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

Carmen Wright

Idaho Board of Nursing – PO Box 83720 – Boise, Idaho 83720-0061 – (208) 334-3110
Carmen L. Wright  
3025 W Summer Avenue  
Athol, ID 83801

Dear Ms. Wright:

During their meeting on May 1-2, 2008, the Board of Nursing members took action to accept the Stipulation and Consent Order to issue you a formal Reprimand. Enclosed is a copy of the Final Order.

The Order became effective May 1, 2008. Please be advised that you may apply for reinstatement as indicated in Sections C.2 through 4.

Sincerely,

[Signature]

SANDRA EVANS, MAEd, RN  
Executive Director

SE: lhc

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*The Mission of the Board of Nursing is to regulate nursing practice and education for the purpose of safeguarding the public health, safety and welfare.*
BEFORE THE IDAHO STATE BOARD OF NURSING

In the Matter of the License of: 

CARMEN L. WRIGHT, 
License No. N-27803, 
Respondent.

Case No. BON 07-057
STIPULATION AND
CONSENT ORDER

WHEREAS, information has been received by the Idaho State Board of Nursing (the "Board") that constitutes sufficient grounds for the initiation of an administrative action against Carmen L. Wright ("Respondent"); and

WHEREAS, the parties wish to expeditiously settle the matter in lieu of proceeding to an administrative hearing before the Board; now, therefore,

IT IS HEREBY STIPULATED AND AGREED between the undersigned parties that this matter shall be settled and resolved upon the following terms:

A. Stipulated Facts and Law

A.1. The Board regulates the practice of nursing in the State of Idaho in accordance with title 54, chapter 14, Idaho Code.

A.2. The Board has issued License No. N-27803 to Respondent. Respondent's license expired August 31, 2007, and Respondent has not renewed her license. Respondent's license and renewal rights are subject to the provisions of title 54, chapter 14, Idaho Code and the Board's rules at IDAPA 23.01.01, et seq.

A.3. On or about October 1, 2007, Respondent was convicted after a plea of guilty of Making a False Statement, a felony, in United States v. Wright, United States District Court for the District of Idaho Case No. CR-04-109. The count of "Making a False Statement" to which Respondent pled guilty, read as follows in the Indictment:

On or about the 25th day of August, 1999, in the District Court of Idaho [John Doe] and CARMEN LEANN WRIGHT, the defendants, aided and abetted one another, did knowingly make a materially false statement to [a bank], a federally insured financial institution, knowing the statement
was false for the purpose of influencing the action of [the bank] to wit, provided false and fraudulent loan application and false 1997 Federal W-2 form and 1997 and 1998 Federal Tax Returns for CARMEN LEANN WRIGHT, the Defendants knew these were false and fictitious documents in connection with an attempted loan in the amount of $95,000.00.

As a result of the conviction, Respondent was placed on supervised probation for a period of three years. A true and correct copy of the Judgment in a Criminal Case in Case No. CR-04-109 is attached hereto as Exhibit A.

A.4. Respondent’s conviction of a felony constitutes grounds for discipline against Respondent’s nursing license, specifically, Idaho Code § 54-1413(1)(c) and Board Rule 100.02 (conviction of a felony).

A.5. Respondent, in lieu of proceeding with a formal disciplinary action, hereby agrees that the Board may enter a final order against her license as set forth in Section C below.

B. Waiver of Procedural Rights

I, Carmen L. Wright, by affixing my signature hereto, acknowledge that:

B.1. I have read, understand and admit the allegations pending before the Board as stated in Section A, above, and I agree that the Board has jurisdiction to proceed in this matter.

B.2. I understand that I have the right to a full and complete hearing; the right to confront and cross-examine witnesses; the right to present evidence or to call witnesses, or to testify myself; the right to reconsideration of the Board’s orders; the right to judicial review of the Board’s orders; and all rights accorded by the Administrative Procedure Act of the State of Idaho and the laws and rules governing the practice of nursing in the State of Idaho. I hereby freely and voluntarily waive these rights in order to enter into this Stipulation as a resolution of the pending allegations.

B.3. I understand that in signing this Stipulation I am enabling the Board to impose disciplinary action upon my license without further process.

STIPULATION AND CONSENT ORDER - 2
C. Stipulated Discipline

C.1. Respondent is hereby reprimanded by the Board.

