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Before The
State Of Wisconsin
BOARD OF NURSING

In the Matter of the Disciplinary Proceedings
Against **KATHLEEN M. TURNER, L.P.N.**,
Respondent

FINAL DECISION ORDER
Order No. **0003277**

Division of Legal Services and Compliance Case No. 13 NUR 022

The State of Wisconsin, Board of Nursing, having considered the above-captioned matter and having reviewed the record and the Proposed Decision of the Administrative Law Judge, make the following:

ORDER

NOW, THEREFORE, it is hereby ordered that the Proposed Decision annexed hereto, filed by the Administrative Law Judge, shall be and hereby is made and ordered the Final Decision of the State of Wisconsin, Board of Nursing.

The rights of a party aggrieved by this Decision to petition the department for rehearing and the petition for judicial review are set forth on the attached "Notice of Appeal Information."

Dated at Madison, Wisconsin on the 12 day of June, 2014.

Julia Nelson, RN
Member
Board of Nursing



**Before The
State Of Wisconsin
DIVISION OF HEARINGS AND APPEALS**

In the Matter of Disciplinary Proceedings Against
KATHLEEN M. TURNER, L.P.N., Respondent

PROPOSED DECISION AND ORDER
DHA Case No. SPS-13-0033
0003277

Division of Legal Services and Compliance Case No. 13 NUR 022

The parties to this proceeding for purposes of Wis. Stat. §§ 227.47(1) and 227.53 are:

Kathleen M. Turner
2422 Riverside Drive
Beloit, WI 53511

Wisconsin Board of Nursing
P.O. Box 8366
Madison, WI 53708-8366

Department of Safety and Professional Services, Division of Legal Services and Compliance, by

Attorney Amanda Florek
Department of Safety and Professional Services
Division of Legal Services and Compliance
P.O. Box 7190
Madison, WI 53707-7190

PROCEDURAL HISTORY

On March 10, 2014, the undersigned administrative law judge (ALJ) issued a Summary Judgment Order granting summary judgment to the Department of Safety and Professional Services, Division of Legal Services and Compliance (Division), on the issue of whether Respondent Kathleen M. Turner engaged in misconduct or unprofessional conduct, in violation of Wis. Stat. § 441.07(d) and Wis. Admin. Code § 7.04(1) and (2). The Order denied summary judgment on the issues of discipline and costs. The March 10, 2014 Summary Judgment Order is attached to this decision and incorporated by reference herein.

A telephone status conference was held on March 17, 2014 to establish whether the issues of discipline and costs should be determined on the basis of the parties' written submissions or whether a hearing was required on these issues and, if a hearing was required, to

establish a date for such hearing. Ms. Turner did not appear for the telephone hearing. The Division indicated it would rely on its previously filed submissions but that if Ms. Turner filed a written submission, the Division would file a reply. The ALJ issued a Briefing Order on March 17, 2014, giving Ms. Turner until March 27, 2014 to submit written arguments on the issues of discipline and costs. Ms. Turner did not file any written submissions, and on April 1, 2014, the Division indicated that, in light of Ms. Turner's failure to make any arguments with respect to these issues, the Division would rely on its previous filings in which it argued for revocation of Ms. Turner's right to renew her license and for imposition of full costs on Ms. Turner.

Additional procedural history is contained in the attached Summary Judgment Order.

FINDINGS OF FACT

Facts Related to Alleged Violations

Findings of Fact 1-7, which form the basis for the determination that Ms. Turner engaged in misconduct or unprofessional conduct, are set forth in the attached March 10, 2014 Summary Judgment Order and incorporated by reference herein.

Additional Fact Related to Discipline

8. On October 14, 2010, in Case No. 10 NUR 173, the Wisconsin Board of Nursing (Board) suspended Ms. Turner's license to practice nursing. The Board's Final Decision and Order indicates that Ms. Turner stipulated that she had fraudulently reported to an Arizona employer that she was a registered nurse, provided the Arizona employer with fraudulent credentials indicating that she was licensed in Arizona as a registered nurse, and failed to meet standards of practice while working as a nurse in Arizona. (Division's Memorandum in Support of Motion for Summary Judgment, Ex. 2)

DISCUSSION AND CONCLUSIONS OF LAW

Violations

The discussion and conclusions of law related to whether the Division proved its alleged violations are contained in the attached Summary Judgment Order and incorporated by reference herein. As explained in that Order, Ms. Turner engaged in misconduct or unprofessional conduct, in violation of Wis. Stat. § 441.07(1)(d) (2011-2012), as defined in Wis. Admin. Code § N 7.04(1) and (2).

