

BEFORE THE KANSAS STATE BOARD OF NURSING

Landon State Office Building, 900 S.W. Jackson #1051
Topeka, Kansas 66612-1230

FILED
MAR 23 2007

KSBN

IN THE MATTER OF
KAREN L. LANIGAN
License No. 13-065475-072

Case No. 05-1116

CONSENT AGREEMENT AND FINAL ORDER

NOW ON THIS 21st day of March, 2007, the Kansas State Board of Nursing, represented by Assistant Attorney General, Mark A. Knight, and the Respondent, Karen L. Lanigan, hereby enter into this agreement and proffer evidence and the hearing officer adopts those recommendations and makes the following findings of fact and orders:

AGREED FINDINGS OF FACT

1. Respondent is licensed to practice nursing in Kansas lapsed on or about 7/31/2006. Respondent submitted an application for reinstatement of her Kansas nursing license on or about 1/29/2007. The Kansas State Board of Nursing (Board) has jurisdiction over the Respondent and the subject matter of this action.
2. Respondent's address of record is 931 South Dahlia Street Apt 302, Denver, CO 80246.
3. The Respondent understands that pursuant to K.S.A. 77-515, respondent may be represented at respondent's expense by, an attorney during these proceedings.
4. After an investigation, the Board's investigative committee found reasonable grounds to believe that the respondent violated the Kansas Nurse Practice Act, K.S.A. 65-1120, and referred this matter for further proceedings.
5. The Kansas State Board of Nursing has the authority under K.S.A. 74-1106 et seq. to examine, license and renew license for duly qualified applicants and may limit, deny, suspend or revoke a license or authorization to practice nursing, may issue a public or private censure and levy administrative fines consistent with K.S.A. 74-1110, if a violation of K.S.A. 65-1120 is established.

6. (a) On or about February 7, 2005 while employed as a nurse as the MDS Coordinator for Prairie Mission Retirement Village, St. Paul, Kansas the licensee consumed some liquid morphine from a deceased patient's supply. On 2/9/2005 a urine drug screen on the licensee was positive for opiates and propoxyphene. The licensee admitted to the recreational use of crack cocaine and marijuana and alcohol in the past. She has been in treatment in the past for abusing Lortab and Xanax and Darvon.

(b) The licensee self-referred to [REDACTED] 10/18/2004. The licensee was noncompliant with the [REDACTED] requirements 2/14/2005 by not reporting her employment at Prairie Mission Retirement Center to [REDACTED] failing to return her [REDACTED] agreement, failure to return Compass Vision forms for Urine Analysis, failure to provide current phone number or contact information, and failure to report positive UAs of pre-employment screens. The licensee re-enrolled in [REDACTED] on 2/23/2005. [REDACTED] closed her case on 5/27/2005 for failure to respond to [REDACTED] correspondence of 5/10/2005 and 5/20/2005; failure to provide prescriptions for benzodiazepines; [REDACTED]

(c) On or about 8/30/2005 a petition was filed in the above captioned matter. A pre-hearing conference was set for 9/28/2005. Respondent did not appear for the pre-hearing conference. A default order suspending the respondent's license to practice nursing in Kansas was entered on 9/28/2005.

(d) [REDACTED]

(e) On or about 7/24/2006 respondent entered a consent agreement and final order in case number 05-111-6.

(f) On or about 7/31/2006 respondent's license to practice nursing in Kansas lapsed.

(g) On or about 1/29/2007 respondent submitted an application for reinstatement of

her Kansas nursing license.

7. The above incidents are violations of the nurse practice act. The Respondent agrees that the board is prepared to prove that respondent has violated: K.S.A. 65-1120(a)(6), unprofessional conduct, by drug diversion (K.A.R. 60-3-110(n); K.S.A. 65-1120(a)(1) to be guilty of fraud or deceit in practicing nursing; K.S.A. 65-1120(a)(4), to be unable to practice with skill and safety due to current abuse of drugs or alcohol; K.S.A. 65-1120(a)(6), unprofessional conduct by K.A.R. 60-3-110 (s) failing to complete the requirements of the impaired provider program of the board.

8. Respondent has the right to a hearing with evidence and witnesses and to seek review of the findings from that hearing in accordance with the Kansas Administrative Procedure Act and the Act for Judicial Review and Civil Enforcement of agency actions. Respondent is waiving those rights and voluntarily entering into this agreement instead of proceeding to such a hearing.

