



VIRTUAL/TELECONFERENCE
BOARD OF NURSING
Virtual, 4822 Madison Yards Way, Madison
Contact: Brad Wojciechowski (608) 266-2112
July 25, 2022

The following agenda describes the issues that the Board plans to consider at the meeting. At the time of the meeting, items may be removed from the agenda. Please consult the meeting minutes for a record of the actions of the Board.

AGENDA

11:00 A.M.

OPEN SESSION – CALL TO ORDER – ROLL CALL

A. Adoption of Agenda (1-3)

B. Reminders: Conflicts of Interests, Scheduling Concerns

C. Administrative Matters – Discussion and Consideration

- 1) Department, Staff and Board Updates
- 2) Board Members – Term Expiration Dates
 - a. Edelstein, Janice A. – 7/1/2024
 - b. Guyton, Vera L. – 7/1/2025
 - c. McFarland, Rosalyn – 7/1/2026
 - d. Saldivar Frias, Christian – 7/1/2023
 - e. Scott, Linda D. – 7/1/2023
 - f. Weinman, Robert W. – 7/1/2023
 - g. Zentz, Emily – 7/1/2023

D. Presentations of Petitions for Summary Suspension and for Designation of Hearing Official

- 1) 11:00 A.M. APPEARANCE – Gretchen Mrozinski, DLSC Attorney; Kristina C. Turner, R.N., Respondent; and Steven Jesser, Attorney for the Respondent: 22 NUR 122 – Kristina C. Turner, R.N. **(4-39)**

E. Discussion and Consideration of Items Added After Preparation of Agenda:

- 1) Introductions, Announcements and Recognition
- 2) Administrative Matters
- 3) Election of Officers
- 4) Appointment of Liaisons and Alternates
- 5) Delegation of Authorities
- 6) Education and Examination Matters
- 7) Credentialing Matters
- 8) Practice Matters
- 9) Legislative and Policy Matters

- 10) Administrative Rule Matters
- 11) Liaison Reports
- 12) Board Liaison Training and Appointment of Mentors
- 13) Informational Items
- 14) Division of Legal Services and Compliance (DLSC) Matters
- 15) Presentations of Petitions for Summary Suspension
- 16) Petitions for Designation of Hearing Examiner
- 17) Presentation of Stipulations, Final Decisions and Orders
- 18) Presentation of Proposed Final Decisions and Orders
- 19) Presentation of Interim Orders
- 20) Petitions for Re-Hearing
- 21) Petitions for Assessments
- 22) Petitions to Vacate Orders
- 23) Requests for Disciplinary Proceeding Presentations
- 24) Motions
- 25) Petitions
- 26) Appearances from Requests Received or Renewed
- 27) Speaking Engagements, Travel, Public Relation Requests, and Reports

F. Public Comments

CONVENE TO CLOSED SESSION to deliberate on cases following hearing (s. 19.85(1)(a), Stats.); to consider licensure or certification of individuals (s. 19.85(1)(b), Stats.); to consider closing disciplinary investigations with administrative warnings (ss. 19.85(1)(b), and 440.205, Stats.); to consider individual histories or disciplinary data (s. 19.85(1)(f), Stats.); and to confer with legal counsel (s. 19.85(1)(g), Stats.).

G. Deliberation on Division of Legal Services and Compliance Matters

- 1) **Proposed Stipulations and Interim Order**
 - a. 22 NUR 058, 22 NUR 059 – Kandise L. Sporer, R.N. **(40-44)**

H. Deliberation on Petitions for Summary Suspension and Designation of Hearing Official

- 1) 22 NUR 122 – Kristina C. Turner, R.N. **(45)**

I. Deliberation of Items Added After Preparation of the Agenda

- 1) Education and Examination Matters
- 2) Credentialing Matters
- 3) DLSC Matters
- 4) Monitoring Matters
- 5) Professional Assistance Procedure (PAP) Matters
- 6) Petitions for Summary Suspensions
- 7) Petitions for Designation of Hearing Examiner
- 8) Proposed Stipulations, Final Decisions and Order
- 9) Proposed Interim Orders
- 10) Administrative Warnings
- 11) Review of Administrative Warnings
- 12) Proposed Final Decisions and Orders
- 13) Matters Relating to Costs/Orders Fixing Costs
- 14) Case Closings
- 15) Board Liaison Training
- 16) Petitions for Assessments and Evaluations

- 17) Petitions to Vacate Orders
- 18) Remedial Education Cases
- 19) Motions
- 20) Petitions for Re-Hearing
- 21) Appearances from Requests Received or Renewed

J. Consulting with Legal Counsel

RECONVENE TO OPEN SESSION IMMEDIATELY FOLLOWING CLOSED SESSION

K. Vote on Items Considered or Deliberated Upon in Closed Session if Voting is Appropriate

L. Open Session Items Noticed Above Not Completed in the Initial Open Session

ADJOURNMENT


NEXT MEETING: AUGUST 11, 2022

MEETINGS AND HEARINGS ARE OPEN TO THE PUBLIC, AND MAY BE CANCELLED WITHOUT NOTICE.

Times listed for meeting items are approximate and depend on the length of discussion and voting. All meetings are held virtually unless otherwise indicated. In-person meetings are typically conducted at 4822 Madison Yards Way, Madison, Wisconsin, unless an alternative location is listed on the meeting notice. In order to confirm a meeting or to request a complete copy of the board's agenda, please visit the Department website at <https://dsps.wi.gov>. The board may also consider materials or items filed after the transmission of this notice. Times listed for the commencement of disciplinary hearings may be changed by the examiner for the convenience of the parties. Requests for interpreters for the hard of hearing, or other accommodations, are considered upon request by contacting the Affirmative Action Officer at 608-266-2112, or the Meeting Staff at 608-266-5439.

**State of Wisconsin
Department of Safety & Professional Services**

AGENDA REQUEST FORM

1) Name and title of person submitting the request: Paralegal Steve Engelbrecht on behalf of Attorney Gretchen Mrozinski, Division of Legal Services and Compliance		2) Date when request submitted: July 18, 2022 Items will be considered late if submitted after 12:00 p.m. on the deadline date which is 8 business days before the meeting	
3) Name of Board, Committee, Council, Sections: Board of Nursing			
4) Meeting Date: July 25, 2022	5) Attachments: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	6) How should the item be titled on the agenda page? Presentation of Petition for Summary Suspension in Case Number 22 NUR 122, Kristina C. Turner, R.N.	
7) Place Item in: <input type="checkbox"/> Open Session <input checked="" type="checkbox"/> Closed Session	8) Is an appearance before the Board being scheduled? (If yes, please complete Appearance Request for Non-DSPS Staff) <input checked="" type="checkbox"/> Yes DLSC Attorney Gretchen Mrozinski <input type="checkbox"/> No	9) Name of Case Advisor(s), if applicable: Vera Guyton, L.P.N.	
10) Describe the issue and action that should be addressed: The Board must decide whether to grant the Petition for Summary Suspension. In open session, the Board will hear the Division's Presentation of the Petition for Summary Suspension concerning Kristina C. Turner, R.N., including the evidence to support the Petition. Respondent has the right to appear during open session to be heard and will have received notice of the Presentation prior to the Board meeting.			
11)	Authorization 		7/18/2022
Signature of person making this request		Date	
Supervisor (Only required for post agenda deadline items)		Date	
Executive Director signature (Indicates approval for post agenda deadline items)		Date	
Directions for including supporting documents: 1. This form should be saved with any other documents submitted to the Agenda Items folders. 2. Post Agenda Deadline items must be authorized by a Supervisor and the Policy Development Executive Director. 3. If necessary, provide original documents needing Board Chairperson signature to the Bureau Assistant prior to the start of a meeting.			