C.2. If Respondent applies for reinstatement of her license in the future:

a. Respondent shall provide to the Board verification of compliance with her criminal probation in Case No. CR-04-109 or, if Respondent has been released from probation in Case No. CR-04-109, Respondent shall submit proof that she has complied with all conditions of probation and has been released from probation.

b. Respondent shall request the State of Washington Department of Health to provide to the Board with verification of Respondent’s compliance with the Stipulation to Informal Disposition entered against Respondent on February 22, 2008, in State of Washington Department of Health, Nursing Care Quality Assurance Commission Docket No. 08-01-A-1014RN.

c. Respondent shall pay a fine in the amount of Five Hundred and No/100 Dollars ($500.00).

d. Respondent shall pay investigative costs and attorney fees incurred by the Board in this matter in the amount of Two Hundred Fifty and No/100 Dollars ($250.00).

C.3. Any request for reinstatement shall be evaluated by the Board pursuant to the guidelines in Board Rule 120.

C.4. If Respondent applies for reinstatement of her license while she is still on probation in Case No. CR-04-109, and the Board approves reinstatement of Respondent’s license, said license shall be a limited license until Respondent has successfully completed her probation in Case No. CR-04-109. Any limited license issued to Respondent shall be a single-state license and Respondent shall not be eligible to practice on the Compact privilege in any other state participating in the Nurse Licensure Compact with the State of Idaho.
C.5. The violation of any of the terms of this Stipulation by Respondent will warrant further Board action. The Board therefore retains jurisdiction over this proceeding until all matters are finally resolved as set forth in this Stipulation.

D. Presentation of Stipulation to Board

D.1. The Board’s prosecutor shall present this Stipulation to the Board with a recommendation for approval.

D.2. The Board may accept, modify with Respondent’s approval, or reject this Stipulation. If the Board rejects the Stipulation, an administrative Complaint may be filed with the Board. Respondent waives any right Respondent may have to challenge the Board’s impartiality to hear the allegations in the administrative Complaint based on the fact that the Board has considered and rejected this Stipulation. Respondent does not waive any other rights regarding challenges to Board members.

D.3. If the Board rejects this Stipulation then, except for Respondent’s waiver set forth in Paragraph D.2., this Stipulation shall be regarded as null and void, and admissions in this Stipulation and negotiations preceding the signing of this Stipulation will not be admissible at any subsequent disciplinary hearing.

D.4. Except for Paragraph D.2. which becomes effective when Respondent signs this Stipulation, this Stipulation shall not become effective until it has been approved by a majority of the Board and a Board member signs the attached Order.

E. Violation of Stipulation and Consent Order

E.1. If Respondent violates this Stipulation and Consent Order, the violation shall be considered grounds for additional discipline and the Board may impose additional discipline pursuant to the following procedure:

a. The Board’s staff shall schedule a hearing before the Board to assess whether Respondent has violated this Stipulation and Consent Order. The staff shall also serve notice of the hearing and charges to Respondent and to Respondent’s attorney, if any. Within fourteen (14) days after the notice of the hearing and charges is served,
Respondent may submit a response to the allegations. If Respondent does not submit a timely response to the Board, the alleged violations will be deemed admitted.

b. At the hearing, the Board and Respondent may submit evidence and present oral argument based upon the record in support of their positions. Unless otherwise ordered by the Board, the evidentiary record before the Board shall be limited to evidence relevant to whether Respondent has violated this Stipulation and Consent Order. At the hearing the facts and substantive matters related to the violations described in Section A shall not be at issue.

c. At the hearing, the Board may impose additional discipline, which may include the suspension or revocation of Respondent’s license, the imposition of fines, the recovery of costs and attorney fees incurred by the Board and/or other conditions or limitations upon Respondent’s practice.

E.2. This Stipulation and Consent Order is the resolution of a contested case and is a public record.

E.3. This Stipulation contains the entire agreement between the parties, and Respondent is not relying on any other agreement or representation of any kind, verbal or otherwise.

I have read the above Stipulation fully and have had the opportunity to discuss it with legal counsel. I understand that by its terms I am waiving certain rights accorded me under Idaho law. I understand that the Board may either approve this Stipulation as proposed, approve it subject to specified changes, or reject it. I understand that, if approved as proposed, the Board will issue an Order on this Stipulation according to the aforementioned terms, and I hereby agree to the above Stipulation for settlement. I understand that if the Board approves this Stipulation subject to changes, and the changes are acceptable to me, the Stipulation will take effect and an order modifying the terms of the Stipulation will be issued. If the changes are unacceptable to me or the Board rejects this Stipulation, it will be of no effect.
DATED this 22nd day of April, 2008.