CONCLUSIONS OF LAW

9. The Kansas State Board of Nursing has the authority under K.S.A. 74-1106 et seq. to examine, license and renew license for duly qualified applicants and may limit, deny, suspend or revoke a license or authorization to practice nursing, may issue a public or private censure and levy administrative fines consistent with K.S.A. 74-1110, if a violation of K.S.A. 65-1120 is established.

10. Respondent has violated the Kansas Nurse Practice Act as follows:

Count 1: K.S.A. 65-1120(a)(6), unprofessional conduct, by drug diversion (K.A.R. 60-3-110(n).

Count 2: K.S.A. 65-1120(a)(1) to be guilty of fraud or deceit in practicing nursing.

Count 3: K.S.A. 65-1120(a)(4), to be unable to practice with skill and safety due to current abuse of drugs or alcohol.

Count 4: K.S.A. 65-1120(a)(6), unprofessional conduct by K.A.R. 60-3-110 (s) failing to complete the requirements of the impaired provider program of the board.

POLICY STATEMENT

11. The role of the Kansas State Board of Nursing is to protect citizens of Kansas.

DISPOSITION

12. By entering into this Consent Agreement and consenting to the entry of the Final Order, both parties waive their right to full administrative proceedings pursuant to K.S.A. 65-1120 and K.S.A.77-501 et seq. and to judicial review.

13. Upon the parties entering into this Consent Agreement and with the respondent having met all statutory requirements for reinstatement of respondent's Kansas Nursing license, the respondent's application for reinstatement of respondent's Kansas Nursing license will be granted.

14. Based upon this agreement, and pursuant to the disciplinary remedies available in K.S.A. 65-1120, the parties agree that this Consent Agreement will continue through any renewal periods of respondent's nursing license until respondent completes each of the conditions and requirements of this agreement. Further, the parties agree that in the event of a lapse of Respondent's nursing license, reinstatement of Respondent's nursing license shall be contingent upon this Consent Agreement and Final Order remaining in effect until Respondent completes each of the conditions and requirements of this agreement.

15. Based upon this agreement, and pursuant to the disciplinary remedies available in K.S.A. 65-1120, the parties agree that the Respondent's license to practice nursing in Kansas is immediately suspended. The suspension will be stayed as long as the requirements and conditions of this agreement are met.

16. Based upon this agreement, and pursuant to the disciplinary remedies available in K.S.A. 65-1120, the parties agree that the Respondent's license to practice nursing in Kansas is immediately limited. The limitations placed on the license and described below will remain in place until the requirements and conditions of this agreement are met or until the requirements and conditions of this agreement call for the modification of the limitations.

17. The Kansas State Board of Nursing will not take additional disciplinary action against respondent's nursing license for the violations stated above as long as respondent completes each of the following conditions and requirements:

(a) **Respondent shall return his or her current license card to the Board with this Consent Agreement. Respondent shall receive a license card which shall be issued with an "S" placed in the status code portion of the license card to indicate that the license is suspended with a Stay. The card will have an "L" indicating the limitations on the practice.**

(b) **Respondent will participate in and complete the reasonable recommendations and requirements of the [REDACTED]** sign releases of information necessary for [REDACTED] to evaluate and monitor respondent and for [REDACTED] to report information to the board. Respondent will be deemed to have completed the [REDACTED] program when [REDACTED] issues written notification that respondent has completed the program. Noncompliance with [REDACTED] is a violation of this agreement.

(c) **Respondent must submit to random drug screens as determined or selected by the Board or by [REDACTED].** The costs of the drug screens will be paid by the respondent. Respondent agrees that a Positive Drug Screen is a violation of this agreement.

(d) **Respondent shall have a narcotic key restriction on her license until such time as [REDACTED] determine her to be safe to practice nursing without a narcotic key restriction.** The narcotic key restriction prohibits the respondent from passing of narcotics, wasting of narcotics or having access to narcotics. The narcotic key restriction also prohibits

the respondent from supervising nurses or others that have access to narcotics. Respondent shall receive a license card which shall be issued with an "L" indicating limitations on the practice. Once [REDACTED] has provided written notice to the Board of its determination that respondent is safe to practice without a narcotic key restriction, and the respondent is compliant with all other conditions and requirements of this consent agreement, then the narcotic key restriction will be removed from respondent's nursing license.