Discipline

Ms. Turner's professional nursing license was first issued on April 20, 2000, was suspended on October 14, 2010, and expired on April 30, 2011. Although she has not renewed her license, until April 29, 2016, she retains the right to do so upon payment of a fee, consistent

with Wis. Stat. § 440.08(3). The Division requests that Ms. Turner's right to renew her license upon payment of a fee be revoked.¹

The three purposes of discipline are: (1) to promote the rehabilitation of the licensee; (2) to protect the public from other instances of misconduct; and (3) to deter other licensees from engaging in similar conduct. *State v. Aldrich*, 71 Wis. 2d 206, 237 N.W.2d 689 (1976).

Based on the factors articulated in *Aldrich*, the facts of this case and Ms. Turner's prior misconduct, the Division requests that Ms. Turner's right to renew her nursing license be revoked.

As set forth in the March 10, 2014 Summary Judgment Order in the current matter, on September 5, 2013, Ms. Turner was convicted in Rock County Wisconsin Circuit Court Case No. 2012CF281 of three counts of Theft-Movable Property <=\$2500, in violation of Wis. Stat. § 943.20(1)(a), a class A misdemeanor. The criminal complaint upon which her convictions are based alleged that Ms. Turner used the prescription pads of her boyfriend, a physician, to fraudulently fill out prescriptions for Vicodin in the name of her boyfriend's former patient. Using these fraudulent prescriptions, Ms. Turner then obtained Vicodin at the pharmacy for her own use, claiming that she was the caregiver for the patient.

Ms. Turner had originally been charged with six felony counts of Obtaining a Controlled Substance by Fraud. However, the charges to which she ultimately pled guilty were the result of a Drug Court Treatment Diversion Contract between Ms. Turner and the Rock County District Attorney's office whereby, in exchange for the reduced charges, Ms. Turner was required to successfully complete the terms of the nine-month contract, which contained terms related to drug and alcohol treatment and testing and possession or use of alcohol and controlled substances.

Following a court-ordered AODA assessment report completed on July 18, 2012 concluding that Ms. Turner suffered from opioid and alcohol dependence, Ms. Turner successfully completed the terms of her contract.

Based on these facts, the attached Summary Judgment Order concluded that Ms. Turner engaged in misconduct or unprofessional conduct, in violation of Wis. Stat. § 441.07(1)(d) (2011-2012), as defined in Wis. Admin. Code § N 7.04(1) and (2), respectively, in that Ms. Turner violated a law substantially related to the practice of practical nursing, and obtained a drug other than in the course of legitimate practice or as otherwise prohibited by law.

¹ At some points in its memorandum in support of its motion for summary judgment, the Division suggests that it is also requesting that Ms. Turner's license be revoked and that Ms. Turner "be prohibited from petitioning for relicensure for at least one year from the date of revocation." (Div. Memorandum, p. 10) However, in its letter dated March 31, 2014, filed April 1, 2014, the Division requests only revocation of Ms. Turner's right to renew her license. Because the Division's April 1, 2014 submission is its most recent filing and the discipline recommended in that filing (revocation of Ms. Turner's right to license renewal) adequately serves the objectives of discipline in this case, and due to the somewhat confusing nature of any request for revocation of a suspended and expired license and for a prohibition on a petition for reinstatement, I do not address or order these additional disciplinary terms.

Accordingly, pursuant to Wis. Stat. § 441.07(1)(d) (2011-2012), Ms. Turner is subject to discipline.

Ms. Turner's conduct in this matter was serious and indicates a significant problem with controlled substances, requiring rehabilitation. Ms. Turner was willing to go to great lengths -- including committing fraudulent acts substantially related to the practice of nursing and stealing a prescription pad from her physician boyfriend -- to support her addiction. Compounding this conduct is the fact that at the time Ms. Turner committed these offenses in 2011, her license had already been suspended as a result of a prior disciplinary proceeding against her in Wisconsin. In an October 14, 2010 Decision and Order in Case No. 10 NUR 173, the Board suspended Ms. Turner's license based on the fact that she fraudulently reported to an Arizona employer that she was a registered nurse, provided the Arizona employer with fraudulent credentials indicating that she was licensed in Arizona as a registered nurse, and failed to meet standards of practice while working as a nurse in Arizona.

