The attached are Primary Source Documents of the Idaho Board of Nursing for:

CONNIE STAPLETON COLVIN
N-25466

Idaho Board of Nursing – PO Box 83720 – Boise, Idaho 83720-0061 – (208) 334-3110
BEFORE THE BOARD OF NURSING  
STATE OF IDAHO

In the Matter of:  
CONNIE SUE STAPLETON,  
License No. N-25466,  
Respondent.  

Case No. BON-98-07  
FINDINGS OF FACT,  
CONCLUSIONS OF LAW,  
AND ORDER

FINDINGS OF FACT

1. The Idaho Board of Nursing (hereinafter “Board”) issued Respondent a license to practice nursing, numbered N-25466, on February 5, 1996.

2. On or about February 2, 1998, Respondent pled guilty to the felony offense of grand theft. In entering her plea, Respondent admitted that she, while employed as a registered nurse at Latah Health Center in Moscow, Idaho, had stolen money from the bank account belonging to a resident of that Center. On April 17, 1998, a Withheld Judgment was entered against Respondent. (Exhibit 3 to this proceeding.)

3. On May 5, 1998 a Complaint (Exhibit 1 to this proceeding) against Respondent was issued by the Board. The Complaint sought the imposition of a disciplinary sanction against Respondent.

4. A notice of show cause hearing was sent to the Respondent on July 6, 1998. The hearing was scheduled for August 27, 1998 before the members of the Board.

5. At the hearing, the State introduced evidence and testimony corroborating the facts that provided the basis for the criminal charges and Respondent’s subsequent guilty plea. This evidence included the testimony of Simmone deGlee, Associate Executive Director of the
Board, regarding the results of her investigation into allegations of Respondent’s misconduct. The evidence also included documentation of the allegations and supporting facts (Exhibits 4, 5, and 6 to this proceeding).

6. The Board also heard the telephonic testimony of the victim of the crime, Shirley Jackle. Witness Jackle testified about the financial impact of the Respondent’s actions and gave the members of the Board her opinion as to an appropriate punishment for Respondent.

7. Respondent appeared at the hearing and testified in her own defense. Acknowledging entry of the guilty plea and admitting to the criminal conduct, Respondent offered the members of the Board an explanation of her mental state and personal situation at the time of the theft.

CONCLUSIONS OF LAW

1. Conviction of a felony for an offense involving moral turpitude is a violation of the Nursing Practices Act (hereinafter “Act”) and the rules and standards of conduct and practice adopted by the Board. Idaho Code § 54-1413(1) and (1)(c); IDAPA 23.01.01.100.02 and .04.

2. Engaging in conduct likely to defraud patients is a violation of the Act and the rules and standards of conduct and practice adopted by the Board. Idaho Code § 54-1413(1) and (1)(h).

3. Violation of the provisions of the Act or the rules and standards of conduct and practice adopted by the Board constitutes grounds for discipline, including revocation of a nursing license. Idaho Code § 54-1413(1)(g).

4. Respondent violated the Act by being convicted of a felony, committing an offense involving moral turpitude, and engaging in conduct likely to defraud a patient. These violations of
the Act and the rules and standards of conduct and practice adopted by the Board are grounds for
the imposition of discipline, including revocation of Respondent’s nursing license.

ORDER

The above-entitled matter being submitted to the Board of Nursing, State of Idaho, and
the matters therein being fully considered by the Board, and there appearing good cause,
therefore:

IT IS HEREBY ORDERED, that the practical nurse license of Connie Sue Stapleton,
number N-25466, be hereby revoked and is subject to subsequent review as authorized by Idaho
Code § 54-1413(3).

BE IT FURTHER ORDERED that, should Connie Sue Stapleton petition for
reinstatement of licensure in the future, that she present documentation of her rehabilitation and
competence to practice, including but not limited to, a detailed summary of her employment since
licensure revocation.

DATED THIS 28th day of September, 1998.

__________________________
CHARLES MOSELEY, R.N., CRNA
Chairman
Idaho Board of Nursing
BEFORE THE BOARD OF NURSING
STATE OF IDAHO

In the Matter of: CONNIE SUE STAPLETON, License No. N-25466,
Respondent. Case No. BON-98-07

CORRECTION ORDER

The Board of Nursing, State of Idaho, rendered Findings of Fact, Conclusions of Law and a Final Order in this matter on September 29, 1998. By virtue of the provisions of the Final Order, Respondent's License No. N-25466 was revoked.