STATE OF WISCONSIN
BEFORE THE BOARD OF NURSING

IN THE MATTER OF DISCIPLINARY :
PROCEEDINGS AGAINST :
 : DLSC Case No. 22 NUR 122
KRISTINA C. TURNER, R.N., :
RESPONDENT. :

NOTICE OF PRESENTATION OF PETITION FOR SUMMARY SUSPENSION

To: Kristina C. Turner, R.N.
25570 W. Wacker Drive
Lake Villa, IL 60046

PLEASE TAKE NOTICE that the Petitioner, Wisconsin Department of Safety and Professional Services, Division of Legal Services and Compliance, will present the attached Petition for Summary Suspension to the Wisconsin Board of Nursing at the following date, time and place:

Date: Monday July 25, 2022
Time: 11:00 a.m.
Place: Virtual Board Meeting (Respondent will receive an appearance notification including information regarding how to connect virtually to the Board meeting.)

Dated at Madison, Wisconsin this 18th day of July 2022.



Gretchen Mrozinski, Prosecuting Attorney
State Bar Number 1027075
Department of Safety and Professional Services
Division of Legal Services and Compliance
P.O. Box 7190
Madison, WI 53707-7190
(608) 266-5858
Gretchen2.Mrozinski@wisconsin.gov

STATE OF WISCONSIN
BEFORE THE BOARD OF NURSING

IN THE MATTER OF DISCIPLINARY :
PROCEEDINGS AGAINST :
 : DLSC Case No. 22 NUR 122
KRISTINA C. TURNER, R.N., :
RESPONDENT. :

PETITION FOR SUMMARY SUSPENSION
Wis. Stat. § 227.51(3) and Wis. Admin. Code Ch. SPS 6

Gretchen Mrozinski, being duly sworn on oath, upon information and belief, deposes and states, as follows:

1. I am an attorney employed by the Wisconsin Department of Safety and Professional Services (Department), Division of Legal Services and Compliance (Division), and in the course of my job duties have been assigned to the investigation and prosecution of Division case no. 22 NUR 122 against Respondent Kristina C. Turner, R.N. for the Wisconsin Board of Nursing (Board).

2. My business address is 4822 Madison Yards Way, Madison, Wisconsin 53705, and my business mailing address is Post Office Box 7190, Madison, Wisconsin 53707-7190.

3. Kristina C. Turner, R.N. (Respondent) (YOB: 1990) is licensed in the state of Wisconsin to practice nursing, having license number 257202-30, first issued on November 11, 2020, and current through February 28, 2022.¹

4. The most recent address on file with the Wisconsin Department of Safety and Professional Services (Department) for Respondent is 25570 W. Wacker Drive, Lake Villa, Illinois 60046.

5. On February 23, 2022, the Department received a complaint reporting that Froedtert Kenosha Hospital and Emergency Department (Facility) terminated Respondent for testing positive for cocaine and marijuana during an employee drug screen. On February 24, 2022, Division Case No. 22 NUR 122 was opened to investigation the allegations.

¹ Respondent has not attempted to renew her RN credential, but because of Wisconsin's Emergency Order currently in place due to the COVID-19 pandemic, health care provider licenses will remain "active" until 30 days after the Order ends.

6. On October 25, 2021, Respondent was hired as a full-time registered nurse at the Facility in Kenosha, Wisconsin.

7. On February 6, 2022, the Facility received an email from Respondent's former fiancé that reported Respondent had been ingesting cocaine and Norco almost daily for the last five weeks, and that she had been coming to work and working under the influence of cocaine.

8. On February 7, 2022, the Facility received another email that appeared to be from Respondent's former fiancé. The email stated that the prior emails were 100% false, the writer and Respondent had ended their relationship, and that the writer had emailed the false allegations to punish Respondent for ending their relationship.

9. On February 7, 2022, Facility staff interviewed Respondent and she stated that she had recently ended an abusive relationship with her boyfriend and moved out of his home the past weekend; her boyfriend had sent the emails accusing her of behaviors that she was not involved in; she did not know the content of the emails; she had smoked marijuana and used cocaine in the past, but she no longer does; she does not consume any illegal drugs; she has never taken any drugs from the Facility; and she never came to work under the influence of illegal drugs or alcohol.

10. On February 7, 2022, at the request of the Facility, Respondent underwent a witnessed urine drug screen. The urine drug screen was positive for cocaine and marijuana.

11. Respondent advised the Facility that she did not think the drug test would come back positive since she ingested cocaine and marijuana five (5) days prior to taking the test.

12. On February 22, 2022, Respondent was terminated from her position at the Facility.

13. On March 9, 2022, a Division investigator, on behalf of the Wisconsin Board of Nursing (Board), emailed Respondent at her email address on file with the Department (kturner3790@gmail.com) asking for a response to the allegations of the complaint. No response was received.

14. On March 25, 2022, a Division investigator, on behalf of the Board, emailed Respondent again at her email address on file with the Department (kturner3790@gmail.com), asking for a response to the allegations of the complaint. No response was received.

15. On April 5, 2022, a Division investigator, on behalf of the Board, mailed a letter via Certified Mail to Respondent at her mailing address on file with the Department, (as listed above), asking for a response to the allegations of the complaint. No response was received.

16. On April 19, 2022, a Division investigator, on behalf of the Board, mailed a letter via regular U.S. Mail to Respondent at her mailing address on file with the Department, (as listed above), asking for a response to the allegations of the complaint. No response was received.

17. On April 28, 2022, a Division investigator, on behalf of the Board, attempted to call Respondent at her phone number on file with the Department, but an automated message stated that the number cannot receive calls.

18. On April 28, 2022, a Division investigator, on behalf of the Board, attempted to email Respondent at two possible email addresses found on Lexis Nexis (irocku41@aol.com and kat8_86@hotmail.com), asking for a response to the allegations of the complaint. The hotmail email was undeliverable. No response was received.

19. By the conduct described above, Respondent committed unsafe practice or substandard care by being unable to practice safely by reason of alcohol or other substance abuse within the meaning of Wis. Admin. Code § N 7.03(6)(f).

20. By the conduct described above, Respondent obtained, possessed, or attempted to obtain or possess, a drug without lawful authority within the meaning of Wis. Admin. Code § N 7.03(8)(e).

21. By the conduct described above, Respondent committed acts which show Respondent to be unfit or incompetent by reason of negligence, abuse of alcohol or other drugs or mental incompetency within the meaning of Wis. Stat. § 441.07(1g)(c).

22. By the conduct described above, Respondent failed to cooperate in a timely manner with the Board's investigation of a complaint filed against Respondent within the meaning of Wis. Admin. Code § N 7.03(1)(c), and Wis. Stat. § 440.20(5).

23. As a result of the above conduct, Respondent is subject to discipline pursuant to Wis. Stat. § 441.07(1g)(b), (c), and (d) and Wis. Admin. Code § N 7.03.

24. On May 25, 2022 a formal complaint alleging that Respondent engaged in unprofessional conduct was filed with the Wisconsin Department of Administration, Division of Hearings and Appeals.

25. On June 23, 2022, Respondent filed an Answer to the formal complaint, and the case then proceeded towards an Administrative Hearing. Without a summary suspension of Respondent's license or an interim order suspending Respondent's license, Respondent would be able to practice nursing until the Administrative Hearing concludes and the Board has issued a final decision and order in this case. It is probable that the hearing will not conclude and that the Board will not issue a final decision and order until early 2023.

26. It is imperatively required and necessary to suspend Respondent's license to practice as a registered nurse immediately to protect the public health, safety and welfare.

WHEREFORE, the Division of Legal Services and Compliance requests that the Board:

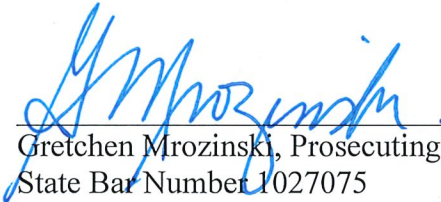
1. Find that notice has been given to Respondent pursuant to Wis. Admin. Code § SPS 6.05.

2. Find probable cause to believe that Respondent has engaged in, or is likely to engage in, conduct such that the public health, safety or welfare imperatively requires emergency suspension of Respondent's license to practice as a registered nurse.