Carmen L. Wright
Respondent

I recommend that the Board enter an Order based upon this Stipulation.

DATED this 24th day of April, 2008.

STATE OF IDAHO
OFFICE OF THE ATTORNEY GENERAL

By
Karl T. Klein
Deputy Attorney General

ORDER

Pursuant to Idaho Code § 54-1404, the foregoing is adopted as the decision of the Board of Nursing in this matter and shall be effective on the 1st day of May, 2008. IT IS SO ORDERED.

IDAHO STATE BOARD OF NURSING

By
Susan Odom, Ph.D., R.N.
Chair
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7TH day of MAY, 2008, I caused to be served a true and correct copy of the foregoing by the following method to:

Carmen L. Wright
3025 W. Summer Avenue
Athol, ID 83801

☐ U.S. Mail
☐ Hand Delivery
☒ Certified Mail, Return Receipt Requested
☐ Overnight Mail
☐ Facsimile: ______________
☐ Statehouse Mail

Karl T. Klein
Deputy Attorney General
P.O. Box 83720
Boise, ID 83720-0010

☐ U.S. Mail
☐ Hand Delivery
☐ Certified Mail, Return Receipt Requested
☐ Overnight Mail
☐ Facsimile: ______________
☒ Statehouse Mail

Sandra Evans, M.A.Ed., R.N.
Executive Director
Board of Nursing

STIPULATION AND CONSENT ORDER - 7
UNITED STATES DISTRICT COURT

UNITED STATES OF AMERICA

V.

CARMEN LEANN WRIGHT

JUDGMENT IN A CRIMINAL CASE

Case Number: 2:04CR00109-002-N-EJL
USM Number: 12313-081
Terence M. Ryan
Defendant's Attorney

THE DEFENDANT:

X pleaded guilty to count(s) Five

□ pleaded nolo contendere to count(s)
which was accepted by the court.

□ was found guilty on count(s)
after a plea of not guilty.

The defendant is adjudicated guilty of these offenses:

Title & Section Nature of Offense Offense Ended Count
18 USC § 1014 False Statements 05/2000 5

The defendant is sentenced as provided in pages 2 through 6 of this judgment. The sentence is imposed pursuant to

□ The defendant has been found not guilty on count(s)

X Count(s) 1, 2, 3, 4 and 6 □ is □ are dismissed on the motion of the United States.

It is ordered that the defendant must notify the United States attorney for this district within 30 days of any change of name, residence, or mailing address until all fines, restitution, costs, and special assessments imposed by this judgment are fully paid. If ordered to pay restitution, the defendant must notify the court and United States attorney of material changes in economic circumstances.

October 1, 2007
Date of Imposition of Judgment

Edward J. Lodge, United States District Judge
Name and Title of Judge

October 10, 2007
Date

Exhibit A
Page 1 of 6
IMPRISONMENT

The defendant is hereby committed to the custody of the United States Bureau of Prisons to be imprisoned for a total term of ______ time served.

☐ The court makes the following recommendations to the Bureau of Prisons:

☐ The defendant is remanded to the custody of the United States Marshal.

☐ The defendant shall surrender to the United States Marshal for this district:
  ☐ at ________________________ ☐ a.m. ☐ p.m. on ________________________
  ☐ as notified by the United States Marshal.

☐ The defendant shall surrender for service of sentence at the institution designated by the Bureau of Prisons:
  ☐ before 2 p.m. on ________________________
  ☐ as notified by the United States Marshal.
  ☐ as notified by the Probation or Pretrial Services Office.

RETURN

I have executed this judgment as follows:

Defendant delivered on ________________________ to ________________________

at ________________________, with a certified copy of this judgment.

____________________________________
UNITED STATES MARSHAL

By __________________________________
DEPUTY UNITED STATES MARSHAL
SUPERVISED RELEASE

Upon release from imprisonment, the defendant shall be on supervised release for a term of: Three Years

The defendant must report to the probation office in the district to which the defendant is released within 72 hours of release from the custody of the Bureau of Prisons.
The defendant shall not commit another federal, state or local crime.
The defendant shall not unlawfully possess a controlled substance. The defendant shall refrain from any unlawful use of a controlled substance. The defendant shall submit to one drug test within 15 days of release from imprisonment and at least two periodic drug tests thereafter, as determined by the court.
X The above drug testing condition is suspended, based on the court’s determination that the defendant poses a low risk of future substance abuse. (Check, if applicable.)
X The defendant shall not possess a firearm, ammunition, destructive device, or any other dangerous weapon. (Check, if applicable.)
X The defendant shall cooperate in the collection of DNA as directed by the probation officer. (Check, if applicable.)
☐ The defendant shall register with the state sex offender registration agency in the state where the defendant resides, works, or is a student, as directed by the probation officer. (Check, if applicable.)
☐ The defendant shall participate in an approved program for domestic violence. (Check, if applicable.)