(e) **Respondent shall immediately notify the Legal Division of any use of alcohol, if prohibited by [REDACTED] or controlled substances, or any violation of this Consent Agreement and Final Order.**

(f) **The respondent shall immediately inform all employers and prospective employers of this Consent Agreement and the Final Order.**

(g) **Respondent shall send a money order for \$70 to the Board upon entering into this agreement to pay the cost of this action.**

(h) Respondent shall **not violate the Kansas Nurse Practice Act** during the duration of this agreement.

(i) Respondent shall **not violate the laws of the United States, of State, or of any political subdivision of any State during the term of this agreement.** Traffic infractions shall not be considered violations of the law.

(j) **Licensee will Submit Reports from the Licensee's employer to the attention of the Legal Division, Kansas State Board of Nursing, Landon State Office Building, 900 S.W. Jackson, Suite 1051, Topeka, Kansas 66612-1230 on the following schedule:** Prior to Licensee securing employment that utilizes his or her nursing license, Licensee is to mail to the Kansas State Board of Nursing a statement indicating that Licensee has not yet secured employment which utilizes Licensee's nursing license. This statement is due by the 10th day of each month beginning the next month after signing this consent agreement. Once Licensee is employed in a position that utilizes his or her nursing license, or if Licensee is currently

employed in a position that utilizes his or her nursing license, a nursing performance report is due by the 10th day of every third Month until Licensee has caused the submission of four (4) separate nursing performance reports. The report shall be prepared and signed by Licensee's immediate supervisor or by an R.N. who evaluates Licensee's performance on a regular basis and be based on the following guidelines: (1) Incorporation of information on facility letterhead stationary is preferred. (2) Letter format is acceptable, with the date of the report identified. (3) Evaluator's name, telephone number, address, license number and nursing credentials. (4) Licensee's name, address, telephone number, license number. (5) A short explanation of the Licensee's work performance in the following areas: (a) Standards met regarding facility policies and procedures. (b) Compliance with the Kansas Nurse Practice Act. (c) Supervisor evaluations. (d) Overall appropriateness. (e) Interactions with patients. (f) Interactions with staff and administration.

(k) **Respondent agrees to notify the Legal Division of any changes in address and phone number as well as all employment terminations or employer changes or additions.** All such notifications shall be made in writing within fourteen (14) days of such a change.

18. Respondent is responsible for the costs related to satisfying these conditions and requirements.

19. If Respondent does not meet these conditions and requirements, the Kansas State Board of Nursing may request additional sanctions against Respondent's license or application for a license. Respondent would be sent notice of such action and would be entitled to a hearing as to whether Respondent had complied with this Consent Agreement, but Respondent could not contest the violations listed in this agreement.

20. All parties understand that if an action based on failure to meet the conditions and requirements of this Consent Agreement is filed, K.S.A. 77-531 requires the Notice of Hearing to be served upon the Respondent and the Respondent's attorney of record, if any. All parties

agree that only serving the Notice of Hearing upon the Respondent will be proper service and it is the Respondent's responsibility to contact his or her attorney, if any, in reference to the action.

21. Respondent acknowledges and agrees that upon a finding of Respondent not complying with the conditions or requirements of this Consent Agreement, the Stay of Suspension of Respondent's license to practice nursing in the State of Kansas, shall be lifted. Respondent will not be allowed to practice nursing in the state of Kansas during the period the Stay is lifted.

22. The Board will inactivate this case file once respondent satisfies this agreement. This agreement does not prohibit the agency from taking disciplinary action against Respondent's license for any additional or cumulative violation of the Kansas Nurse Practice Act committed by the Respondent before or after this agreement is entered into.

23. This agreement is a discipline and must be reported on any future renewal or reinstatement applications. This agreement is a contract entered into by the parties to resolve an investigative case. The original of this agreement shall be placed in the Agency Record and is a public record.

24. By signing this Consent Agreement and Final Order, Respondent acknowledges that Respondent has read and understands the entire document, and agrees to be bound by its terms. This Consent Agreement and Final Order constitute the entire agreement of the parties and may not be modified except in writing and approved by all parties.

25. After successful completion of all of the conditions and requirements of this Consent Agreement by the respondent, the Consent Agreement will be satisfied and the case will be inactivated.