3. Issue an order summarily suspending Respondent's license to practice as a registered nurse in the state of Wisconsin (license number 257202-30) and order that such suspension continue until the effective date of a final decision and order issued in the disciplinary proceeding against Respondent, unless otherwise ordered by the Board.

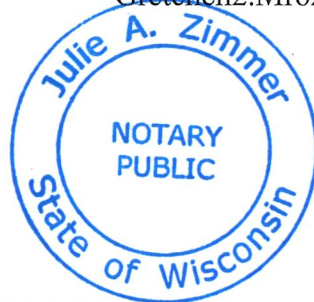
STATE OF WISCONSIN)
) ss
COUNTY OF DANE)

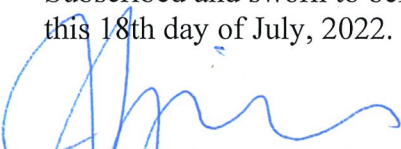
Gretchen Mrozinski, being first duly sworn on oath, deposes and says that she is an attorney for the State of Wisconsin, Department of Safety and Professional Services, Division of Legal Services and Compliance, and that she has read the foregoing petition and knows the contents thereof and that the same is true to her own knowledge, except as to those matters therein stated on information and belief, and as to such matters, she believes them to be true.



Gretchen Mrozinski, Prosecuting Attorney
State Bar Number 1027075
Department of Safety and Professional Services
Division of Legal Services and Compliance
P.O. Box 7190
Madison, WI 53707-7190
(608) 266-5858
Gretchen2.Mrozinski@wisconsin.gov

Subscribed and sworn to before me
this 18th day of July, 2022.





Notary Public
My Commission expires is permanent.

STATE OF WISCONSIN
BEFORE THE BOARD OF NURSING

IN THE MATTER OF DISCIPLINARY :
PROCEEDINGS AGAINST :
 : AFFIDAVIT OF SERVICE
KRISTINA C. TURNER, R.N., :
RESPONDENT. :

Division of Legal Services and Compliance Case No. 22 NUR 122

Steve Engelbrecht, being first duly sworn on oath deposes and states that he is in the employ of the Department of Safety and Professional Services, Division of Legal Services and Compliance, on July 18, 2022, served on Respondent a Notice of Presentation of Petition for Summary Suspension, dated July 18, 2022; a Petition for Summary Suspension, dated July 18, 2022; and Petition for Designation of Hearing Official dated July 18, 2022, by:

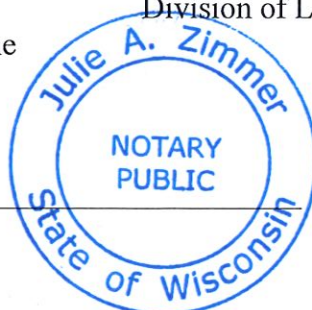
1. Mailing a true and accurate copy by certified mail with a return receipt requested in an envelope properly stamped and addressed to Respondent at 25570 W. Wacker Drive, Lake Villa, Illinois 60046. Certified number 7020 1810 0000 1290 2162.
2. Mailing a true and accurate copy by regular mail in an envelope properly stamped and addressed to Respondent at 25570 W. Wacker Drive, Lake Villa, Illinois 60046.
3. Mailing a true and accurate copy by regular mail in an envelope properly stamped and addressed to Respondent's Attorney, Steven H. Jesser, Steven H. Jesser, Attorney at Law, P.C. at 2700 Patriot Boulevard, Suite 250, Glenview, Illinois 60026.
4. Mailing a true and accurate copy by electronic mail to Respondent at kturner3790@gmail.com
5. Mailing a true and accurate copy by electronic mail to Respondent's Attorney, Steven H. Jesser at shj@sjesser.com.

Steve Engelbrecht

Steve Engelbrecht
Department of Safety and Professional Services
Division of Legal Services and Compliance

Subscribed and sworn to before me
this 18th day of July, 2022.

[Signature]
Notary Public
My Commission is permanent



STATE OF WISCONSIN
BEFORE THE BOARD OF NURSING

IN THE MATTER OF DISCIPLINARY :
PROCEEDINGS AGAINST :
 : DLSC Case No. 22 NUR 122
KRISTINA C. TURNER, R.N., :
RESPONDENT. :

AFFIDAVIT OF SHANDA BINDL

STATE OF WISCONSIN)
) ss
COUNTY OF DANE)

Shanda Bindl, being duly under oath, deposes and states, as follows:

1. I am a consumer protection investigator employed by the Wisconsin Department of Safety and Professional Services, Division of Legal Services and Compliance (Division), and in the course of my professional duties have been assigned to the investigation of Division case no. 22 NUR 122 against Respondent Kristina C. Turner, R.N. for the Wisconsin Board of Nursing.

2. My business address is 4822 Madison Yards Way, Madison, Wisconsin 53705, and my business mailing address is Post Office Box 7190, Madison, Wisconsin 53707-7190.

3. The allegations in Division case no. 22 NUR 122 are that Respondent uses and/or recently used cocaine and opioids not prescribed to her; and, Respondent tested positive for cocaine and marijuana via a facility reasonable suspicion drug test.

4. On March 9, 2022, I emailed Respondent at her email address on file with the Department (kturner3790@gmail.com) asking for a response to the allegations of the complaint. No response was received.

5. On March 25, 2022, I emailed Respondent again at her email address on file with the Department (kturner3790@gmail.com), asking for a response to the allegations of the complaint. No response was received.


6. On April 5, 2022, I mailed a letter via Certified Mail to Respondent at her mailing address on file with the Department, (25570 W. Wacker Drive, Lake Villa, IL 60046), asking for a response to the allegations of the complaint. No response was received.

7. On April 19, 2022, I mailed a letter via regular U.S. Mail to Respondent at her mailing address on file with the Department, (25570 W. Wacker Drive, Lake Villa, IL 60046), asking for a response to the allegations of the complaint. No response was received.

8. On April 28, 2022, I attempted to call Respondent at her phone number on file with the Department (847-977-1668), but an automated message stated that the number cannot receive calls.

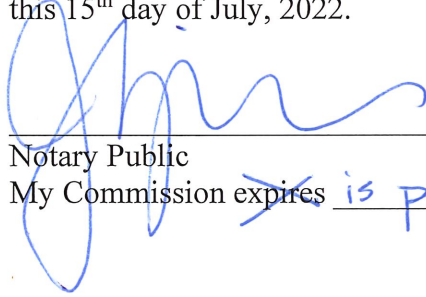
9. On April 28, 2022, I attempted to email Respondent at two possible email addresses found on Lexis Nexis (irocku41@aol.com and kat8_86@hotmail.com), asking for a response to the allegations of the complaint. The hotmail email was undeliverable. No response was received.

10. I make this affidavit in support of the Petition for Summary Suspension in the above-captioned matter, based upon my personal knowledge.

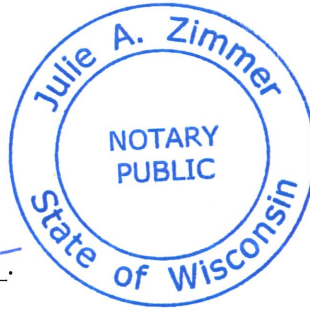


Shanda Bindl
Consumer Protection Investigator

Subscribed and sworn to before me
this 15th day of July, 2022.



Notary Public
My Commission expires is permanent.



STATE OF WISCONSIN
BEFORE THE BOARD OF NURSING

IN THE MATTER OF DISCIPLINARY
PROCEEDINGS AGAINST

KRISTINA C. TURNER, R.N.,
RESPONDENT.

DLSC Case No. 22 NUR 122

AFFIDAVIT OF GRETCHEN MROZINSKI

STATE OF WISCONSIN)
) ss
COUNTY OF DANE)

Gretchen Mrozinski, being duly under oath, deposes and states, as follows:


1. I am an attorney employed by the Wisconsin Department of Safety and Professional Services, Division of Legal Services and Compliance (Division), and in the course of my professional duties have been assigned to the investigation and prosecution of Division case no. 22 NUR 122 against Respondent Kristina C. Turner, R.N. for the Wisconsin Board of Nursing.