If this judgment imposes a fine or restitution, it is a condition of supervised release that the defendant pay in accordance with the Schedule of Payments sheet of this judgment.
The defendant must comply with the standard conditions that have been adopted by this court as well as with any additional conditions on the attached page.

STANDARD CONDITIONS OF SUPERVISION

1) the defendant shall not leave the judicial district without the permission of the court or probation officer;
2) the defendant shall report to the probation officer and shall submit a truthful and complete written report within the first five days of each month;
3) the defendant shall answer truthfully all inquiries by the probation officer and follow the instructions of the probation officer;
4) the defendant shall support his or her dependents and meet other family responsibilities;
5) the defendant shall work regularly at a lawful occupation, unless excused by the probation officer for schooling, training, or other acceptable reasons;
6) the defendant shall notify the probation officer at least ten days prior to any change in residence or employment;
7) the defendant shall refrain from excessive use of alcohol and shall not purchase, possess, use, distribute, or administer any controlled substance or any paraphernalia related to any controlled substances, except as prescribed by a physician;
8) the defendant shall not frequent places where controlled substances are illegally sold, used, distributed, or administered;
9) the defendant shall not associate with any persons engaged in criminal activity and shall not associate with any person convicted of a felony, unless granted permission to do so by the probation officer;
10) the defendant shall permit a probation officer to visit him or her at any time at home or elsewhere and shall permit confiscation of any contraband observed in plain view of the probation officer;
11) the defendant shall notify the probation officer within seventy-two hours of being arrested or questioned by a law enforcement officer;
12) the defendant shall not enter into any agreement to act as an informer or a special agent of a law enforcement agency without the permission of the court; and
13) as directed by the probation officer, the defendant shall notify third parties of risks that may be occasioned by the defendant’s criminal record or personal history or characteristics and shall permit the probation officer to make such notifications and to confirm the defendant’s compliance with such notification requirement.

Exhibit A
Page 1 of 6
DEFENDANT: CARMEN LEANN WRIGHT
CASE NUMBER: 2:04CR00109-N-EIL

ADDITIONAL SUPERVISED RELEASE TERMS

Defendant shall not commit another federal, state or local crime during the term of supervision.

The defendant shall comply with the rules and regulations of the Probation Department.

Defendant shall perform 50 hours of community service as directed by the probation officer in lieu of a fine.

The defendant shall submit to a search of her home, vehicle, and/or person upon demand of the probation officer, or a person duly authorized by the probation officer, without necessity of a warrant and shall submit to seizure of any contraband found therein.

The defendant shall, upon request of the probation officer, or a person duly authorized by the probation officer, provide any and all financial information requested by the probation officer or the duly authorized person.

The defendant shall not incur any new credit charges nor open additional lines of credit without the approval of the probation officer.

Defendant shall provide the probation officer with accurate yearly tax documents and shall cooperate with the IRS in paying any taxes owed.

Restitution is ordered in the amount of $5,539.09 at a monthly rate to be established by the probation officer. Each monthly payment shall be made on or before a date established by the probation officer. The payment shall be made to the Clerk of the Court for the District of Idaho, 550 W. Fort St. MSC 039, Boise, ID 83724 to be paid jointly and severally on behalf of:
   Global Credit Union
   Restitution for Loan #294790
   1520 W. 3rd Avenue
   Spokane WA 99204

The defendant shall submit nominal periodic payments while incarcerated through the inmate financial responsibility program. Upon release from custody the Court will, with assistance from the probation officer, review the defendant’s financial status and determine an appropriate restitution payment schedule. The payment schedule shall be regularly reviewed by the Court and may be modified based upon defendant’s ability to pay.

Pursuant to 18 USC 3013 defendant shall pay a Special Assessment of $100.00 which is due immediately.
DEFPENDANT: CARMEN LEANN WRIGHT  
CASE NUMBER: 2:04CR00109-002-N-EJL

CRIMINAL MONETARY PENALTIES

The defendant must pay the total criminal monetary penalties under the schedule of payments on Sheet 6.

