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

GINGER WILSON
PN-8825

Idaho Board of Nursing – PO Box 83720 – Boise, Idaho 83720-0061 – (208) 334-3110
February 20, 1997

CERTIFIED MAIL

Ginger Wilson
c/o Larry Dean Kissee - Attorney at Law
PO Box 323
Ash Flat, AR 72513

Dear Ms. Wilson:

Upon formal action by the Idaho Board of Nursing on February 20, 1997, the Stipulation was accepted and your practical nurse license PN-8825, was revoked by reason of voluntary surrender.

You may not practice nursing in the State of Idaho during the time your license is revoked.

Sincerely,

SANDRA EVANS, M.A.Ed., R.N.
Executive Director

SE: lhc
enclosure
ALAN G. LANCE
ATTORNEY GENERAL

DAVID G. HIGH
Chief of Civil Litigation

ROGER L. GABEL
Deputy Attorneys General
700 W. Jefferson, Room 210
P.O. Box 83720
Boise, ID 83720-0010
Telephone: (208) 334-2400

Attorneys for Idaho Board of Nursing

IDAHO STATE BOARD OF NURSING

In the Matter of: ) Case No. 96-43
GINGER WILSON, ) STIPULATION AND ORDER
 ) REVOKING LICENSE
Respondent. )

COMES NOW the Idaho State Board of Nursing (Board), by and through its attorney, the Idaho Attorney General’s office, and Ginger Wilson (Wilson), the licensee in this matter, and hereby stipulate and agree as follows:

1. Wilson is currently licensed by the Board as a nurse under License No. PN-8825.

2. On June 24, 1996, the Board took action against Wilson’s license by filing an administrative complaint seeking revocation or suspension of the license based upon her activities in the state of Arkansas. Said complaint is expressly incorporated herein and made a part of this stipulation and order as “Exhibit A.”

STIPULATION AND ORDER REVOKING LICENSE - 1
3.
Wilson admits to all factual allegations made by the Board in the administrative complaint and further admits that said conduct violated the statutes and rules of the Board as charged.

4.
Based upon the foregoing, Wilson has surrendered her license for revocation by the Board.

5.
The parties agree that revocation is an appropriate resolution of this matter under the circumstances and that no other administrative penalties will be imposed by the Board arising out of this proceeding.

6.
Wilson acknowledges that she has entered into this stipulation knowingly and voluntarily, after consulting with legal counsel, and that she fully understands that by entering into this agreement she is waiving any procedural rights, including a right to a hearing on the allegations of the complaint, in the interest of an orderly and just disposition of this case.

STATE OF IDAHO
OFFICE OF THE ATTORNEY GENERAL

DATE 11/18/96
BY: [Signature]
ROGER L. GABEL
Deputy Attorney General
Civil Litigation Division

DATE 11/12/96
GINGER WILSON
Licensee

STIPULATION AND ORDER REVOKING LICENSE - 2
ORDER

IT APPEARING from the foregoing Stipulation that there is good cause,

IT IS HEREBY ORDERED that, pursuant to Idaho Code § 54-1412, License No. PN-8825 issued to Ginger Wilson is hereby revoked, effective immediately.

IT IS FURTHER ORDERED that any future request for reinstatement of this revoked license will be in compliance with all applicable statutes and rules of the Board of Nursing, specifically, IDAPA 23.01.01.121.

DATED this 20TH day of FEBRUARY, 1997.

STATE OF IDAHO
BOARD OF NURSING

BY: Charles Moseley
Chairman, R.N., C.R.N.A.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25TH day of FEBRUARY, 1997, 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:

Ginger Wilson
c/o Larry Dean Kissee
Attorney at Law
P.O. Box 323
Ash Flat, AR 72513

Ginger Wilson
c/o P.O. Box 38
Hardy, AR 72542

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

SANDRA EVANS
Executive Director, MA.Ed., R.N.
BEFORE THE BOARD OF NURSING, STATE OF IDAHO

In the matter of
Ginger Gail Jones
Riggs Wilson
License No: PN-8825

COMPLAINT FOR
REVOCATION OR
SUSPENSION OF
LICENSE
CASE NO: 96-43

COMES NOW, Complainant, Sandra Evans, M.A.Ed., R.N., Interim Executive Director of the Idaho Board of Nursing, and requests the Board to revoke or suspend the license of Ginger Gail Jones Riggs Wilson to practice nursing in the State of Idaho. This Complaint and these proceedings are instituted upon the following grounds:

That the licensee has violated provisions in rules and standards of conduct as adopted by the Board, and had a license to practice nursing revoked in another jurisdiction by virtue of the following actions:

1. Licensure to practice as a licensed practical nurse in the State of Arkansas was revoked by an Order dated October 18, 1995, following a hearing on October 12, 1995, before the Arkansas State Board of Nursing, based on the following facts and allegations:
   a. On March 28, 1995, pre-employment drug test with Beverly Enterprises was confirmed positive for Cocaine metabolites.
   b. Arrest on July 28, 1995, for possession of controlled substance and drug paraphernalia.
   c. On August 7, 1997, convicted of two (2) counts of theft and two (2) counts of burglary. The licensee was sentenced to serve 60 months in the Arkansas Department of Corrections.
The undersigned Sandra Evans, believes that the described conduct of the licensee is in violation of Section 54-1412, (a), (3), (7), (8), and (9) IDAHO CODE, and of Board of Nursing Rules, IDAPA 23.01.01100.02., 08.(k), and 10.

DATED THIS 24th day of June, 1996.

SANDRA EVANS, M.A.Ed., R.N.
Executive Director
Idaho Board of Nursing
PROOF OF SERVICE

I hereby swear that I have this 24th day of June, 1996, served the foregoing Complaint for Revocation or Suspension of License and Answer to Complaint upon all parties of record named in this proceeding, by mailing a copy thereof, certified mail, return receipt requested, properly addressed with postage prepaid, to:

GINGER WILSON
C/O PO BOX 1138
HARDY, AR 72542

Sandra Evans, M.A.Ed., R.N.
Interim Executive Director
Idaho Board of Nursing
August 21, 1996

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

RE: Ginger Wilson, Idaho Board of Nursing Case No. 96-43

Dear Mr. Gabel:

Thank you for your kind letter of August 7, 1996, concerning Ginger Wilson. I apologize for not returning your telephone call to you before I received your letter.

Ms. Wilson has decided to accept the settlement offer that was contained in your letter. Enclosed you will find the license that she had which was issued by the State Board of Nursing. Please let us know if there’s anything additional we need to sign to finalize this matter.

Thank you again for the kind help in this matter.

With best regards, I am,

Sincerely yours,

Larry Dean Kissee

STATE OF IDAHO
BOARD OF NURSING
DUPLICATE

THIS IS TO CERTIFY THAT
GINGER RIGGS WILSON
POB 38
HARDY AR 72542

HAS COMPLIED WITH THE REQUIREMENTS OF THE LAW AND IS ENTITLED TO PRACTICE AS A LICENSED PRACTICAL NURSE

Expires August 31, 1996  
EXECUTIVE DIRECTOR

enclosure  
cc: Ms. Ginger Wilson