26. This agreement supersedes the Consent Agreement and Final Order entered into by the parties on July 24, 2006.

27. The hearing/presiding officer whose signature appears below has been designated pursuant to K.S.A. 77-514 and K.S.A. 77-526 to act on behalf of the Board/agency head and to

hear discipline cases on behalf of the Board/agency head and to render either initial orders or final orders, if by agreement of both parties, in those discipline cases.

IN WITNESS WHEREOF, the parties hereto execute this CONSENT AGREEMENT AND FINAL ORDER.

~~IT IS~~ SO ORDERED.

Karen L. Lanigan
Respondent
314 S. 35th Street
Parsons, KS 67357

Karen L. Lanigan must sign before a Notary Public.

State of ~~Kansas~~ Colorado County of ~~Wagoner~~ Adair ss.
SUBSCRIBED AND SWORN TO before, me by Karen L. Lanigan

on this 1st day of March, 2007.

Signature of Notary Public

My Commission Expires 07/14/2008
My Commission Expires 830 S. Colorado Blvd.
(Notary Public Seal)
Glendale, CO 80246

Mark A. Knight, #12163
Assistant Attorney General
Landon State Office Building
900 SW Jackson #1051
Topeka, KS 66612-1230

Terry E. Beck, Hearing Officer

CERTIFICATE OF SERVICE

On the 23rd day of March, 2007, I mailed a copy of this CONSENT
AGREEMENT AND FINAL ORDER to:

Karen L. Lanigan
314 S. 35th Street
Parsons, KS 67357

Mark A. Knight, #12183
Assistant Attorney General
Landon State Office Building
900 SW Jackson #1051
Topeka, KS 66612-1230

BEFORE THE KANSAS STATE BOARD OF NURSING

Landon State Office Building, 900 S.W. Jackson #1051
Topeka, Kansas 66612-1230

FILED

JUL 25 2006

**IN THE MATTER OF
KAREN L. LANIGAN
License No. 13-065475-072**

Case No. 05-1116

KSBN

CONSENT AGREEMENT AND FINAL ORDER

NOW ON THIS 24th day of July, 2006, the Kansas State Board of Nursing, represented by Assistant Attorney General, Mark A. Knight, and the Respondent, Karen L. Lanigan, hereby enter into this agreement and proffer evidence and the hearing officer adopts those recommendations and makes the following findings of fact and orders:

AGREED FINDINGS OF FACT

1. Respondent is licensed to practice nursing in Kansas as a registered nurse through 7/31/2006. The Kansas State Board of Nursing (Board) has jurisdiction over the Respondent and the subject matter of this action.
2. Respondent's address of record is 314 S. 35th Street, Parsons, KS 67357.
3. The Respondent understands that pursuant to K.S.A. 77-515, respondent may be represented at respondent's expense by, an attorney during these proceedings.
4. After an investigation, the Board's investigative committee found reasonable grounds to believe that the respondent violated the Kansas Nurse Practice Act, K.S.A. 65-1120, and referred this matter for further proceedings.
5. The Kansas State Board of Nursing has the authority under K.S.A. 74-1106 et seq. to examine, license and renew license for duly qualified applicants and may limit, deny, suspend or revoke a license or authorization to practice nursing, may issue a public or private censure and levy administrative fines consistent with K.S.A. 74-1110, if a violation of K.S.A. 65-1120(a) is established.
6. (a) On or about February 7, 2005 while employed as a nurse as the MDS Coordinator for Prairie Mission Retirement Village, St. Paul, Kansas the licensee consumed

some liquid morphine from a deceased patient's supply. On 2/9/2005 a urine drug screen on the licensee was positive for opiates and propoxyphene. The licensee admitted to the recreational use of crack cocaine and marijuana and alcohol in the past. She has been in treatment in the past for abusing Lortab and Xanax and Darvon.

(b) The licensee self-referred to [REDACTED] 10/18/2004. The licensee was noncompliant with the [REDACTED] requirements 2/14/2005 by not reporting her employment at Prairie Mission Retirement Center to [REDACTED] failing to return her [REDACTED] agreement, failure to return Compass Vision forms for Urine Analysis, failure to provide current phone number or contact information, and failure to report positive UAs of pre-employment screens. The licensee re-enrolled in [REDACTED] on 2/23/2005. [REDACTED] closed her case on 5/27/2005 for failure to respond to [REDACTED] correspondence of 5/10/2005 and 5/20/2005; failure to provide prescriptions for benzodiazepines [REDACTED]

(c) On or about 8/30/2005 a petition was filed in the above captioned matter. A pre-hearing conference was set for 9/28/2005. Respondent did not appear for the pre-hearing conference. A default order suspending the respondent's license to practice nursing in Kansas was entered on 9/28/2005.