2. My business address is 4822 Madison Yards Way, Madison, Wisconsin 53705, and my business mailing address is Post Office Box 7190, Madison, Wisconsin 53707-7190.

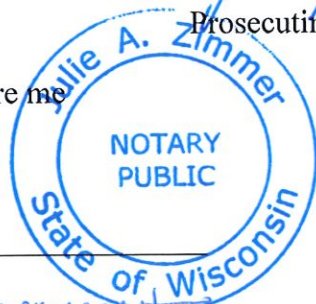
3. In the course of my professional duties, I reviewed the following documents which are contained in the Department's file for this matter:

- a. Complaint from Nicholas Galich, Vice President of Froedtert South (and attachments) (Exhibit A).
- b. Certified Froedtert Investigative File (Exhibit B).

4. I make this affidavit in support of the Petition for Summary Suspension in the above-captioned matter, and based upon my personal knowledge.


Gretchen Mrozinski
Prosecuting Attorney

Subscribed and sworn to before me
this 18th day of July, 2022.




Notary Public
My Commission expires is permanent.

Sent via Certified Mail: 7021 2720 0001 0748 7707

Sent via E-mail: dsps@wisconsin.gov

February 22, 2022

Department of Safety and Professional Services
Attn: Board of Nursing
P.O. Box 8366
Madison, WI 53708-8366

Subject: Termination of Employment – Kristina Turner, RN – License 257202

Re: Letter, T. Harold to K. Turner, February 22, 2022

To Whom It May Concern:

This letter and its attachment serve as notice to the Board of Nursing that Kristina Turner, RN was terminated from her employment at Froedtert South following a positive drug test for Cocaine and Marijuana. This letter is intended to comply with N 7.03 (1) (i) for all the licensees who were involved in this case employed by Froedtert South.

If you would like additional information, please send me a subpoena along with the information that is being requested to nicholas.galich@froedtertsouth.com.

If you should have any questions, please feel free to reach out to me.

Sincerely,



Nicholas Galich
Vice President
Froedtert South

6308 8th Avenue
Kenosha, WI 53143
(p) 262.656.3267
(e) nicholas.galich@froedtertsouth.com

Enclosure: Letter, T. Harold to K. Turner, February 22, 2022

Exhibit A 1

February 22, 2022

CERTIFIED MAIL: 7018 3090 0000 8135 1154

Kristina C. Turner
25570 W. Wacker Drive
Lake Villa, Illinois 60046

REFERENCE: Investigatory Meeting, February 7, 2022, at Froedtert Pleasant Prairie Hospital regarding emails received on Sunday, February 6, 2022, and Monday, February 7, 2022, from email account jczujy10@gmail.com regarding employee Kristina Turner

SUBJECT: Results of Investigatory Meeting on February 7, 2022

Dear Ms. Turner:

As you are aware, the above-referenced investigatory meeting took place at Froedtert Pleasant Prairie Hospital on February 7, 2022. Present at the meeting were: you; Terri Harold, RN, Director of Emergency Services; and Jill Hall, Human Resources Representative. As explained, the purpose of the meeting was to collect facts regarding emails received from email account jczujy10@gmail.com on Sunday, February 6, 2022, and Monday, February 7, 2022. A summary and results of the investigatory meeting are as follows:

- You confirmed that on October 25, 2021, you were hired as a full-time RN to work in the Froedtert Kenosha Hospital Emergency Department;
- At the start of the investigatory meeting, you acknowledged the importance of being truthful during the meeting and that untruthfulness could lead to further corrective action, up to and including discharge;
- Documentation in Net Learning confirmed that you viewed Froedtert South's Corrective Action Policy #1920.00 and signed off on the policy on December 29, 2021;
- You stated that you were aware of the emails sent from email account jczujy10@gmail.com on Sunday, February 6, 2022, and that you were sitting next to the sender when they were sent; however, you were unaware of the content;
- You shared that the sender was your boyfriend up until Sunday, February 6, 2022, and that on that day, you broke up with him. You stated that he was angry and upset, so he sent false emails to Froedtert South recipients reporting that you were under the influence of illegal drugs while at work;
- You stated that you did not think of contacting your supervisor to inform her that she would be receiving these emails, which you claimed were false, and photos that you stated the sender staged to attempt to ruin your career as a nurse;

- When asked if you were aware that a third email had been sent from email account iczujy10@gmail.com on Monday, February 7, 2022, at 12:16 p.m., you responded that the sender called you after he had sent the email. You stated that he was remorseful and apologetic, and that he regretted sending the email on February 6, 2022;
- You stated that you do not use illegal drugs;
- You stated that you have smoked marijuana in the recent past and have used cocaine in the past;
- You stated that you have not stolen any medications from Froedtert South;
- You denied ever reporting to work under the influence of illegal drugs or alcohol;
- You denied being under the influence of illegal drugs or alcohol at the time of the meeting; and
- You believed that the drug screening you voluntarily submitted to at the Froedtert South Occupational Medicine Clinic prior to arriving at this meeting would be negative.

After the above mentioned meeting, you were immediately placed on an unpaid suspension pending further investigation by Jill Hall, Human Resources Representative.

On February 14, 2022, Employee Health was notified by Froedtert South's Occupational Medicine Clinic that your drug screening was positive for cocaine and marijuana. You were called by Jill Hall, Human Resources Representative, and she informed you that your drug screening reported positive for cocaine and marijuana. You stated that you did not think the drug test would result positive since you used the cocaine and marijuana five days prior to being tested.

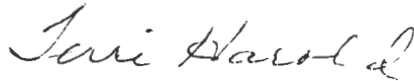
Your actions violate Froedtert South's Corrective Action Policy #1920.00 in the following areas:

- Demonstrating any form of dishonesty, including lying and falsifying documents or misrepresenting information during employment, including during an investigatory process, when you denied use of any illegal substances and your drug screening resulted positive for cocaine and marijuana;
- Engaging in behavior which creates an unsafe work environment or that is or could be detrimental to patient care, as there is no way to know for certain whether the illegal drugs you used adversely affected your ability to work and to safely care for patients; and
- Violation of Wisconsin State and Federal laws that prohibit the use of cocaine and marijuana.

As a result of the above violations, your employment with Froedtert South will be terminated, effective immediately. If there is any additional information that you believe we should know that would cause us to reconsider the Corrective Action taken against you, please notify us in writing within seventy-two (72) hours of receiving this letter.

In closing, and in light of the circumstances, I strongly encourage you to contact the Wisconsin board of nursing if you know that you have violated the Rules of Conduct for registered nurses in Wisconsin to avoid disciplinary action potentially being taken on your license should it become known that you have violated the Rules of Conduct.

Sincerely,

A handwritten signature in cursive script that reads "Terri Harold".

Terri Harold, RN
Director of Emergency Services

Sent via e-mail Shanda.bindl@wisconsin.gov

March 10, 2022

Shanda Bindl, Investigator
Department of Safety and Professional Services
P.O. Box 7190
Madison, WI 53707-7190

Re: Subpoena dated March 9, 2022, Kristina Turner, RN – Termination

Ms. Bindl:

Attached, please find the investigation documentation that was collected or prepared by Froedtert South, which ultimately led to Ms. Turner being terminated from employment on February 22, 2022.

I certify that to the best of my knowledge these are all the documents available related to Froedtert South’s investigation.

Should you have any further questions, please feel free to contact me.

