrepresentations to the Board about her criminal charges when she personally appeared before the board, and at her hearing regarding her motion to withdraw probation from her license.

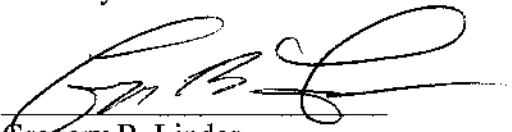
ACCORDINGLY, Petitioner demands an order against Respondent that:

1. Imposes the appropriate disciplinary sanction;
2. Directs Respondent to immediately pay all costs incurred in the prosecution of this case; and,
3. Provides any further relief as the Board deems just and proper.

Respectfully submitted,

GREGORY F. ZOELLER
Attorney General of Indiana
Attorney No. 1958-98

By:

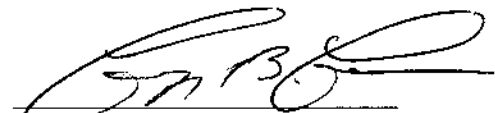

Gregory B. Linder
Deputy Attorney General
Attorney No. 31400-49

CERTIFICATE OF SERVICE

I certify that a copy of the "Administrative Complaint" has been duly served upon Respondent by United States mail, first-class, postage prepaid, and by e-mail, on this 24th day of April, 2015.

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By:



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