

**BEFORE THE KANSAS STATE BOARD OF NURSING**

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

**IN THE MATTER OF  
LISA B. ANDERSON  
License No. 14-106058-111**

**FILED**

**JUL 26 2011**

**KSBN**

**Case No. 09-1048-0, 08-659-0**

**PROPOSED DEFAULT ORDER TO REVOKE LICENSE**

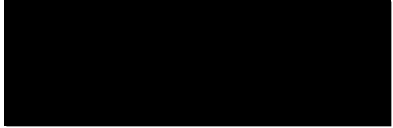
NOW ON THIS 26<sup>th</sup> day of July, 2011, Petitioner, the Kansas State Board of Nursing, appears by disciplinary counsel, Danielle R. Sanger, for a Pre-Hearing on the Petition. Respondent does not appear in person or by phone.

Wherefore, the Presiding Officer finds as follows:

1. Respondent is licensed to practice nursing in Kansas through 11/30/2011. The Kansas State Board of Nursing has jurisdiction over the Respondent and the subject matter of this action.
2. Respondent was sent a copy of the Petition and Notice of Hearing to Respondent's last known address of record and service is proper. Respondent does not appear.
3. Petitioner moves for issuance of a proposed default order revoking Respondent's license. The Petitioner's request is granted by default pursuant to K.S.A. 77-520.
4. The Petition is hereby granted and incorporated into this order as if fully set forth herein. Respondent violated the Nurse Practice Act as alleged in the Petition.
5. Per Petitioner's request, Respondent's license to practice nursing is revoked. Respondent may not practice nursing in Kansas.
6. Costs of the action of \$70 are assessed to Respondent to be paid to the Board by cashier's check or money order within 30 days of the effective date of this order.
7. Respondent shall immediately forward his or her original Kansas nursing license to the Kansas State Board of Nursing.

8. This Proposed Default Order shall become effective seven days after service, or ten days after mailing, of this order unless the Respondent files a written motion with the Board stating why the Proposed Default Order should be vacated and the order is then vacated.
9. Disciplinary counsel shall mail a copy of this proposed default order to Respondent's last known address of record.

**IT IS SO ORDERED.**



Sandra L. Sharon, Presiding Officer  
Office of Administrative Hearings  
1020 S Kansas Ave.  
Topeka, KS 66612-1327

**NOTICE**

Pursuant to K.S.A. 77-520, a party against whom a proposed default order is issued may file a written motion to vacate the order. A motion to vacate the proposed default order must be timely filed within 7 days following service of the proposed default order. If no timely motion to vacate the proposed default order is received and granted, the proposed default order becomes final without further proceedings or notice in 30 days after the service of the proposed default order.

Pursuant to K.S.A. 77-531, if served by mail, three days are added to the time limits set out above.



Danielle R. Sanger, #24587  
Disciplinary Counsel  
Kansas State Board of Nursing  
900 S.W. Jackson, Suite #1051  
Topeka, KS 66612-1230  
785-296-4325

CERTIFICATE OF SERVICE

I certify that on the 26<sup>th</sup> day of July 2011, a true and correct copy of the foregoing Proposed Default Order Revoking License was deposited in the United States Mail, first-class postage prepaid, addressed to the following:

Lisa Anderson  
909 Pilot Church Rd  
Pinnacle NC 27043



Danielle R. Sanger, #24587  
Assistant Attorney General

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**PETITION**

COMES NOW the Petitioner, the Kansas State Board of Nursing, by and through Assistant Attorney General assigned to the Board, Danielle R. Sanger, and for its cause of action states that:

1. Respondent, Lisa B. Anderson, is licensed to practice nursing in Kansas through 11/30/2011. The Board has jurisdiction over the Respondent and the subject matter of this action.
2. Respondent's address of record is 909 Pilot Church Rd., Pinnacle NC 27043.
3. 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.
4. 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.

**FACTS COMMON TO ALL COUNTS**

5. The facts below are common to all counts:

- a. On or about 09/2008, Respondent was initially licensed as an RN in the state of Kansas. Per her initial application, Respondent was convicted of a misdemeanor in approximately 1983, and her driver's license had been suspended.
- b. On or about 11/19/2009, Respondent submitted a renewal application to practice nursing in the state of Kansas.
- c. On her renewal application, Respondent answered "No" to the questions regarding whether she had ever been convicted of a misdemeanor and whether she had disciplinary action taken against any license.
- d. In a letter dated 11/4/2010, Respondent was informed that she had answered "No" to the questions regarding whether she had ever been convicted of a misdemeanor and whether she had disciplinary action taken against any license. Respondent was informed that she needed to contact the Board by 11/17/2010 if she wanted to complete a two (2) hour CNE on the Kansas Nurse Practice Act instead of facing possible disciplinary action.
- e. To date, Respondent has not submitted the original certificate of completion for the two (2) hour CNE on the Kansas Nurse Practice Act.

#### VIOLATIONS


6. Respondent has violated the Kansas Nurse Practice Act as follows:
  - a. Count 1: K.S.A. 65-1120(a)(1), to be guilty of fraud or deceit in procuring or attempting to procure a license to practice nursing.
  - b. Count 2: K.S.A. 65-1120(a)(6), to be guilty of unprofessional conduct as defined by rules and regulations of the board, by KAR 60-3-110(t), failing to furnish the board, its investigators, or its representatives with any information legally requested by the board.

WHEREFORE, Petitioner requests a finding that the Respondent has violated the Nurse Practice Act, that Respondent's license to practice nursing in Kansas be revoked, and that costs of this action be assessed to the respondent in the amount of \$70.00.

Respectfully submitted,

Derek Schmidt,  
Kansas Attorney General

By:

  
Danielle R. Sanger #24587  
Assistant Attorney General  
Kansas State Board of Nursing  
Landon State Office Building  
900 SW Jackson #1051  
Topeka, KS 66612