Sincerely,



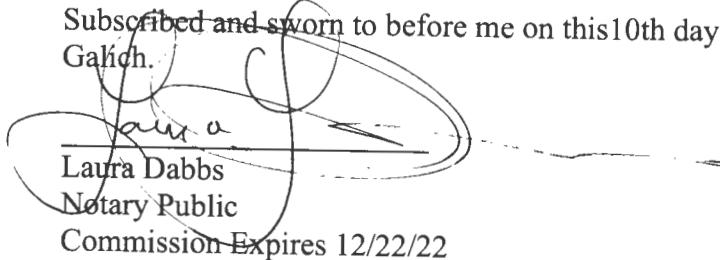
Nicholas Galich
Vice President
Froedtert South

6308 8th Avenue
Kenosha, WI 53143
(p) 262.656.3267
(e) nicholas.galich@froedtertsouth.com

NOTARY:

State of Wisconsin
County of Kenosha

Subscribed and sworn to before me on this 10th day of March in the year 2022 by Nicholas Galich.



Laura Dabbs
Notary Public
Commission Expires 12/22/22

Exhibit B 1

>
> Sent from my iPhone
>
>> On Feb 6, 2022, at 2:11 AM, jczujy10@gmail.com wrote:
>>
>> Hello Team,
>>
>> My name is John and I am Kristina's former fiancé . I feel it's my duty in the best interest of the hospital and your patience to know Kristina has been doing cocaine and norco almost daily for the last 5 weeks. She has done cocaine before coming to work and working with patience while under the influence of said cocaine. I feel that her selfish, careless actions need to be addressed before someone gets seriously injured, hospital sued, or someone dies due to her lack of being sober. I feel a supervised drug test needs to be done asap to protect the hospital and patients. I have attached a screen shot of tonight showing Kristina about to take norco and sniff cocaine using her driver's license to get it ready. This has been her routine for some time. I feel her having a nursing license is not appropriate if she continues to work there or some other hospital. Please feel free to reach out to me with any additional questions or if I need to come in person to fill out a statement. On behalf of Kristina, I'd like to apologize for her selfish, careless, illegal, actions and sorry you had to find out this way. I'd like to thank you for all you do in these hectic times and want to thank you for everything you do. I assure you the that Kristina's choices do not reflect anyway onto you and I hope the appropriate actions are taken so Ms. Turner is not put into another position of trust that could put people in danger!
>>
>> Thank you
>> John
>>
>>
>>
>> Sent from my iPhone

Sent from my iPhone

> On Feb 6, 2022, at 3:32 AM, jczujy10@gmail.com wrote:
>
> Please see attached! Taken Feb 5th.



STATE OF ILLINOIS
DRIVER'S LICENSE IDENTIFICATION CARD

1911248287 Issued 11/11/2019

TURNER
KRISTINA C.
2507 WACKER DRIVE
LAKE VILLA IL 60046

DOB 03/07/1990
FEMALE 5'7" 115 lbs HAZ Eyes BRN Hair

Kristina Turner

DRIVER'S LICENSE AND IDENTIFICATION CARD ARE NOT VALID UNLESS THEY ARE CURRENTLY EXPIRING OR EXPIRED. THE STATE WILL NOT REISSUE THE LICENSE OR IDENTIFICATION CARD.



CONFIDENTIAL
THIS DOCUMENT CONTAINS HIPAA PROTECTED INFORMATION

Froedtert South
Human Resources

Investigation Report

Report Date: February 7, 2022

Employee Involved: Kristina C. Turner

Position: FKH Emergency Department Nurse

Primary Location: Froedtert Kenosha Hospital

Shift/Hours: Nights / 72 hours per 2 weeks

Date of Hire: October 25, 2021

Description of Concern: On Sunday, February 6, 2022, at 2:11am and 3:33am an email sent by jcuju10@gmail.com, was received by several FS employees, reporting that Kristina was doing “Cocaine and Norco almost daily for the last 5 weeks.”
On Monday, the same individual sent an email to the same FS recipients at 12:19 pm retracting the the two other emails sent regarding Kristina Turner.

Investigation:

Kristina C. Turner reported to Occupational Medical Clinic at 4:10pm on February 7, 2022 for a voluntary, witnessed drug screen requested by Terri Harold via a phone conversation the afternoon on February 7, 2022. Kristina was asked to report to FPP to discuss with Terri Harold and Jill Hall, Human Resources representative, regarding the above emails.

Discussion: Kristina Turner arrived at FPP at 5pm. Terri Harold, Director ED, Kristina Turner and Jill Hall, HR Representative met in Conference room A. Meeting was prefaced with need to be truthful, confidentiality, she affirmed she was not recording and that there was not anything that would keep her from participating in the meeting. Jill Hall shared that she is there as her advocate. The following was discussed:

- Kristina C. Turner started as an ED RN on October 25, 2021,

Exhibit B 5

- Kristina acknowledged that she completed both the New Employee Orientation and the Emergency Department RN orientation;
- Kristina acknowledged that she was aware her now ex-boyfriend sent emails that accused her of behaviors that she is not involved in;
- When asked when Kristina knew her ex had sent these emails, she stated she was sitting next to him that Sunday morning, they were in a fight, however she did not know the content of the emails;
- When asked why Kristina did not contact her supervisor, knowing her boyfriend sent emails to her employer, she responded she did not know Terri was copied in;
- Kristina was tearful during investigatory and shared that she just ended that abusive relationship and moved out of his home this past weekend;
- When asked if she was aware that he had send another email this afternoon she responded that he called her after he had sent it. She stated he was remorseful and apologetic.
- Kristina acknowledged that she has smoked marijuana and she has used cocaine in the past, however no longer does;
- Kristina acknowledged that she does not consume any illegal drugs;
- Kristina denied ever taking any drug from Froedtert South;
- Kristina denied ever coming to work under the influence of drugs or alcohol;
- Kristina denied being under the influence of drugs or alcohol at this meeting;
- Kristina is confident that today's drug screen will come back negative.

Jill Hall explained as long as we receive a negative drug screen she can return to work for her shift on Thursday evening. Terri also shared that as a precaution, she can transfer her to the FPP campus for the next few weeks.

Jill Hall reminded employee if she is ever aware of this type of communication being sent to her employer, similar to what was received this past few days, she should immediately contact her supervisor or Human Resources

Recommendation/Action:

Will await results of drug screen and if negative, employee will be temporarily assigned to FPP Emergency Department.

Will forward a photo of ex-boyfriend to Security as precautionary.

Reported Submitted by:

Terri Harold
Director, Emergency Services

Jill Hall
Human Resources Representative

Exhibit B 6

Galich, Nicholas

From: jczujy10@gmail.com
Sent: Monday, February 7, 2022 12:16 PM
To: Harold, Terri; Baker, Pam; Baltess, Sharon; DL_Employee_Health
Cc: Fuck Face Slut Turner
Subject: Re: ER Nurse Kristina Turner Drug Abuse
Attachments: image0.jpeg; ATT00001.txt; image0.jpeg; image1.jpeg; ATT00002.txt

Hello,

I am writing you this email to inform you that these emails are 100 percent false. Kristina and I ended our relationship due to her finding someone else. Someone better then me and I didn't know how to cope with feeling so betrayed. This was a selfish, cowardly, disgusting attempt of me trying to get even. Kristina was moving her belongings out and I took her license to make her look like a drug abuser when it's not true. I was very drunk and I hope my careless horrible actions don't lead to Kristina being punished for something she didn't do. Kristina has worked so hard for becoming a nurse and she absolutely loves what she does. The norco is mine I have attached a picture to this email showing the bottle and that was cooking flour on the table. I understand this is horrible and I am truly disgusted with myself. I have done multiple tours in Afghanistan and I have been diagnosed with PTSD. This is no excuse for what I did and if I have to face a punishment for this I absolutely will because Kristina has worked way to hard for becoming an amazing nurse. Your hospital is very lucky to have her and the passion/commitment she brings to work everyday. Please don't think less of her or punish her for my disgusting attempt to get even when I couldn't handle losing her. I am beyond sorry and ashamed you had to read those messages and I hope we you can move past my despicable actions!