Thus, in addition to her controlled substance issues, Ms. Turner has also demonstrated a pattern of untrustworthiness. Patients under nursing care are often vulnerable individuals who must rely on the trustworthiness of nurses providing their care. Nurses often have access to patients' prescribed controlled substances, as well as to their personal belongings. Ms. Turner's dishonest conduct and abuse of controlled substances would create an unacceptable risk to the public if she were to continue to practice nursing.

Ms. Turner has indicated in previous filings to this tribunal that she no longer has substance abuse issues. The record indicates that Ms. Turner has taken substantial steps in the past to address her substance abuse, including the treatment she underwent pursuant to the drug court contract. Although these efforts are laudable, the record is nonetheless insufficient to contradict indications that Ms. Turner is in need of rehabilitation and would present a threat to future patients. The circumstances of this case and her prior disciplinary case were egregious, as was the fact that Ms. Turner was not rehabilitated or deterred by the Board's previous suspension of her license just a short time earlier. She engaged in fraudulent behavior in Case No. 10 NUR 173, was severely disciplined by the Board, and then engaged in fraudulent behavior again a short time later.

In addition, Ms. Turner's sketchy participation in these proceedings suggests either that she may still have substance abuse issues or that she does not take these disciplinary proceedings against her license seriously, or both. For example, on October 8, 2013, and with the agreement of the parties, the ALJ issued an Amended Briefing Order which required Ms. Turner to file her Amended Answer to the Amended Complaint no later than October 17, 2013 and her response to the Division's motion for summary judgment no later than December 18, 2013. In violation of the Order, Ms. Turner did not file an Amended Answer by October 17. On December 16, 2013, Ms. Turner filed what was captioned, "Answer to complaint."

On January 16, 2014, the ALJ issued an Order to Supplement the Record which gave the Division until January 27, 2014 to file certain documents requested by the ALJ and also gave Ms. Turner until February 3, 2014 to file any response. Although there was no requirement that she do so, Ms. Turner did not file a response. On March 10, 2014, the ALJ issued a Summary

Judgment Order which set a telephone status conference for March 17, 2014. In violation of that Order, Ms. Turner failed to appear and never returned the ALJ's telephone call as requested. Following the status conference, the ALJ issued a Briefing Order which gave Ms. Turner until March 27, 2014 to submit written arguments regarding discipline and costs. Again, Ms. Turner did not bother to file a submission.

The facts of record indicate that Ms. Turner has not been adequately rehabilitated and that the public would not be sufficiently protected if she were allowed to practice nursing. Thus, I conclude that the objectives articulated in *Aldrich* would best be served by revocation of Ms. Turner's right to renew her license pursuant to Wis. Stat. § 448.03(3).

Costs

The Division has the authority to assess costs pursuant to Wis. Stat. § 440.22. With respect to imposition of costs, factors to consider include: (1) the number of counts charged, contested and proven; (2) the nature and seriousness of the misconduct; (3) the level of discipline sought by the prosecutor; (4) the cooperation of the respondent; (5) any prior discipline; and (6) the fact that the Department is a program revenue agency, funded by other licensees. *See In the Matter of Disciplinary Proceedings against Elizabeth Buenzli-Fritz* (LS 0802183 CHI).

Most of the factors related to costs have been addressed in the preceding section's discussion with respect to discipline. However, I further note that the Division has proven the two violations it alleged and that it is seeking and has been granted one of the highest levels of discipline available, that Ms. Turner not be permitted to renew her expired license pursuant to Wis. Stat. § 440.08(3). Finally, the Department is a program revenue agency and it would be unfair to impose the costs of disciplining Ms. Turner on those licensees who have not engaged in misconduct.

In view of the foregoing, I conclude that the Division's request for full assessment of costs against Ms. Turner is warranted.

ORDER

1. The right of Kathleen M. Turner to renew her license to practice as a practical nurse in the State of Wisconsin upon payment of a fee pursuant to Wis. Stat. § 440.08(3) is REVOKED.