(d) [REDACTED]

7. The above incidents are violations of the nurse practice act. The respondent agrees that the board is prepared to prove that respondent has violated:

K.S.A. 65-1120(a)(4) to be unable to practice with skill and safety due to current abuse of drugs or alcohol; respondent has violated K.A.R.60-3-110(r) failing to comply with any disciplinary

order of the Board; and respondent has violated K.A.R. 60-3-110(s) failing to complete the requirements of the impaired provider program of the Board.

8. Respondent has the right to a hearing with evidence and witnesses and to seek review of the findings from that hearing in accordance with the Kansas Administrative Procedure Act and the Act for Judicial Review and Civil Enforcement of agency actions. Respondent is waiving those rights and voluntarily entering into this agreement instead of proceeding to such a hearing.

CONCLUSIONS OF LAW

9. The Kansas State Board of Nursing has the authority under K.S.A. 74-1106 et seq. to examine, license and renew license for duly qualified applicants and may limit, deny, suspend or revoke a license or authorization to practice nursing, may issue a public or private censure and levy administrative fines consistent with K.S.A. 74-1110, if a violation of K.S.A. 65-1120(a) is established.

10. Respondent has violated the Kansas Nurse Practice Act as follows:

Count 1: K.S.A. 65-1120(a)(6), unprofessional conduct, by drug diversion (K.A.R. 60-3-110(n)

Count 2: K.S.A. 65-1120(a)(1) to be guilty of fraud or deceit in practicing nursing.

Count 3: K.S.A. 65-1120(a)(4), to be unable to practice with skill and safety due to current abuse of drugs or alcohol.

Count 4: K.S.A. 65-1120(a)(6), unprofessional conduct by K.A.R. 60-3-110 (s) failing to complete the requirements of the impaired provider program of the board.

POLICY STATEMENT

11. The role of the Kansas State Board of Nursing is to protect citizens of Kansas.

DISPOSITION

12. By entering into this Consent Agreement and consenting to the entry of the Final Order, both parties waive their right to full administrative proceedings pursuant to K.S.A. 65-1120(b) and K.S.A.77-501 et seq. and to judicial review.

13. Based upon this agreement, and pursuant to the disciplinary remedies available in K.S.A. 65-1120, the parties agree that this Consent Agreement will continue through any renewal periods of respondent's nursing license until respondent completes each of the conditions and requirements of this agreement.

(a) Respondent shall **receive a license card which shall be issued with an "S" placed in the status code portion of the license card to indicate that the license is suspended.** The suspension will be stayed as long as requirements within this agreement are met. **The card will have an "L" indicating the limitations on the practice.**

(b) Respondent shall have a **narcotic key restriction on her license** until such time as [REDACTED] determine her to be safe to practice nursing without a narcotic key restriction. The narcotic key restriction prohibits the respondent from passing of narcotics, wasting of narcotics or having access to narcotics. The narcotic key restriction also prohibits the respondent from supervising nurses or others that have access to narcotics. Respondent shall receive a license card which shall be issued with an "L" indicating limitations on the practice. Once [REDACTED] has provided written notice to the Board of its determination that respondent is safe to practice without a narcotic key restriction, and the respondent is compliant with all other conditions and requirements of this consent agreement, then the narcotic key restriction will be removed from respondent's nursing license.

(c) Respondent **will participate in and complete the reasonable recommendations and requirements of the [REDACTED]** sign releases of information necessary for [REDACTED] to evaluate and monitor respondent and for [REDACTED] to report information to the board. Respondent will be deemed to have completed the

██████████ program when ██████████ issues written notification that respondent has completed the program. Noncompliance with ██████████ is a violation of this agreement.

(d) Respondent **must submit to random drug screens as** determined or selected by the Board or ██████████. The costs of the drug screens will be paid by the respondent. Respondent agrees that a Positive Drug Screen is a violation of this agreement.

(e) Respondent **shall immediately notify the Legal Division of any use of alcohol, if prohibited by ██████████ or controlled substances, or any violation of this Consent Agreement and Final Order.**

(f) The respondent **shall immediately inform all employers and prospective employers of this Consent Agreement and the Final Order.**

(g) Respondent **shall send a money order for \$140 to the Board upon** entering into this agreement to pay the cost of this action and the cost of previous action.

