



1           4.       Respondent acknowledges and agrees that upon signing this Consent  
2 Agreement and returning it to the Board's Executive Director, Respondent may not revoke their  
3 acceptance of this Consent Agreement or make any modifications to it. Any modification of this  
4 original document is ineffective and void unless mutually approved by the parties in writing.

5           5.       The findings contained in the Findings of Fact portion of this Consent Agreement  
6 are conclusive evidence of the facts stated herein between only Respondent and the Board for  
7 the final disposition of this matter and may be used for purposes of determining sanctions in any  
8 future disciplinary matter.

9           6.       Although Respondent does not agree that all the Findings of Fact set forth in this  
10 Consent Agreement are supported by the evidence, Respondent acknowledges that it is the  
11 Board's position that, if this matter proceeded to formal hearing, the Board could establish  
12 sufficient evidence to support a conclusion that certain of Respondent's conduct constituted  
13 unprofessional conduct. Therefore, Respondent has agreed to enter into this Consent  
14 Agreement as an economical and practical means of resolving the issues associated with the  
15 complaint(s) filed against her. Further, Respondent acknowledges that the Board may use the  
16 evidence in its possession relating to this Consent Agreement for purposes of determining  
17 sanctions in any further disciplinary matter.

18           7.       This Consent Agreement is subject to the Board's approval, and will be effective  
19 only when the Board accepts it. In the event the Board in its discretion does not approve this  
20 Consent Agreement, this Consent Agreement is withdrawn and shall be of no evidentiary value,  
21 nor shall it be relied upon or introduced in any disciplinary action by any party hereto, except  
22 that Respondent agrees that should the Board reject this Consent Agreement and this case  
23 proceeds to hearing, Respondent shall assert no claim that the Board was prejudiced by its  
24 review and discussion of this document or of any records relating thereto.

25 ...



1           b. Respondent allegedly displayed a pattern of unprofessional conduct when  
2           she entered into and engaged in dual relationships with her vulnerable DID  
3           patients.

4           3.     On 11/20/20, Respondent filed for an agency review in the matter of the denial of  
5 her renewal application issue.

6           4.     On appear, the administrative law judge for the Utah Division of Occupation and  
7 Professional Licensing (“DOPL”) vacated the Findings of Fact, Conclusions of Law and Order of  
8 Denial in their entirety because the Division had not provided any documents of information  
9 about the investigation to Respondent prior to the entry of the subsequently vacated Findings of  
10 Fact, Conclusions of Law and Order.

11          5.     On 06/11/21, Respondent withdrew her renewal application while the Division  
12 was investigating her.

13          6.     On 07/14/21, Respondent was reported to the NPDB for withdrawal of her  
14 renewal application while under investigation.

15          7.     On 07/15/19, Respondent submitted an initial application with the Board for her  
16 LCSW licensure in the state of Arizona via endorsement based on her LCSW licensure in Utah.

17          8.     Respondent made a material misrepresentation when answering “No” to the  
18 following background question:

19           a.     “Other than complaints filed by this Board, have you ever been or are you  
20           currently the subject of any complaint, investigation or disciplinary action  
21           against your license, certificate, registration or membership by any state  
22           regulatory board, any professional or occupational credentialing authority or  
23           any professional association in Arizona or any other state? If yes, please  
24           provide copies of the complaint and all final actions.”

25          9.     Specifically, Respondent did not disclose the complaint that was under

1 investigation at the time she submitted her application to the Board and that resulted in the initial  
2 denial of her Utah renewal application.

3 10. On Respondent's 07/01/21 renewal application, which occurred after the Arizona  
4 complaint was received, Respondent then answered "Yes" to the above referenced question on  
5 the background questionnaire and provided the following explanation:

- 6 a. The information has already been previously disclosed to the Board, and the  
7 Board has copies of the complaint.
- 8 b. The allegations were unfounded and DOPL was found to have unlawfully  
9 denied Respondent's renewal when she had never received a copy of a  
10 complaint nor had adverse action against her.
- 11 c. The investigation is no longer open and no action was taken.
- 12 d. If Respondent were to return to Utah, there is no reason she could not renew  
13 her license.

14 11. The Board was made aware of and provided with Respondent's Utah complaint  
15 history by an opened complaint with the Board and the documents contained therein.

16 12. Based on a 04/18/19 email from Respondent to DOPL, she was aware of the  
17 Utah complaint at least three months prior to submitting her Arizona application.

18 13. Respondent represented the following during her investigative interview:

- 19 a. Respondent is aware there were allegations against her in Utah, but she was  
20 not given access to the information.
- 21 b. Respondent did not disclose prior complaints based on her understanding of  
22 the question and the legal advice she was provided.
- 23 c. Respondent would have been unable to get a copy of the complaint if they  
24 chose to not take any action because of Utah law.

25 ...

1 d. Respondent disclosed this information in her renewal application because  
2 she understands the question differently and was provided with the complaint  
3 information from her attorney.

4 14. Respondent signed her application under the penalty of perjury the information  
5 contained is true and correct to the best of her knowledge and belief, but despite this  
6 certification Respondent submitted her application with the above-referenced misrepresentation.

7 15. If the Board would have had information regarding Respondent's Utah  
8 complaints, it may have been grounds for the possible denial of licensure.

9 **CONCLUSIONS OF LAW**

10 1. The Board has jurisdiction over Respondent pursuant to A.R.S. § 32-3251 *et seq.*  
11 and the rules promulgated by the Board relating to Respondent's professional practice as a  
12 licensed behavioral health professional.

13 2. The conduct and circumstances described in the Findings of Fact constitute a  
14 violation of A.R.S. § 32-3251(16)(c)(i), making any oral or written misrepresentation of a fact to  
15 secure or attempt to secure the issuance or renewal of a license.

16 3. The conduct and circumstances described in the Findings of Fact constitute a  
17 violation of A.R.S. § 32-3251(16)(l), engaging in any conduct, practice or condition that impairs  
18 the ability of the licensee to safely and competently practice the licensee's profession.

19 **ORDER**

20 Based upon the foregoing Findings of Fact and Conclusion of Law, the parties agree to  
21 the provision and penalties imposed as follows:

22 1. Respondent's license, LCSW-18027, shall be surrendered to the Board, effective  
23 from the date of entry as signed below.

24 2. The surrender shall be considered a revocation of Respondent's license.

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