2. Within 120 days from the date of the Final Decision and Order in this matter, Ms. Turner shall pay all recoverable costs in this matter in an amount to be established, pursuant to Wis. Admin. Code § SPS 2.18. After the amount is established, payment shall be made by certified check or money order payable to the Wisconsin Department of Safety and Professional Services and sent to:

**Department Monitor
Department of Safety and Professional Services
Division of Legal Services and Compliance
P.O. Box 7190
Madison, WI 53707-7190**

3. The terms of this Order are effective the date the Final Decision and Order is signed by the Board.

Dated at Madison, Wisconsin on May 1, 2014.

STATE OF WISCONSIN
DIVISION OF HEARINGS AND APPEALS
5005 University Avenue, Suite 201
Madison, Wisconsin 53705
Telephone: (608) 266-7709
FAX: (608) 264-9885

By: 

Jennifer E. Nashold
Administrative Law Judge

Attachment: March 10, 2014 Summary Judgment Order



**Before The
State Of Wisconsin
DIVISION OF HEARINGS AND APPEALS**

In the Matter of the Disciplinary Proceedings
Against **KATHLEEN M. TURNER, L.P.N.**,
Respondent

SUMMARY JUDGMENT ORDER
DHA Case No. SPS-13-0033

Division of Legal Services and Compliance Case No. 13 NUR 022

The parties to this proceeding for purposes of Wis. Stat §§ 227.47(1) and 227.53 are:

Kathleen M. Turner
2422 Riverside Drive
Beloit, WI 53511

Department of Safety and Professional Services, Division of Legal Services and
Compliance, by:

Attorney Amanda L. Florek
Department of Safety and Professional Services
Division of Legal Services and Compliance
P. O. Box 7190
Madison, WI 53707-7190

PROCEDURAL HISTORY

The above-captioned matter is before this tribunal on a motion for summary judgment filed on November 13, 2013, by the Department of Safety and Professional Services, Division of Legal Services and Compliance (Division). The Division served its original Complaint on Respondent Kathleen Turner on July 26, 2013. Ms. Turner filed an Answer on September 23, 2013.

On October 7, 2013, the Division filed an Amended Complaint. Although the Division has not filed an affidavit of service of the Amended Complaint with the undersigned administrative law judge (ALJ), the cover letter for the Amended Complaint and the Division's memorandum in support of its motion for summary judgment indicate that Ms. Turner was served with the Amended Complaint by email and first-class mail on the same date the Amended Complaint was filed with the ALJ, October 7, 2013. Ms. Turner does not dispute that she was served with the Amended Complaint on October 7, 2013. On October 8, 2013, and with the agreement of the parties, the ALJ issued an Amended Briefing Order which required Ms. Turner

to file her Amended Answer to the Amended Complaint no later than October 17, 2013 and her response to the Division's motion for summary judgment no later than December 18, 2013. Ms. Turner did not file an Amended Answer by October 17. On December 16, 2013, Ms. Turner filed what was captioned, "Answer to complaint." The Division filed a reply brief on December 23, 2013.

On January 16, 2014, the ALJ issued an Order to Supplement the Record which gave the Division until January 27, 2014 to file certain documents requested by the ALJ and Ms. Turner until February 3, 2014 to file a response. On January 21, 2014, the Division filed a letter with the requested information attached and marked as Division Exhibits 7 and 8. Ms. Turner did not file a response.

UNDISPUTED MATERIAL FACTS

1. Respondent Kathleen M. Turner (DOB June 19, 1974), was formerly licensed in the State of Wisconsin as a practical nurse, having license number 302520-31, first issued on April 20, 2000. This license was suspended on October 14, 2010 and it expired on April 30, 2011. Pursuant to Wis. Stat. § 440.08(3), until April 29, 2016, Ms. Turner retains the right to renew the license upon payment of a fee.

2. On or about February 3, 2012, Ms. Turner was criminally charged in Rock County with six counts of Obtaining a Controlled Substance by Fraud, a Class H Felony, for conduct alleged to have occurred during the time period of August 1, 2011 to October 11, 2011. The criminal complaint alleged that Ms. Turner fraudulently executed prescriptions for Vicodin, using the prescription pads of her boyfriend, who is a physician, and filled out the prescription in the name of her boyfriend's former patient. She then used the fraudulent prescriptions to obtain Vicodin at the pharmacy for her own use, claiming that she was the caregiver for the patient whose name was on the prescription. (Div. Ex. 4)

3. Vicodin contains hydrocodone, and is a Schedule II controlled substance pursuant to Wis. Stat. § 961.18(c), for which a prescription is required pursuant to Wis. Stat. § 961.38(3).

