

1 3. In submitting her renewal application, Respondent signed an affidavit stating, "I
2 certify under penalty of perjury that all information contained in this renewal application,
3 including supporting documents, is true and correct to the best of my knowledge and belief, with
4 full knowledge that all statements made in this renewal application may be grounds for refusal
5 or subsequent revocation or suspension of my license(s)."

6 4. On 09/11/17, Respondent was notified that she was randomly selected for an
7 audit of her continuing education hours, pursuant to A.A.C. R4-6-801(D).

8 5. Following that notification, Respondent was sent multiple written requests to
9 furnish the Board with verifying documentation of her continuing education hours.

10 6. On at least 7 occasions, Board staff attempted to contact Respondent by way of
11 phone, email or letter, all without response.

12 7. Once the matter was brought to the attention of the Board's Executive Director,
13 the Executive Director placed a call to Respondent, which was immediately returned.

14 8. During their 12/14/17 phone call, Respondent was instructed to submit a written
15 response to the Board's audit in a timely manner.

16 9. Approximately 6 weeks later, on 01/22/18, Respondent submitted written
17 statement that indicated the following:

- 18 a. "I have to admit I have not been diligent in making sure I obtained these
19 records in recent months."
20 b. In recent attempts to save money, her former employer would purchase a
21 one week registration that 2-4 staff members would share by attending the
22 training on select dates.
23 c. As the registration was not in her name, Respondent does not have
24 certificates of completion or verification of her attendance at these
25 conferences.

1 10. Upon review of Respondent's written statement, Board staff again made multiple
2 attempts to contact Respondent for additional information by way of phone, email, and letter.

3 11. Based on Respondent's lack of response, Board staff sent a 03/01/18 certified
4 letter to Respondent's home address notifying her that her failure to furnish information to the
5 Board if legally requested was a potential violation of the Board's rules and statutes.

6 12. In an effort to corroborate Respondent's previous representation that she indeed
7 attended the conferences but was unable to obtain verification of her attendance, Board staff
8 issued a subpoena to the conference provider ("Conference Provider") for records pertaining to
9 Respondent's attendance.

10 13. In response to the subpoena, Conference Provider submitted a written statement
11 indicating they had no record of Respondent's conference registration or attendance for 2016 or
12 2017.

13 14. Conference Provider further indicated there were no records demonstrating that
14 Respondent's former employer purchased block registration or was a sponsor or exhibitor at
15 either the 2016 or 2017 conferences.

16 15. During the Board's 04/06/18 informal meeting, Respondent provided
17 contradictory statements to the Board.

18 16. During her verbal statement to the Board members, Respondent indicated:

19 a. Respondent attended the trainings, but she did not register for them.

20 b. Neither Respondent nor her former employer purchased the training
21 attendance; Respondent just went without paying.

22 17. Respondent's verbal statements appear to contradict her 01/22/18 written
23 statement where she indicated that her former employer purchased a one week registration that
24 2-4 staff members shared by attending the training on select dates.

25 ...

1 **CONCLUSIONS OF LAW**

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

5 2. The conduct and circumstances described in the Findings of Fact constitute a
6 violation of A.R.S. § 32-3251(16)(c)(i), any oral or written misrepresentation of a fact by an
7 applicant or licensee to secure or attempt to secure the issuance or renewal of a license.

8 3. The conduct and circumstances described in the Findings of Fact constitute a
9 violation of A.R.S. § 32-3251(16)(c)(ii), any oral or written misrepresentation of a fact by an
10 applicant or licensee in any statements provided during an investigation or disciplinary
11 proceeding by the Board.

12 4. The conduct and circumstances described in the Findings of Fact constitute a
13 violation of A.R.S. § 32-3251(16)(o), failing to furnish information within a specified time to the
14 Board or its investigators or representatives if legally requested by the Board.


15 **ORDER**

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

18 1. Respondent's license, LISAC-1119, shall be surrendered to the Board, effective
19 from the date of entry as signed below.

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

21 **PROFESSIONAL ACCEPTS, SIGNS AND DATES THIS CONSENT AGREEMENT**

22
23 
24 _____
Tara L. Wilson

_____ Date

25 ...

1 **BOARD ACCEPTS, SIGNS AND DATES THIS CONSENT AGREEMENT**

2 Dated this 19th day of June, 2018.

3
4 By:

Tobi Zavala
5 TOBI ZAVALA, Executive Director
6 Arizona Board of Behavioral Health Examiners

7 **ORIGINAL** of the foregoing filed

8 This 19th day of June, 2018 with:

9 Arizona Board of Behavioral Health Examiners
10 1740 West Adams Street, Suite 3600
11 Phoenix, AZ 85007

12 **COPY** of the foregoing mailed via Interagency Mail

13 This 19th day of June, 2018, to:

14 Marc Harris
15 Assistant Attorney General
16 2005 North Central Avenue
17 Phoenix, AZ 85004

18 **COPY** of the foregoing mailed via

19 Certified mail no. 9489 0090 0027 606 0248327

20 This 19th day of June, 2018, to:

21 Tara L. Wilson
22 Address of Record
23 Respondent
24
25