(h) Respondent shall not violate the Kansas Nurse Practice Act during the duration of this agreement.

(i) Respondent shall not violate the laws of the United States, of State, or of any political subdivision of any State during the term of this agreement. Traffic infractions shall not be considered violations of the law.

(j) Respondent will **Submit Reports from the respondent's employer to the attention of the Legal Division, Kansas State Board of Nursing**, Landon State Office Building, 900 S.W. Jackson, Suite 1051, Topeka, Kansas 66612-1230 on the following schedule: Prior to respondent securing employment that utilizes respondent's nursing license, respondent is to mail to the Kansas State Board of Nursing a statement indicating that respondent has not yet secured employment which utilizes respondent's nursing license. This statement is due by the 10th day of each month beginning the next month after signing this consent agreement.

Once respondent is employed in a position that utilizes respondent's nursing license, or if respondent is currently employed in a position that utilizes respondent's nursing license, a nursing performance report is due by the 10th day of every third month until respondent has caused the submission of four (4) separate nursing performance reports. The report shall be prepared and signed by respondent's immediate supervisor or by an R.N. who evaluates respondent's performance on a regular basis and be based on the following guidelines:

1. Incorporation of information on facility letterhead stationary is preferred.
2. Letter format is acceptable, with the date of the report identified.
3. Evaluator's name, telephone number, address, license number and nursing credentials.
4. Respondent's name, address, telephone number, license number.
5. A short explanation of the respondent's work performance in the following areas.
 - a. standards met regarding facility policies and procedures
 - b. compliance with the Kansas Nurse Practice Act
 - c. supervisor evaluations
 - d. overall appropriateness
 - e. interactions with patients
 - f. interactions with staff and administration

(k) Respondent agrees to **notify the Legal Division of any changes in address and phone number as well as all employment terminations or employer changes or additions.** All such notifications shall be made in writing within fourteen (14) days of such a change.

(l) Respondent is responsible for the costs related to satisfying these conditions and requirements.

14. If respondent does not meet these requirements, then Kansas State Board of Nursing may request additional sanctions against respondent's license or application for a license including but not limited to lifting the stay of suspension on respondent's license. Respondent would be sent notice of such action and would be entitled to a hearing as to whether respondent had complied with this agreement, but respondent could not contest the violations listed in this agreement.

15. The Board will inactivate this case file once respondent satisfies this agreement. This agreement does not prohibit the agency from taking disciplinary action against respondent's license for any additional or cumulative violation of the Nurse Practice Act committed by the respondent before or after this agreement is entered into.

16. This agreement is a contract entered into by the parties to resolve a suspension case. The original of this agreement shall be placed in the Agency Record and is a public record.

17. By signing this Consent Agreement, respondent acknowledges that respondent has read and understands the entire document, and agrees to be bound by its terms. This Consent Agreement constitutes the entire agreement of the parties and may not be modified except in writing and approved by all parties.

18. After successful completion of all of the requirements of this Consent Agreement by the respondent, the Consent Agreement will be satisfied and the case will be inactivated.

IN WITNESS WHEREOF, the parties hereto execute this CONSENT AGREEMENT AND FINAL ORDER.

IT IS SO ORDERED.

X
Karen L. Lanigan
Respondent
314 S. 35th Street
Parsons, KS 67357

U
*Karen L. Lanigan must sign before a Notary Public.

State of Kansas, County of Labette ss.

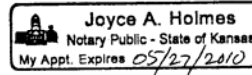
SUBSCRIBED AND SWORN TO before, me by Karen L. Lanigan

on this 17th day of July, 2006.

Joyce A. Holmes
Signature of Notary Public

My Commission Expires 05-27-2010
(Notary Public Seal)

Mark A. Knight, #12183
Assistant Attorney General
Landon State Office Building
900 SW Jackson #1051
Topeka, KS 66612-1230



Terry E. Beck, Hearing Officer

CERTIFICATE OF SERVICE

On the 24th day of July, 2006, I mailed a copy of this CONSENT AGREEMENT AND FINAL ORDER to:

Karen L. Lanigan
314 S. 35th Street
Parsons, KS 67357

Mark A. Knight, #12183
Assistant Attorney General