Subsequent review of that order revealed an error in identification of the type of license that was revoked. The Final Order indicates that Respondent's License No. N-25466 is a "practical" nurse license. In fact, Respondent's License No. N-25466 is a "professional" nurse license.

Based on its review of the Board of Nursing licensing files pertaining to Respondent's License No. N-25466, and good cause appearing therefore,

IT IS HEREBY ORDERED, that the Findings of Fact, Conclusions of Law and Order previously entered be amended to correct the error in designation of type of license by providing that the Board of Nursing's previous order of revocation of Respondent's License No. N-25466, constitutes a revocation of Respondent's professional nurse license.

IT IS FURTHER ORDERED, that this clerical correction will not alter or otherwise impact the effective date of the Findings of Fact, Conclusions of Law and Final Order previously entered in this case.

DATED this 8th day of October, 1998.

Charles Moseley, R.N., CRNA
Chairman

ORDER - 1
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 20th day of October, 1998, I caused to be served a true and correct copy of the foregoing by placing a copy thereof in the United States Mail, postage prepaid, addressed to:

Connie Sue Stapleton
607 N. Almon, #3007
Moscow, ID 83843

[Signature]

Simonne deGlee
Associate Executive Director
BEFORE THE IDAHO STATE BOARD OF NURSING

In the matter of a license of:               Case No. BON-98-07

CONNIE SUE STAPLETON, License No. N-25466, COMPLAINT
Respondent.

To: Connie Sue Stapleton
609 N. Almon #3007
Moscow, ID 83843

STATEMENT OF CHARGES

1.

The Idaho State Board of Nursing (hereafter the "Board") is empowered by Idaho Code § 54-1404 to regulate the practice of nursing in the State of Idaho.

2.

Connie Sue Stapleton (hereinafter "Respondent"), is licensed by the Idaho State Board of Nursing under License No. N-25466 to engage in the practice of professional nursing.

3.

On January 16, 1998, a criminal complaint was filed against Respondent in the Idaho Second Judicial District for Latah County Case No. CR-98-00083 alleging that, during a period of time from December 29, 1997, to January 7, 1998, while Respondent was employed as a nurse by the Latah Health Center in Moscow, Idaho, she did willfully, feloniously and as a continuous course of conduct take or obtain property belonging to a resident patient of the Latah Health Center, with the intent to deprive the owner thereof. Respondent pled guilty to the felony offense of grand theft in violation of Idaho Code
§§ 18-2403, 18-2407 and 18-2408, and on or about April 17, 1998 a Withheld Judgment was entered against her by the Court.

4. Respondent’s conduct as set out above constitutes grounds for discipline as follows:

a. Conviction of a felony or any offense involving moral turpitude, in violation of Idaho Code § 54-1412(a)(3) and IDAPA 23.01.01.100.02 and 23.01.01.100.04;

b. Violation of the provisions of the Idaho Nursing Practice Act and its rules and standards of conduct and practice as has been duly promulgated by the Board, in violation of Idaho Code § 54-1412(a)(7); and

c. Engaging in conduct of a character likely to deceive, defraud or endanger patients or the public, in violation of Idaho Code § 54-1412(a)(8).

5. Pursuant to Idaho Code § 54-1412 and IDAPA 23.01.01.131.03, the Board is authorized to enter an order of suspension or revocation of Respondent’s license for Respondent’s violations of Idaho Code and the Board’s duly promulgated rules, as set forth above.

WHEREFORE, the Idaho State Board of Nursing prays for the following action:

1. That a hearing commence at a designated time to allow evidence on the allegations contained in the Complaint to be presented before the Board or the Board’s designated hearing officer;

2. That subsequent to taking evidence, the waiver of a hearing, or the failure of the Respondent to file an Answer to this administrative Complaint, that the Board, or its designated hearing officer, shall issue findings of fact and conclusions of law finding the violations of law alleged herein and the Board shall determine whether the license of Respondent Connie Sue Stapleton should be revoked, suspended or other disciplinary
sanction imposed pursuant to the statutory and regulatory authority of the Board of Nursing; and

3. For such other and further relief as the Board deems just and proper in the circumstances.

DATED this ___ day of May, 1998.