Thank you,

John

**UNITED OCCUPATIONAL MEDICINE
MRO VERIFICATION**

Employee Name **Kristina Turner** DOB: **03-07-1990** Company: **Froedtert South**

Company contacts _____

Date of interview _____ Contact phone: _____

Date employer told results 2/14/22 (: ____ hrs.) Reported to _____

Lab Medtox other _____

Test indication Pre-employment Random
 Post-accident Reasonable suspicion
 Return to duty Other

Results reported as:

Negative Positive
 Negative but Dilute Marijuana
 Cocaine
 Amphetamines
 Opiates
 Phencyclidine
 Other _____

Test not Performed (check one of following)


- refusal to test: specimen substituted
 or specimen adulterated
 or donor did not submit a sample

- canceled fatal or uncorrectable flaw (_____)
 (May need to repeat if completion of drug screen required.)
 or specimen unsuitable with explanation
 (No further action required unless a negative result is required)
 or specimen unsuitable without explanation
 (Immediate witnessed repeat)

EMPLOYER NOTIFIED OF RESULTS

Comments _____

5-day non-contact () Yes () No 10-day non-contact () Yes () No
(Donor received message, didn't call) (MRO and Employer unable to contact donor)

 _____ 14 Feb 22
James C. Foster, MD, MPH Richard Goldberg, MD, MPH Date
Certified Medical Review Officer Certified Medical Review Officer

This test was performed according to 49 CFR, Parts 40 and 382.

3 PART DRUGS OF ABUSE TEST REQUEST

SPECIMEN ID

V18B49045



Employer:

UNITED OCC MED/NON/MRO
ATTN: STACY KACHUR
10256 OLD GREEN BAY RD STE 140
PLEASANT PRAIRIE, WI 53158
P: 262-577-8150 F:

Account #

STEP 1 To be completed by COLLECTOR / DONOR

Social Security No, Employee No. or other Identification No. Specimen Type:
 Blood Urine
 Oral Fluid

Donor I.D. 03-07-1990

Donor Name (last, first) TURNER KRISTINA

Donor Daytime Phone 8479771668 Referring Phys. / Company Fredtett & South

DONOR CONSENT I certify that I provided my specimen to the collector, that the specimen container was sealed with a tamper-proof seal in my presence; and that the information provided on this form and on the label affixed to the specimen bottle is correct. I authorize MEDTOX to release the results of the tests to my employer, prospective employer, employer representative and/or their authorized healthcare professionals.

Signature KRW DATE 07/07/2022

Account # 110803

Test(s) Ordered

1202 587 87210 85513

OTHER

TEST CODE:

STEP 2 To be Completed by COLLECTOR

Indicate Reason for Test: Pre-employment Random Reasonable Suspicion Other (specify):

Return to Duty Follow-up Post Accident Periodic Medical

STEP 3 To be Completed by COLLECTOR

Specimen temperature must be read within 4 minutes of collection YES No, Remark Required

Specimen Temperature within range: (90°-100°F/32°-38°C)

120001

STEP 4 To be Completed by COLLECTOR

Collection Site Location: Facility and Address 28

Collection Site Phone No. (262) 217-3455 Fax No. (262) 217-3460

UNITED OCC MEDICINE
PLEASANT PRAIRIE, WI 53158

Date and Time of Collection Month 07 Day 07 Year 2022 Hour 16 Minutes 15

Remarks Concerning Collection Witnessed by m. Krause

I, the collector, by signing below certify that the specimen identified on this form is the specimen given to me by the donor identified above and that it has been collected, labeled, sealed and released to the Delivery Service noted in accordance with applicable requirements.

X Marym D...
Signature of Collector
Marym D...
(PRINT) Collector's Name (First, MI, Last)

SPECIMEN BOTTLE(S) RELEASED TO:
Name of Delivery Service Transferring Specimen to Lab

FedEx Local Courier

Other

STEP 5

V18B49045

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INSTRUCTIONS FOR COMPLETING DRUG TESTING CUSTODY AND CONTROL FORM

NOTE: Use ballpoint pen, press hard, and check all copies for legibility.

STEP 1.

If the information in STEP 1 has not been completed, collector /donor completes STEP 1. Then check the appropriate box below in the test(s) ordered section. Ensure donor provides his/her daytime phone #.

STEP 2.

Indicate reason for test - Check the appropriate box.

STEP 3.

Upon receiving specimen from donor, check specimen temperature. This must be accomplished within 4 minutes.

Check block marked "Yes" if temperature is within range.

If specimen temperature is not within range, check block marked "No," and complete remarks section.

STEP 4.

Secure cap on specimen bottle (containing at least 30ml of urine) and affix specimen bottle seal labelled A over the cap and down the sides of the specimen bottle. Make sure the bottle is closed securely.

Record date on specimen bottle seal.

Instruct donor to initial the specimen bottle seal and sign the donor consent on the form.

Complete STEP 4 with the name and address of the facility at which the collection is taking place.

List a business telephone number and fax where collector can be reached.

Record any unusual occurrences concerning the collection (e.g. donor refusal to provide information/sign certification statement, specimen collected under direct observation, suspected adulteration) in the remarks section.

Record date and time of collection.

Print and sign name as collector and check appropriate courier box.

*This constitutes the external chain of custody. Sample cannot be processed if this section is not completed properly.

COMPLETING THE COLLECTION PROCESS

Upon completing the STEPS above, give donor his/her copy, Copy 3.

Donor may leave the collection site at this point.

Place the specimen bottle and Copy 1 of the Drug Testing Custody and Control Form in the shipping container.

Secure the shipping container. On the shipping container seal, record your initials and the date.

Retain Copy 2 for your records.

UNITED OCCUPATIONAL MEDICINE
10256 OLD GREEN BAY ROAD, SUITE 140
PLEASANT PRAIRIE, WI 53158
(262) 217-3455

GENERAL CONSENT AND RELEASE TO BE DRUG AND/OR ALCOHOL TESTED

NOTE: This release does not constitute the employee's waiver of liability with respect to any person involved in the testing procedure. Neither can the employee be required to waive liability of any person involved in the testing procedure.

I, Kristina Turner hereby authorize Froedtert South
EMPLOYEE NAME (PRINT) **EMPLOYER (PRINT)**

to conduct any and all drug or alcohol tests on me as required by the terms and conditions of the Company's drug and/or alcohol abuse policy. In furtherance of this, I hereby authorize United Occupational Medicine, its physicians, nurses, and technicians to withdraw specimens of my urine, hair and/or breath for the purpose of determining the presence, content, and quantity of drugs, controlled or prescription substances and/or alcohol in my body.

In executing this Consent and Release, I understand and agree that my drug and/or alcohol test results must be disclosed to my Company's Medical Review Officer (if applicable) and my employer. I hereby release United Occupational Medicine, its physicians, nurses, breath alcohol technicians, technicians, and any other of its employees or agents properly involved with my tests from any and all claims or causes of actions which may result from the disclosure of those test results.

I hereby further consent and agree to waive any physician-patient privilege that may otherwise exist with respect to the confidentiality of my alcohol and/or drug test results.

Date 2/7/22 Employee Signature [Handwritten Signature]

Witness [Handwritten Signature]

Sent via Certified Mail: 7021 2720 0001 0748 7707
Sent via E-mail: dsps@wisconsin.gov

February 22, 2022

Department of Safety and Professional Services
Attn: Board of Nursing
P.O. Box 8366
Madison, WI 53708-8366

Subject: Termination of Employment – Kristina Turner, RN – License 257202

Re: Letter, T. Harold to K. Turner, February 22, 2022

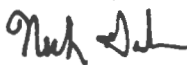
To Whom It May Concern:

This letter and its attachment serve as notice to the Board of Nursing that Kristina Turner, RN was terminated from her employment at Froedtert South following a positive drug test for Cocaine and Marijuana. This letter is intended to comply with N 7.03 (1) (i) for all the licensees who were involved in this case employed by Froedtert South.

If you would like additional information, please send me a subpoena along with the information that is being requested to nicholas.galich@froedtertssouth.com.

If you should have any questions, please feel free to reach out to me.