4. On or about June 20, 2012, Ms. Turner entered into a Drug Court Treatment Diversion Contract with the Rock County District Attorney's office. Under the terms of this contract, Ms. Turner would plead guilty to three counts of Obtaining a Controlled Substance, which, if she successfully completed the terms of her 9-month contract, would be amended to three counts of misdemeanor theft to which she would plead guilty and jointly recommend a withheld sentence and probation of two years. The contract also contained terms related to drug and alcohol treatment and testing, and possession or use of alcohol and controlled substances. (Div. Ex. 8)

5. On or about July 18, 2012, Ms. Turner completed a court ordered AODA assessment. The assessment report stated that Ms. Turner suffers from opioid and alcohol dependence. (Div. Ex. 5)

6. On or about August 28, 2013, an Amended Information was filed in Rock County, which added to the original charges of Obtaining a Controlled Substance by Fraud three counts of misdemeanor theft, Counts 7-9. (Div. Ex. 7)

7. On September 5, 2013, in Rock County Wisconsin Circuit Court Case No. 2012CF281, Ms. Turner was convicted of three counts of Theft-Movable Property <=\$2500, in violation of Wis. Stat. § 943.20(1)(a), a class A misdemeanor. The six counts of Obtaining a Controlled Substance by Fraud were dismissed but read in. (Div. Ex. 3)

DISCUSSION AND CONCLUSIONS OF LAW

Standards Governing Summary Judgment

“The summary judgment procedure as provided in s. 802.08, Stats., shall be available to the parties upon approval by the division or the administrative law judge.” Wis. Admin. Code § HA 1.10(2).

Pursuant to Wis. Stat. § 802.08, summary judgment “shall be rendered if the pleadings, depositions, answers to interrogatories, and admissions on file, together with the affidavits, if any, show that there is no genuine issue as to any material fact and that the moving party is entitled to a judgment as a matter of law.” Wis. Stat. § 802.08(2). “When a motion for summary judgment is made and supported as provided in this section [§ 802.08], an adverse party may not rest upon the mere allegations or denials of the pleadings but the adverse party's response, by affidavits or as otherwise provided in this section, must set forth specific facts showing that there is a genuine issue for trial.” Wis. Stat. § 802.08(3). “If the adverse party does not so respond, summary judgment, if appropriate, shall be entered against such party.” *Id.*

“A motion for summary judgment may be made on the basis of the pleadings or other portions of the record in the case or it may be supported by affidavits and a variety of outside material.” *Tews v. NHI, LLC*, 2010 WI 137, ¶ 49, 330 Wis. 2d 389, 793 N.W.2d 860 (citation omitted). On a motion for summary judgment, the facts are construed in favor of the non-moving party. *DeHart v. Wis. Mut. Ins. Co.*, 2007 WI 91, ¶ 7, 302 Wis. 2d 564, 734 N.W.2d 394.

Violation of the Wis. Stat. § 441.07(1)(d) and Wis. Admin. Code § N 7.04(1) and (2)

Wisconsin Stat. § 441.07(1)(d) (2011-2012) provides that the Board may revoke, limit, suspend, or deny the renewal of a license of a licensed practical nurse, or may reprimand a licensed practical nurse, if the Board finds that the person has committed “[m]isconduct or unprofessional misconduct.” Misconduct or unprofessional conduct is defined, in relevant part, as follows:

N 7.04 Misconduct or unprofessional conduct. As used in s. 441.07(1)(d), Stats., “misconduct or unprofessional conduct” means any practice or behavior which violates the minimum standards of the profession necessary for the protection of the health, safety, or welfare of a patient or the public.

"Misconduct or unprofessional conduct" includes, but is not limited to, the following:

(1) Violating, or aiding and abetting a violation of any law substantially related to the practice of professional or practical nursing. A certified copy of a judgment of conviction is prima facie evidence of a violation;

(2) Administering, supplying or obtaining any drug other than in the course of legitimate practice or as otherwise prohibited by law[.]