IDAHO STATE BOARD OF NURSING

By Sandra Dean
Sandra Evans, M.A.Ed., R.N.
Executive Director

NOTIFICATION OF PROCEDURAL RIGHTS

Pursuant to the provisions of the Administrative Procedure Act codified at title 67, chapter 52, Idaho Code, and the Idaho Rules of the Administrative Procedure of the Attorney General, promulgated at IDAPA 04.11.01, if you wish to contest the charges set forth in this Complaint, you must: (1) file with the Idaho State Board of Nursing a verified Answer to the allegations contained herein within twenty-one (21) days after you are served with this Complaint and (2) request an evidentiary hearing on the charges. You are further notified that if you fail to answer and/or request a hearing, the Board may enter a default against you and be granted the relief sought in this Complaint. Upon receipt of your Answer and request for hearing, the matter will be reviewed and a hearing scheduled. You will then be notified of the date, time and place of the hearing, the name of the hearing officer appointed by the Board (if any) and further notification of your procedural rights and responsibilities.

You also have the right to be represented by legal counsel, at your own expense, during this administrative proceeding.

Copies of the Administrative Procedure Act and the Idaho Rules of the Administrative Procedure of the Attorney General may be obtained at the Idaho State Law Library.
All original official documents must be filed with the Board at the following address:

Idaho State Board of Nursing  
280 N. Eighth Street, Suite 210  
P.O. Box 83720  
Boise, ID 83720-0061  
telephone: (208) 334-3110  
facsimile: (208) 334-3262  

A copy of the Answer and every pleading, motion or subsequent document filed with the Board must also be served upon legal counsel for the Board at the following address:

Roger L. Gabel  
Deputy Attorney General  
Civil Litigation Division  
P.O. Box 83720  
Boise, ID 83720-0010  

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5th day of May, 1998, I caused to be served a true and correct copy of the foregoing by placing a copy thereof in the United States Mail, certified mail, return receipt requested, and regular mail, postage prepaid, addressed to:

Connie Sue Stapleton  
609 N. Almon #3007  
Moscow, ID 83843  

[Signature]
Roger L. Gabel  
Deputy Attorney General
US Postal Service
Receipt for Certified Mail

Do not use for International Mail (See reverse)

<table>
<thead>
<tr>
<th>Package</th>
<th>Certified Fee</th>
<th>Special Delivery Fee</th>
<th>Registered Delivery Fee</th>
<th>Postage &amp; Fee</th>
<th>Postmark &amp; Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>$</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>$</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Recipient: Connie Stapleton
Street & Number: 
Post Office, State, & ZIP Code: 

SENDERS:
Complete items 1 and/or 2 for additional services.
Complete items 3, 4a, and 4b.
Print your name and address on the reverse of this form so that we can return this card to you.
Attach this form to the front of the mailpiece, or on the back if space does not permit.
Write "Return Receipt Requested" on the mailpiece below the article number.
The Return Receipt will show to whom the article was delivered and the date delivered.

3. Article Addressed to:

CONNIE SUE STAPLETON
609 N ALMON #3007
MOSCOW ID 83843

4a. Article Number
2,239,912,513

4b. Service Type
☐ Registered
☐ Certified
☐ Express Mail
☐ Insured
☐ Return Receipt for Merchandise
☐ COD

5. Received By: (Print Name)

6. Signature: Address or Agent

7. Date of Delivery

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service.
IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF LATAH

STATE OF IDAHO,
Plaintiff,

V.

CONNIE S. STAPLETON,
Defendant.

Case No. CR-98-00083

CRIMINAL INFORMATION

Pursuant to Idaho Criminal Rule 7, the Prosecuting Attorney
of Latah County, Idaho, alleges by this information that:

CONNIE S. STAPLETON

has perpetrated a crime against the State of Idaho, to-wit: GRAND
THEFT, Idaho Code 18-2403, 2407, 2408, a Felony, committed as
follows:

That the Defendant, CONNIE S. STAPLETON, during a
period of time from December 29, 1997 to January 7,
1998, in Moscow City, County of Latah, State of Idaho,
did wilfully, feloniously and as a continuous course of
conduct, take or obtain property belonging to Shirley
Jackle, in that she withdrew cash from Shirley Jackle's
account at Key Bank, by using Shirley Jackle's ATM card
to withdraw cash from the ATM at U.S. Bank, located at
301 S. Main, in a collective value in excess of
$300.00, lawful United States money, all with the
intent to deprive the owner of the use or benefit of said property or to appropriate said property to herself or a third person.