Sincerely,



Nicholas Galich
Vice President
Froedtert South

6308 8th Avenue
Kenosha, WI 53143
(p) 262.656.3267
(e) nicholas.galich@froedtertssouth.com

Enclosure: Letter, T. Harold to K. Turner, February 22, 2022

February 22, 2022

CERTIFIED MAIL: 7018 3090 0000 8135 1154

Kristina C. Turner
25570 W. Wacker Drive
Lake Villa, Illinois 60046

REFERENCE: Investigatory Meeting, February 7, 2022, at Froedtert Pleasant Prairie Hospital regarding emails received on Sunday, February 6, 2022, and Monday, February 7, 2022, from email account jczujy10@gmail.com regarding employee Kristina Turner

SUBJECT: Results of Investigatory Meeting on February 7, 2022

Dear Ms. Turner:

As you are aware, the above-referenced investigatory meeting took place at Froedtert Pleasant Prairie Hospital on February 7, 2022. Present at the meeting were: you; Terri Harold, RN, Director of Emergency Services; and Jill Hall, Human Resources Representative. As explained, the purpose of the meeting was to collect facts regarding emails received from email account jczujy10@gmail.com on Sunday, February 6, 2022, and Monday, February 7, 2022. A summary and results of the investigatory meeting are as follows:

- You confirmed that on October 25, 2021, you were hired as a full-time RN to work in the Froedtert Kenosha Hospital Emergency Department;
- At the start of the investigatory meeting, you acknowledged the importance of being truthful during the meeting and that untruthfulness could lead to further corrective action, up to and including discharge;
- Documentation in Net Learning confirmed that you viewed Froedtert South's Corrective Action Policy #1920.00 and signed off on the policy on December 29, 2021;
- You stated that you were aware of the emails sent from email account jczujy10@gmail.com on Sunday, February 6, 2022, and that you were sitting next to the sender when they were sent; however, you were unaware of the content;
- You shared that the sender was your boyfriend up until Sunday, February 6, 2022, and that on that day, you broke up with him. You stated that he was angry and upset, so he sent false emails to Froedtert South recipients reporting that you were under the influence of illegal drugs while at work;
- You stated that you did not think of contacting your supervisor to inform her that she would be receiving these emails, which you claimed were false, and photos that you stated the sender staged to attempt to ruin your career as a nurse;

Exhibit B 13

- When asked if you were aware that a third email had been sent from email account jczujy10@gmail.com on Monday, February 7, 2022, at 12:16 p.m., you responded that the sender called you after he had sent the email. You stated that he was remorseful and apologetic, and that he regretted sending the email on February 6, 2022;
- You stated that you do not use illegal drugs;
- You stated that you have smoked marijuana in the recent past and have used cocaine in the past;
- You stated that you have not stolen any medications from Froedtert South;
- You denied ever reporting to work under the influence of illegal drugs or alcohol;
- You denied being under the influence of illegal drugs or alcohol at the time of the meeting; and
- You believed that the drug screening you voluntarily submitted to at the Froedtert South Occupational Medicine Clinic prior to arriving at this meeting would be negative.

After the above mentioned meeting, you were immediately placed on an unpaid suspension pending further investigation by Jill Hall, Human Resources Representative.

On February 14, 2022, Employee Health was notified by Froedtert South's Occupational Medicine Clinic that your drug screening was positive for cocaine and marijuana. You were called by Jill Hall, Human Resources Representative, and she informed you that your drug screening reported positive for cocaine and marijuana. You stated that you did not think the drug test would result positive since you used the cocaine and marijuana five days prior to being tested.

Your actions violate Froedtert South's Corrective Action Policy #1920.00 in the following areas:

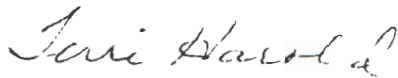
- Demonstrating any form of dishonesty, including lying and falsifying documents or misrepresenting information during employment, including during an investigatory process, when you denied use of any illegal substances and your drug screening resulted positive for cocaine and marijuana;
- Engaging in behavior which creates an unsafe work environment or that is or could be detrimental to patient care, as there is no way to know for certain whether the illegal drugs you used adversely affected your ability to work and to safely care for patients; and
- Violation of Wisconsin State and Federal laws that prohibit the use of cocaine and marijuana.

Kristina Turner
February 22, 2022
Page 3

As a result of the above violations, your employment with Froedtert South will be terminated, effective immediately. If there is any additional information that you believe we should know that would cause us to reconsider the Corrective Action taken against you, please notify us in writing within seventy-two (72) hours of receiving this letter.

In closing, and in light of the circumstances, I strongly encourage you to contact the Wisconsin board of nursing if you know that you have violated the Rules of Conduct for registered nurses in Wisconsin to avoid disciplinary action potentially being taken on your license should it become known that you have violated the Rules of Conduct.

Sincerely,

A handwritten signature in cursive script that reads "Terri Harold".

Terri Harold, RN
Director of Emergency Services

STATE OF WISCONSIN
BEFORE THE BOARD OF NURSING

IN THE MATTER OF DISCIPLINARY :
PROCEEDINGS AGAINST :
 : DLSC Case No. 22 NUR 122
KRISTINA C. TURNER, R.N., :
RESPONDENT. :

ORDER OF SUMMARY SUSPENSION

The Petition for Summary Suspension of the license of Kristina C. Turner, R.N., to practice as a registered nurse, dated July 18, 2022, was noticed to be presented to the Wisconsin Board of Nursing (Board) at 11:00 a.m., or as soon thereafter as the matter could be heard, on July 25, 2022. At that time, Attorney Gretchen Mrozinski appeared for the Petitioner, Department of Safety and Professional Services, Division of Legal Services and Compliance. Respondent appeared in person as did Respondent’s Attorney Steven H. Jesser.

The Board, having considered the sworn Petition for Summary Suspension; the Affidavits of Gretchen Mrozinski and attached exhibits, and the affidavit of Shanda Bindl, as evidence; the Affidavit of Service of Notice of Presentation and Petition for Summary Suspension of Steve Engelbrecht certifying that a true and accurate copy of the Notice of Presentation of Petition for Summary Suspension, Petition for Summary Suspension and Affidavits of Gretchen Mrozinski and Shanda Bindl were sent via certified and regular U.S. Mail, as well as by electronic mail, to Respondent on July 18, 2022, and to Respondent’s Attorney Steven H. Jesser by regular U.S. mail and electronic mail on July 18, 2022; and having heard the arguments of counsel, hereby makes the following:

FINDINGS OF FACT

1. Respondent Kristina C. Turner, R.N., (YOB: 1990) is licensed in the state of Wisconsin to practice nursing, having license number 257202-30, first issued on November 11, 2020, and current through February 28, 2022.¹
2. The most recent address on file with the Wisconsin Department of Safety and Professional Services (Department) for Respondent is 25570 W. Wacker Drive, Lake Villa, Illinois 60046.

¹ Respondent has not attempted to renew her RN credential, but because of Wisconsin’s Emergency Order currently in place due to the COVID-19 pandemic, health care provider licenses will remain “active” until 30 days after the Order ends.

3. On February 23, 2022, the Department received a complaint reporting that Froedtert Kenosha Hospital and Emergency Department (Facility) terminated Respondent for testing positive for cocaine and marijuana during an employee drug screen. On February 24, 2022, Division Case No. 22 NUR 122 was opened to investigate the allegations.

4. On October 25, 2021, Respondent was hired as a full-time registered nurse at the Facility in Kenosha, Wisconsin.

5. On February 6, 2022, the Facility received an email from Respondent's former fiancé that reported Respondent had been ingesting cocaine and Norco almost daily for the last five weeks, and that she had been coming to work and working under the influence of cocaine.

6. On February 7, 2022, the Facility received another email that appeared to be from Respondent's former fiancé. The email stated that the prior emails were 100% false, the writer and Respondent had ended their relationship, and that the writer had emailed the false allegations to punish Respondent for ending their relationship.

7. On February 7, 2022, Facility staff interviewed Respondent and she stated that she had recently ended an abusive relationship with her boyfriend and moved out of his home the past weekend; her boyfriend had sent the emails accusing her of behaviors that she was not involved in; she did not know the content of the emails; she had smoked marijuana and used cocaine in the past, but she no longer does; she does not consume any illegal drugs; she has never taken any drugs from the Facility; and she never came to work under the influence of illegal drugs or alcohol.