<table>
<thead>
<tr>
<th>TOTALS</th>
<th>Assessment</th>
<th>Fine</th>
<th>Restitution</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>$100.00</td>
<td></td>
<td>$5,539.09</td>
</tr>
</tbody>
</table>

☐ The determination of restitution is deferred until _____. An Amended Judgment in a Criminal Case (AO 245C) will be entered after such determination.

☒ The defendant must make restitution (including community restitution) to the following payees in the amount listed below.

If the defendant makes a partial payment, each payee shall receive an approximately proportioned payment, unless specified otherwise in the priority order or percentage payment column below. However, pursuant to 18 U.S.C. § 3664(f), all nonfederal victims must be paid before the United States is paid.

<table>
<thead>
<tr>
<th>Name of Payee</th>
<th>Total Loss*</th>
<th>Restitution Ordered</th>
<th>Priority or Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Global Credit Union</td>
<td>5,539.09</td>
<td>5,539.09</td>
<td></td>
</tr>
</tbody>
</table>

TOTALS $5,539.09

☐ Restitution amount ordered pursuant to plea agreement $ ______________________

☐ The defendant must pay interest on restitution and a fine of more than $2,500, unless the restitution or fine is paid in full before the fifteenth day after the date of the judgment, pursuant to 18 U.S.C. § 3612(f). All of the payment options on Sheet 6 may be subject to penalties for delinquency and default, pursuant to 18 U.S.C. § 3612(g).

☐ The court determined that the defendant does not have the ability to pay interest and it is ordered that:

☐ the interest requirement is waived for the ☐ fine ☐ restitution.

☐ the interest requirement for the ☐ fine ☐ restitution is modified as follows:

* Findings for the total amount of losses are required under Chapters 109A, 110, 110A, and 113A of Title 18 for offenses committed on or after September 13, 1994, but before April 23, 1996.
SCHEDULE OF PAYMENTS

Having assessed the defendant's ability to pay, payment of the total criminal monetary penalties are due as follows:

A ☐ Lump sum payment of $__________ due immediately, balance due

☐ not later than ____________, or

☐ in accordance ☐ C, ☐ D, ☐ E, or ☐ F below; or

B ☐ Payment to begin immediately (may be combined with ☐ C, ☐ D, or ☐ F below); or

C ☐ Payment in equal ____________ (e.g., weekly, monthly, quarterly) installments of $__________ over a period of ____________ (e.g., months or years), to commence ____________ (e.g., 30 or 60 days) after the date of this judgment; or

D ☐ Payment in equal ____________ (e.g., weekly, monthly, quarterly) installments of $__________ over a period of ____________ (e.g., months or years), to commence ____________ (e.g., 30 or 60 days) after release from imprisonment to a term of supervision; or

E ☐ Payment during the term of supervised release will commence within ____________ (e.g., 30 or 60 days) after release from imprisonment. The court will set the payment plan based on an assessment of the defendant's ability to pay at that time; or

F ☒ Special instructions regarding the payment of criminal monetary penalties:

Special assessment and restitution are due immediately or in a schedule of monthly payments to be determined by the probation officer based upon the defendant's ability to pay.

Unless the court has expressly ordered otherwise, if this judgment imposes imprisonment, payment of criminal monetary penalties is due during imprisonment. All criminal monetary penalties, except those payments made through the Federal Bureau of Prisons' Inmate Financial Responsibility Program, are made to the clerk of the court.

The defendant shall receive credit for all payments previously made toward any criminal monetary penalties imposed.

☐ Joint and Several

Defendant and Co-Defendant Names and Case Numbers (including defendant number), Total Amount, Joint and Several Amount, and corresponding payee, if appropriate.

Restitution amount of $5,530.02, payable to Global Credit Union is ordered joint and several with the co-defendant in this case, Charles Drake Crazier 2:04CR00109-001-N-ESL.

☐ The defendant shall pay the cost of prosecution.

☐ The defendant shall pay the following court cost(s):

☐ The defendant shall forfeit the defendant's interest in the following property to the United States:

Payments shall be applied in the following order: (1) assessment, (2) restitution principal, (3) restitution interest, (4) fine principal, (5) fine interest, (6) community restitution, (7) penalties, and (8) costs, including cost of prosecution and court costs.