DATED this 30th day of January, 1998.

[Signature]

William W. Thompson, Jr.
Prosecuting Attorney
CERTIFICATE OF DELIVERY

I hereby certify that a true and correct copy of the foregoing Criminal Information was

_______ mailed, United States mail, postage prepaid

✓ hand delivered

_______ sent by facsimile, original by mail

to the following:

Brian D. Thie
Attorney at Law
Latah County Courthouse
Moscow, Idaho 83843

Dated this 31st day of January, 1998.

[Signature]

CRIMINAL INFORMATION: Page -3-
IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT OF
THE STATE OF IDAHO, IN AND FOR THE COUNTY OF LAТАH

STATE OF IDAHO,
   Plaintiff,

V.

CONNIE S. STAPLETON,
   Defendant.

Case No. CR-98-00083
ORDER WITHHOLDING ENTRY
OF JUDGMENT AND
ORDER OF PROBATION

On the 8th day of April, 1998, the defendant, CONNIE S. STAPLETON, defendant's counsel, Brian D. Thie, and the State's attorney, Robin M. Eckmann, appeared before this Court for pronouncement of judgment. On the 10th day of April, 1998, the parties again appeared upon the motion of the State for resentencing on the issue of incarceration as a condition of probation.

On April 8, 1998, the defendant was again advised that a Criminal Information had been filed charging the defendant with the felony offense of GRAND THEFT, Idaho Code 18-2403, 2407, 2408, committed during a period of time from December 29, 1997, to January 7, 1998, and that on 2nd day of February, 1998, the defendant entered a plea of guilty to such charge which plea was
accepted by the Court.

Based upon the Presentence Investigation Report, the evidence, if any, of circumstances in aggravation and in mitigation of punishment, the arguments of counsel, and any statements by the defendant, the Court finds that the interests of justice would best be served if the entry of judgment were withheld and the defendant placed on probation to the Idaho State Board of Correction.

Good cause appearing, it is ORDERED THAT THE ENTRY OF JUDGMENT BE WITHHELD and that the defendant be placed on PROBATION to the Idaho State Board of Correction FOR A PERIOD OF TWO (2) YEARS COMMENCING APRIL 8, 1998, upon the following terms and conditions:

(1) Laws and Cooperation: The defendant shall respect and obey all laws and shall comply with all lawful requests of defendant's supervising probation officer.

(2) Residence: The defendant shall not change residence without first obtaining permission from defendant's supervising probation officer.

(3) Reports: The defendant shall submit a written, truthful report to defendant's supervising probation officer each and every month and shall report in person on dates and at times specified by such probation officer.

(4) Travel: The defendant shall not leave Idaho or defendant's assigned probation district of Lewis, Idaho, Clearwater, Nez Perce, and Latah counties without first
obtaining written permission of defendant's supervising probation officer.

(5) Employment: The defendant shall seek and maintain gainful employment and, once such employment is secured, shall not change that employment or cause it to be terminated without first obtaining written permission from defendant's supervising probation officer; or, in the alternative, if defendant chooses to pursue education in a program approved by defendant's supervising probation officer, defendant shall enroll in such a program and not change her course of study or drop out without prior written permission of such probation officer.

(6) Alcohol: The defendant shall not consume or possess alcoholic beverages in any form and will not enter upon any establishment where the sale of alcohol for consumption on the premises is a primary source of income; the defendant shall submit to tests of her bodily fluids for traces of alcohol at the defendant's own expense whenever requested by defendant's supervising probation officer or any agent of the Division of Probation and Parole of the Idaho State Board of Correction. The defendant shall submit to any testing deemed necessary by the defendant's probation officer to determine if the defendant has an alcohol abuse problem.
The defendant shall also submit to any counseling for alcohol abuse deemed warranted by the defendant's probation officer.

