### BEFORE THE KANSAS STATE BOARD OF NURSING

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

IN THE MATTER OF KARRI L. ADAMSON License No. 23-30145-071

Case No. 09-676-6, 06-588-0

FILED
JUL 2 6 2011
KSBN

## PROPOSED DEFAULT ORDER TO REVOKE LICENSE

NOW ON THIS day of 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:

- Respondent is licensed to practice nursing in Kansas through 7/31/2011. The Kansas State Board of Nursing has jurisdiction over the Respondent and the subject matter of this action.
- 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.
- 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.
- 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.
- 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.
- 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.
- 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 day of _		_2011, a true and	
of the foregoing Proposed Default Order Rev	oking License was	deposited in the	United States
Mail, first-class postage prepaid, addressed to	the following:		

Karri Adamson 13029 SW 106<sup>th</sup> Rose Hill KS 67133

> 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:

- Respondent, Karri L. Adamson, is licensed to practice nursing in Kansas through 07/31/2011. The Board has jurisdiction over the Respondent and the subject matter of this action.
- 2. Respondent's address of record is 13029 SW 160<sup>th</sup>, Rose Hill KS 67133.
- 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 02/1997, Respondent was convicted of driving on a suspended driver's license/no proof of car insurance.

- b. On Respondent's initial LPN application, 2001 renewal, 2003 renewal, 2005 renewal, Respondent failed to report her misdemeanor conviction and suspension of her driver's license.
- c. On or about 5/16/2006, Respondent's Arizona LPN license was revoked.
- d. In a letter dated 8/22/2006, Respondent was informed by the Board that a criminal background check revealed a 1997 misdemeanor conviction and driver's license suspension that had not been reported as required on her initial application and subsequent renewal applications.
- e. On or about 7/26/2009, Respondent submitted a renewal application to practice nursing in the state of Kansas.
- f. On her renewal application, Respondent answered "No" to the question regarding whether she had ever been convicted of a misdemeanor.
- g. In letters dated 9/1/2010 and 9/27/2010, Respondent was informed that she had answered "No" to the question regarding whether she had ever been convicted of a misdemeanor on her 2009 renewal application, and Respondent needed to contact the Board at her earliest convenience.
- h. To date, Respondent has not contacted the Board.

#### **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