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BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against: **LISA MARIE GUILLOT** **743 39th Street** **Sacramento, California 95816** **Registered Nurse License No. 676564** Respondent.	Case No. 2011-283 **ACCUSATION**

Complainant alleges:

PARTIES

1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her official capacity as the Interim Executive Officer of the Board of Registered Nursing, Department of Consumer Affairs.

2. On or about March 27, 2006, the Board of Registered Nursing issued Registered Nurse License Number 676564 to Lisa Marie Guillot (Respondent). The Registered Nurse License was in full force and effect at all times relevant to the charges brought in this Accusation and will expire on August 31, 2011, unless renewed.

JURISDICTION

3. This Accusation is brought before the Board of Registered Nursing (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

4. Section 2750 of the Business and Professions Code (Code) provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

5. Section 2764 of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811(b) of the Code, the Board may renew an expired license at any time within eight years after the expiration.

6. Section 118(b) of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated.

STATUTORY/REGULATORY PROVISIONS

7. Section 2761 of the Code states:

"The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

"(a) Unprofessional conduct, which includes, but is not limited to, the following:

. . .

"(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional."

COST RECOVERY

8. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

CAUSE FOR DISCIPLINE

(Unprofessional Conduct – Out of State Discipline)
(Bus. & Prof. Code §2761(a)(4))

9. Respondent has subjected her registered nurse license to disciplinary action under Code section 2761(a)(4) in that on or about September 27, 2006, the Louisiana State Board of Nursing (Louisiana Board) suspended Respondent's license for a minimum of six months.

10. The underlying conduct supporting the Louisiana Board's disciplinary action is that on or about September 26, 2006, the Louisiana Board was notified that Respondent was not in compliance with the stipulations of the Recovering Nurse Program (RNP). In a letter dated September 8, 2006, Respondent was advised of her failure to comply with the stipulations of the RNP. Specifically, Respondent had failed to submit numerous urine drug screen results from October 2005 through August 2006. Additionally, Respondent failed to submit Group Facilitator Reports for the months of August 2005 to August 2006. Respondent also failed to submit psychiatric follow-up evaluations for the months of September 2005, December 2005, March 2006, and June 2006. Finally, Respondent failed to submit Verification Calendar Reports for August 2005 and August 2006. The letter to Respondent dated September 8, 2006, requested that she respond within 10 days, however Respondent failed to do so. The Louisiana Board suspended Respondent's registered nurse license pursuant to a Board Agreement providing that Respondent's failure to comply with the stipulations of the RNP would result in immediate suspension of her license.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters alleged in this Accusation, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Revoking or suspending Registered Nurse License Number 676564, issued to Lisa Marie Guillot;

2. Ordering Lisa Marie Guillot to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

3. Taking such other and further action as deemed necessary and proper.

DATED: October 4, 2010

for LOUISE R. BAILEY, M.ED., RN
Interim Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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