(7) **Controlled Substances:** The defendant shall not use or possess any controlled substance unless lawfully prescribed for defendant's use by a licensed physician or dentist; the defendant shall submit to tests of defendant's bodily fluids for traces of controlled substances at the defendant's own expense whenever requested by defendant's supervising probation officer or any agent of the Division of Probation and Parole of the Idaho State Board of Correction. The defendant shall submit to any testing deemed necessary by the defendant's probation officer to determine if the defendant has a substance abuse problem. The defendant shall also submit to any counseling for substance abuse deemed warranted by the defendant's probation officer.

(8) **Weapons:** The defendant shall not purchase, carry, or have in her possession any firearms or weapons.

(9) **Search:** The defendant shall submit to a search of defendant's person, vehicle, residence, and/or property conducted in a reasonable manner and at reasonable times by any agent of the Division of Probation and Parole of the Idaho State Board of Correction in order to determine whether or not the defendant is complying with the terms
and conditions of her probation.

(10) Payments: The defendant shall:

(a) Pay restitution in the sum of $1,612.00;
(b) Pay court costs of $88.50;

Total $1,700.50

the total of such sums shall be paid to the clerk of this Court in monthly installments (plus a processing fee of an additional two dollars ($2.00) per installment) on a schedule to be determined by her probation officer.

Provided further, the defendant shall also pay 5% interest on the full amount of restitution from the date the money was taken to the date the money was returned to the victim. (February 3, 1998)

(11) Costs of Probation Supervision: The defendant will comply with Idaho Code 20-225 by paying a fee of $35.00 per month to the Idaho Department of Correction to help defray the costs of defendant's probation supervision at such times as defendant's probation officer may direct.

(12) Association: The defendant shall not associate with person(s) with whom defendant's supervising probation officer directs him/her not to associate.

Special Conditions of Probation:

(13) Incarceration: The defendant shall serve twenty-four (24) days in the custody of the Latah County Sheriff. On
April 8, 1998, the Court ordered that the defendant serve ninety (90) days home detention, but that order was withdrawn on April 10, 1998.

(14) Mental Health Counseling: The defendant shall attend and complete any mental health counseling designated by her probation officer.

(15) Credit Agreements: The defendant shall not enter into any credit agreement without written permission from her probation officer and she shall obtain credit counseling as directed by her probation officer.

DATED this 17th day of April, 1998.

John R. Stegner
District Judge
CERTIFICATE OF SERVICE

I do hereby certify that full, true, complete and correct copies of the foregoing ORDER WITHHOLDING ENTRY OF JUDGMENT AND ORDER OF PROBATION were delivered to the following as indicated:

Brian D. Thie  
Attorney at Law  
Latah County Courthouse  
Moscow, ID 83843  
[ ] U.S. Mail  
[ ] Overnight Mail  
[ ] Fax  
☑ Hand Delivery

William W. Thompson, Jr.  
Latah County Prosecuting Attorney  
Latah County Courthouse  
Moscow, ID 83843  
[ ] U.S. Mail  
[ ] Overnight Mail  
[ ] Fax  
☑ Hand Delivery

Scott Hagen  
Department of Correction  
Latah County Courthouse  
Moscow, ID 83843  
[ ] U.S. Mail  
[ ] Overnight Mail  
[ ] Fax  
☑ Hand Delivery

on this 20th day of April, 1998.

Stephanie Mabie  
Deputy Clerk

I certify that I have legal custody of the original of the above record, that the above is a true and correct copy thereof, record and that I have a seal of office and that seal is affixed hereto.

Susan R. Paterman  
Clk. of District Court,  
Latah County, Idaho  
APR 20, 1998
REPORT FORM FOR VIOLATION OF THE NURSING PRACTICE ACT

I. Name of Complainant: Carla R. Gallegos
   Address: 2500 S. Mary St. Boise, Idaho 83709
   Telephone: Home 808-877-1674  Business 808-889-7546

II. Identifying information about whom the complaint is being made:
   (Please check appropriate box)
   ☑ Professional Nurse (RN)  ☐ Nurse Practitioner
   ☐ Licensed Practical Nurse  ☐ Certified Registered Nurse Anesthetist
   ☐ Nursing Assistant  ☐ Other

   Name: Connie Stapleton  N 25466
   Address: 609 N. Amon #3007
   City/State: Moscow, Idaho 83843

   Employer: Latah Health Services
   City/State: Moscow, Idaho 83841
   Position: RN - Charge Nurse

III. Nature of Complaint:
   (Confine statements to actual incidents, giving dates, places and names of persons involved.)
   Explain what happened, where it happened, and the date and time it happened. Attach copies
   of relevant records, if possible.

