



- E. Refrain from working in any job that permits access to drugs;
- F. Disclose to any present and future employers her convictions for stealing drugs and her history of substance abuse; and,
- G. Refrain from all criminal conduct.

There remains one outstanding count on a criminal complaint for a violation of 17-A M.R.S.A. § 1109, stealing drugs, Class D that occurred at the Montello Manor Nursing Home. It is anticipated that Ms. Madison will be entering a plea of guilty on this charge with a similar sentence, that sentence to be served concurrently with the above charges.

- 4. Kimberly J. Madison admits that she has a long-term substance abuse problem, extending back 15 years. During this period she has attempted rehabilitation and has experienced two (2) relapses.
- 5. Kimberly J. Madison recently completed a formal out-patient substance abuse program and continues in after-care.
- 6. Kimberly J. Madison attends AA two (2) times a week.
- 7. Kimberly J. Madison's not currently working as a registered professional nurse.
- 8. Kimberly J. Madison peer/clinical reviews are reported as excellent for the years 1995, 1996 and 1998.

#### AGREEMENT

- 9. **Kimberly J. Madison will voluntarily surrender her license.**
- 10. Kimberly J. Madison shall not work, in any capacity, in the health care field, including in a veterinarian's office, while her nursing license is surrendered. In addition, Ms. Madison is not to seek employment where the handling or dispensing of drugs is part of the job responsibility.
- 11. After three years from the effective date of this Agreement, Ms. Madison may petition the Board for reinstatement of her license. Ms. Madison agrees and understands that her license will not be reinstated until and unless the Board, upon Ms. Madison's written request, votes to reinstate Ms. Madison's license. When considering whether to reinstate Ms. Madison's license, the Board will consider the extent to which Ms. Madison has complied with these conditions and the conditions of her criminal probation.
- 12. The Board agrees to take no further disciplinary action upon these facts so long as Ms. Madison fully complies with these conditions.
- 13. Kimberly J. Madison understands that this document imposes discipline regarding her license to practice registered professional nursing in the State of Maine. Ms. Madison understands

that she does not have to execute this Consent Agreement and that she has the right to consult with an attorney before entering the Consent Agreement.

14. Modification of this Consent Agreement must be in writing and signed by all parties.
15. Kimberly J. Madison affirms that she executes this Consent Agreement of her own free will.
16. This Consent Agreement is not subject to review or appeal by the Licensee, but may be enforced by an action in the Superior Court.
17. This Consent Agreement becomes effective upon the date of the last necessary signature below.

DATED: 9/8/99

Kimberly J. Madison  
KIMBERLY J. MADISON

**FOR THE MAINE STATE BOARD OF NURSING:**

DATED: 9/10/99

Virginia E. deLorimier  
VIRGINIA E. deLORIMIER, M.S.N., R.N.  
Assistant Executive Director

**FOR THE DEPARTMENT OF ATTORNEY GENERAL:**

DATED: 9/13/99

John H. Richards  
JOHN H. RICHARDS  
Assistant Attorney General