On September 5, 2013, in Rock County Wisconsin Circuit Court Case No. 2012CF281, Ms. Turner was convicted of three counts of Theft-Movable Property <=\$2500, in violation of Wis. Stat. § 943.20(1)(a), a class A misdemeanor. The criminal complaint upon which Ms. Turner's convictions are based alleged that Ms. Turner used the prescription pads of her boyfriend, a physician, to fraudulently fill out prescriptions for Vicodin in the name of her boyfriend's former patient. Using these fraudulent prescriptions, Ms. Turner then obtained Vicodin at the pharmacy for her own use, claiming that she was the caregiver for the patient.

Ms. Turner has failed to set forth any facts which contradict these material facts. Moreover, these undisputed facts establish that Ms. Turner engaged in misconduct or unprofessional conduct as defined in Wis. Admin. Code § N 7.04(1) and (2).

First, the conduct for which Ms. Turner was convicted is "substantially related" to the practice of nursing, as contemplated by Wis. Admin. Code § N 7.04(1). As a nurse, Ms. Turner would have access to Vicodin and other controlled substances, which she could divert for her own use. As a nurse, Ms. Turner would also work with vulnerable patients who depend on her for their well-being and with whom she must have a relationship based on trust. Ms. Turner would be in a position to control numerous aspects of her patients' lives and would have access to their personal items, money and prescriptions. Ms. Turner has proved herself to be untrustworthy based on the conduct for which she was convicted. In addition, such conduct constitutes "obtaining [a] drug other than in the course of legitimate practice or as otherwise prohibited by law" under Wis. Admin. Code § N 7.04(2).

Accordingly, the undisputed material facts establish that Ms. Turner engaged in misconduct or unprofessional conduct, in violation of Wis. Stat. § 441.07(1)(d) and Wis. Admin. Code § N 7.04(1) and (2), and summary judgment is granted to the Division on these issues.

Discipline and Costs

The Division requests that Ms. Turner's license to practice nursing be revoked and that she pay the full costs of these proceedings. The three purposes of discipline are: (1) to promote the rehabilitation of the licensee; (2) to protect the public from other instances of misconduct; and (3) to deter other licensees from engaging in similar conduct. *State v. Aldrich*, 71 Wis. 2d 206, 237 N.W.2d 689 (1976).

With respect to imposition of costs, factors to consider include: (1) the number of counts charged, contested and proven; (2) the nature and seriousness of the misconduct; (3) the level of discipline sought by the prosecutor; (4) the cooperation of the respondent; (5) any prior

discipline; and (6) the fact that the Department is a program revenue agency, funded by other licensees. See *In the Matter of Disciplinary Proceedings against Elizabeth Buenzli-Fritz* (LS 0802183 CHI).

The Division has failed to apply the standards of summary judgment to the issues of discipline and costs and has not provided any authority suggesting that summary judgment is appropriate for such discretionary determinations.

In light of the discretionary nature of determining both discipline and costs, the exercise of which entails consideration of a wide variety of factors, and in view of the fact that these issues have not been briefed within the framework of summary judgment standards, I cannot conclude that imposition of a particular discipline or percentage of costs is required "as a matter of law" under Wis. Stat. § 802.08. Therefore, a telephone status conference will be held as set forth in the Order section below, at which the parties shall inform the undersigned ALJ whether they wish to submit written arguments on the issues of discipline and costs (or rest on those arguments presented in the submissions already filed) or whether a hearing on the issues of discipline and costs is required.

ORDER

For the reasons set forth above, IT IS ORDERED that:

1. Summary judgment is granted in favor of the Division with respect to whether Ms. Turner engaged in misconduct or unprofessional conduct, in violation of Wis. Stat. § 441.07(d) and Wis. Admin. Code § 7.04(1) and (2).
2. Summary judgment is denied with respect to the issues of discipline and costs.
3. A telephone status conference will be held on March 17, 2014 at 11:00 a.m. to establish whether the issues of discipline and costs may be determined on the basis of the parties' written submissions (either as previously filed or to be filed) or whether a hearing is required on these issues, and if so, to establish a date for such hearing. The ALJ will initiate the call.

Dated at Madison, Wisconsin on March 10, 2014.

STATE OF WISCONSIN
DIVISION OF HEARINGS AND APPEALS
5005 University Avenue, Suite 201
Madison, Wisconsin 53705
Telephone: (608) 266-7709
FAX: (608) 264-9885

By: _____

Jennifer E. Nashold
Administrative Law Judge