   I was notified 1/13/98 that a credit card had been stolen from a resident of our facility on or
   about 1/2/98. An investigation by the Moscow Police Dept resulted in the arrest of Connie
   Stapleton, an RN at our facility. I believe a court date has been set for 1/29/98. The court
   ordered Connie's employment as of 1/14/98 when the arrest was made. $1000 had been stolen from
   the resident's bank account. over.
IV. Did any other person(s) witness this incident? If so, please give name(s), address(es), position(s) held, and telephone number(s), if known.

[Handwritten text]

V. Additional Comments:

[Handwritten text]

__________

[Signature]

[Handwritten text]

1-20-9

[Date]

The identity of the complainant will remain confidential except when the complainant may be subpoenaed to testify in a formal hearing procedure.

BOARD OF NURSING COMPLIES WITH PROVISIONS IN THE AMERICANS WITH DISABILITIES ACT.
January 21, 1998

Loretta Todd, Long Term Care
Bureau of Facility Standards
Idaho Department of Health & Welfare
450 W. State Street
Boise, ID 83720

Subject: Financial exploitation of long-term resident by licensed personnel
Date/Time notified: 01/17/98 7:35 AM
Date/Time of Incident: Between January 07 and January 16, 1998

Facility: Latah Health Services
Facility Phone: 1-208-882-7586
Victim: Jackie, Shirley
Diagnosis: Chronic Multiple Sclerosis

Perpetrator: Stapleton, RN, Connie S.

INCIDENT: Two credit cards and $80.00 cash were stolen from a locked drawer in the room of Ms. Shirley Jackie by the R.N. Access to one card was gained at an ATM, using information taken from a file in the financial office. The account was drained of all but 63 cents. The ATM aborted the attempt on the other card.

PLAN OF ACTION: Moscow Police Department viewed the alleged perpetrator on a security tape from the bank, using one card and attempting to use the other. She was arrested at the facility, but is out on her own bond. She will be arraigned on January 29, 1998. Stapleton is currently on Administrative Leave from the facility, until her fate is resolved through the court. She is banned from the facility.

All except $50 of the money stolen from the account was replaced by card insurance and the facility will reimburse that amount to the resident. The resident now carries her key.

All actions taken by the facility were appropriate. They were asked not to talk to anyone about the case until the perpetrator was apprehended.

Sincerely,

Ruth V. McQuinn,
Assistant Ombudsman

JAN 28 1998
REPORT FORM FOR VIOLATION OF THE NURSING PRACTICE ACT

I. Name of Complainant: Shirley M. Jackie
Address: 510 W. Palouse River Drive - Latah Health Services
City/State: Moscow ID 83843
Telephone: Home (208) 883-7586 room 519

II. Identifying information about whom the complaint is being made:
(Please check appropriate box)

☑ Professional Nurse (RN) ☐ Nurse Practitioner
☐ Licensed Practical Nurse ☐ Certified Registered Nurse Anesthetist
☐ Nursing Assistant ☐ Other

Name: Connie Stapleton
Address: 208 N. Almon
City/State: Moscow ID 83843

Employer: Was previously an employer of Latah Health Services
Name: Currently at Moscow Care Center
City/State: Moscow ID 83843
Position: RN

III. Nature of Complaint:
(Confine statements to actual incidents, giving dates, places and names of persons involved.)
Explain what happened, where it happened, and the date and time it happened. Attach copies of relevant records, if possible.

In early January 1998, I discovered that over $1500 had been taken from a local bank account of mine, and that 2 bank cards were missing. After an investigation with the Moscow Police Department, Connie Stapleton was arrested for Grand Theft, which she eventually pled guilty to. All of this took place while Connie was employed as my nurse at Latah Health Services, a long term care facility.
IV. Did any other person(s) witness this incident? If so, please give name(s), address(es), position(s) held, and telephone number(s), if known.

Staff assisting with investigation: (208) 882-7586

Terry Leno, CNHA, Administrator

Pat Lee, LNHA, Director of Facility Services

Jenny Hume, LSW, Director of Social Services

Carla Gallegos, RN, Director of Nursing Services

V. Additional Comments:

I have learned that Connie Stapleton is now working as a nurse at Moscow Care Center, even after having to leave employment here for stealing my bank cards and over $1600 in my account. I feel that she should not be working as a nurse, especially with vulnerable people. I feel her nursing license should be revoked.

Please see the attached "Victim Impact Statement" that was filed with the probation & parole office of Field & Community Services in Lewiston.

Signature: Jackie

Date: 3/4/08

The identity of the complainant will remain confidential except when the complainant may be subpoenaed to testify in a formal hearing procedure.

BOARD OF NURSING COMPLIES WITH PROVISIONS IN THE AMERICANS WITH DISABILITIES ACT.
VICTIM IMPACT STATEMENT
RE: CONNIE STAPLETON, DEFENDANT
SHIRLEY M. JACKLE, VICTIM

The incident of theft has made me distrustful of the nursing profession. As a result, I feel uncomfortable at times at Latah Health Services, wondering if an incident like this might happen again. I wonder if I should trust the people who take care of me. My privacy and personal belongings have been invaded, and I feel very angry and violated that Connie took advantage of a handicapped person in a vulnerable situation. The incident has made me so uncomfortable that I have considered leaving this facility.

Connie stole $1612 from my bank account, and I am responsible for a $50 deductible on the loss. In addition, $85 in cash was stolen from my purse at the same time. My bank has reimbursed me $1612 minus the $50 deductible, resulting in a credit of $1562. I would like to be repaid by Connie for the $50 deductible and the $85 cash. Additionally, I had planned on depositing the balance of this account (the $1612) into another account which is interest-bearing (5%). Therefore, I would also like to be compensated for the interest I could have received if the $1612 had been available for deposit in the interest-bearing account.

I feel very strongly that Connie Stapleton should never again work in a place where she has access to financial information, valuables, or vulnerable people. In addition, her nursing license should be revoked. I would like to bring to your attention that I have just learned that Connie is working as an RN at Moscow Care Center. I feel this is completely inappropriate and that her current patients are at risk, just as I was. I would like for you to look into this matter as soon as possible, because she should not be allowed to work as a nurse again.

Shirley M. Jackle/jh
May 15, 1998

IDAHO STATE BOARD OF NURSING
PO BOX 83720
BOISE ID 83720-0061

Dear Board Members:

The following information is provided as my Answer to the Statement of Charges dated May 5, 1998 case number BON-98-07.

As noted in the Statement of Charges, I did plead guilty to the criminal complaint but there were some extenuating circumstances. I received a withheld judgement from the Latah County Court. Given the following additional information not included in the statement from Latah County, I am requesting that my license not be suspended or revoked.

The extenuating circumstances surrounding the charges include the following:

- I have no prior record and in fact have excellent references and was given a great deal of responsibility for someone only a year out of college.
- At the time the offense occurred I was on medication and being treated for depression.
- I do not consciously recall the events surrounding the theft and was under a great deal of stress at the time. When I realized what I had done, I was in the process of righting the wrong when it was discovered.
- I have a son with spina bifida and was having medical and financial difficulties.

I recognize this is no excuse for my actions; however, I have the capability to be a productive, contributing, competent member of the medical field. It would be a great waste of my potential to revoke or suspend my license and discontinue the service I have been able to provide. I am guilty of making irresponsible choices and have learned a great deal from this ordeal. My qualifications as a Registered Nurse are excellent and I truly wish to continue to follow this career path; I feel I can provide a great service to patients in my area.

From top to bottom, our society is success oriented; however one may define that in terms of one’s own goals. We develop unrealistic expectations in life and of ourselves and then when our wings get broken, we think failure ends our usefulness. It takes a person who has discovered something of the measure of his own weakness to be patient with the foibles of others.
Please consider these factors and the fact that the Latah County Court withheld judgement on these charges, placing me on probation to give me a chance to redeem myself.

I request an evidentiary hearing on this matter as directed in the notification of procedural rights.

Respectfully submitted,

Connie Sue Stapleton