8. On February 7, 2022, at the request of the Facility, Respondent underwent a witnessed urine drug screen. The urine drug screen was positive for cocaine and marijuana.

9. Respondent advised the Facility that she did not think the drug test would come back positive since she ingested cocaine and marijuana five (5) days prior to taking the test.

10. On February 22, 2022, Respondent was terminated from her position at the Facility.

11. On March 9, 2022, a Division investigator, on behalf of the Wisconsin Board of Nursing (Board), emailed Respondent at her email address on file with the Department (kturner3790@gmail.com) asking for a response to the allegations of the complaint. No response was received.

12. On March 25, 2022, a Division investigator, on behalf of the Board, emailed Respondent again at her email address on file with the Department (kturner3790@gmail.com), asking for a response to the allegations of the complaint. No response was received.

13. On April 5, 2022, a Division investigator, on behalf of the Board, mailed a letter via Certified Mail to Respondent at her mailing address on file with the Department, (as listed above), asking for a response to the allegations of the complaint. No response was received.

14. On April 19, 2022, a Division investigator, on behalf of the Board, mailed a letter via regular U.S. Mail to Respondent at her mailing address on file with the Department, (as listed above), asking for a response to the allegations of the complaint. No response was received.

15. On April 28, 2022, a Division investigator, on behalf of the Board, attempted to call Respondent at her phone number on file with the Department, but an automated message stated that the number cannot receive calls.

16. On April 28, 2022, a Division investigator, on behalf of the Board, attempted to email Respondent at two possible email addresses found on Lexis Nexis (irocku41@aol.com and kat8_86@hotmail.com), asking for a response to the allegations of the complaint. The hotmail email was undeliverable. No response was received.

17. By the conduct described above, Respondent committed unsafe practice or substandard care by being unable to practice safely by reason of alcohol or other substance abuse within the meaning of Wis. Admin. Code § N 7.03(6)(f).

18. By the conduct described above, Respondent obtained, possessed, or attempted to obtain or possess, a drug without lawful authority within the meaning of Wis. Admin. Code § N 7.03(8)(e).

19. By the conduct described above, Respondent committed acts which show Respondent to be unfit or incompetent by reason of negligence, abuse of alcohol or other drugs or mental incompetency within the meaning of Wis. Stat. § 441.07(1g)(c).

20. By the conduct described above, Respondent failed to cooperate in a timely manner with the Board's investigation of a complaint filed against Respondent within the meaning of Wis. Admin. Code § N 7.03(1)(c), and Wis. Stat. § 440.20(5).

21. As a result of the above conduct, Respondent is subject to discipline pursuant to Wis. Stat. § 441.07(1g)(b), (c), and (d) and Wis. Admin. Code § N 7.03.

CONCLUSIONS OF LAW

1. The Board has jurisdiction over this matter pursuant to Wis. Stat. § 441.07 and has authority to summarily suspend the license of Respondent to practice as a registered nurse in the state of Wisconsin, pursuant to Wis. Stat. § 227.51(3) and Wis. Admin. Code ch. SPS 6.

2. Proper and sufficient notice of the Petition for Summary Suspension was provided to Respondent as required by Wis. Admin. Code § SPS 6.05.

3. Based on the sworn Petition and affidavits of Gretchen Mrozinski and Shanda Bindl, there is probable cause to believe that unprofessional conduct has occurred as set forth in the Findings of Fact and it is necessary to suspend the license of Respondent immediately to protect the public health, safety or welfare.

ORDER

1. The license of Respondent to practice as a registered nurse in the state of Wisconsin, as well as her right to apply for renewal of such license, is summarily suspended until the effective date of a final decision and order issued in the disciplinary proceeding against Respondent, unless otherwise ordered by the Board.

2. Respondent is notified of her right, pursuant to Wis. Admin. Code § SPS 6.09, to request a hearing to show cause why this summary suspension order should not be continued and is further notified that any request for a hearing to show cause should be filed with the Wisconsin Board of Nursing, 4822 Madison Yards Way, Post Office Box 8366, Madison, Wisconsin 53708-8366.

3. In the event that Respondent requests a hearing to show cause why the summary suspension should not be continued, that hearing shall be scheduled to be heard on a date within 20 days of receipt by the Board of Respondent's request for hearing, unless Respondent requests or agrees to a later time for the hearing.

WISCONSIN BOARD OF NURSING

By: _____
A Member of the Board

Date

STATE OF WISCONSIN
BEFORE THE BOARD OF NURSING

IN THE MATTER OF DISCIPLINARY :
PROCEEDINGS AGAINST :
 : DLSC Case No. 22 NUR 122
KRISTINA C. TURNER, R.N., :
RESPONDENT. :

PETITION FOR DESIGNATION OF HEARING OFFICIAL

Gretchen Mrozinski, the attorney assigned to this matter, on behalf of the Department of Safety and Professional Services, Division of Legal Services and Compliance, requests the Wisconsin Board of Nursing (Board) designate under Wis. Stat. § 227.46(1), an administrative law judge employed by the Department of Administration to preside over a hearing to show cause provided for in Wis. Admin. Code § SPS 6.09. This request is made pursuant to Wis. Admin. Code §§ SPS 6.09 and 6.11(1)(a) and is based on the following:

1. The Petition for Summary Suspension, with accompanying attachments, in this matter was filed with the Board on July 18, 2022.

2. On July 18, 2022, Respondent was provided notice of the time and place of the presentation of the Petition for Summary Suspension or Limitation by certified mail with a return receipt requested in an envelope properly stamped and addressed to Respondent at her address of record at 25570 W. Wacker Drive, Lake Villa, Illinois 60046, and by regular mail in an envelope properly stamped and addressed to Respondent at her address of record at 25570 W. Wacker Drive, Lake Villa, Illinois 60046, and by email at Respondent’s email address.

3. On July 18, 2022, Respondent’s Attorney Steven H. Jesser was provided notice of the time and place of the presentation of the Petition for Summary Suspension or Limitation by regular mail in an envelope properly stamped and addressed to Respondent’s Attorney Steven Jesser at his address of record at 2700 Patriot Boulevard, Suite 250. Glenview, Illinois 60026 and by email at Respondent’s Attorney Steven Jesser’s email address.

4. The Petition for Summary Suspension will be presented to the Board on July 25, 2022, at which time Respondent, Respondent’s attorney, and the prosecuting attorney may be present and will have the opportunity to be heard during the determination of probable cause by the Board.

5. On July 25, 2022, the Order of Summary Suspension may be issued by the Board.

6. Pursuant to Wis. Admin. Code § 6.09, Respondent is entitled to a hearing to show cause why an Order of Summary Suspension should not be continued.

7. Petitioner requests the Board designate, under Wis. Stat. § 227.46(1), an administrative law judge employed by the Department of Administration to preside over a hearing to show cause provided for in Wis. Admin. Code § SPS 6.09, in the event such hearing is requested.

Dated 18th of July 2022.



Gretchen Mrozinski, Prosecuting Attorney
State Bar Number 1027075
Department of Safety and Professional Services
Division of Legal Services and Compliance
P.O. Box 7190
Madison, WI 53707-7190
(608) 266-5858
Gretchen2.Mrozinski@wisconsin.gov

STATE OF WISCONSIN
BEFORE THE BOARD OF NURSING

IN THE MATTER OF DISCIPLINARY :
PROCEEDINGS AGAINST :
 : DLSC Case No. 22 NUR 122
KRISTINA C. TURNER, R.N., :
RESPONDENT. :

ORDER FOR DESIGNATION OF HEARING OFFICIAL

The Wisconsin Board of Nursing, having considered the Petition for Designation of Hearing Official dated July 18, 2022, grants the petition and, pursuant to the authority of Wis. Stat. § 227.46(1) and Wis. Admin. Code § SPS 6.09 and 6.11, designates an administrative law judge employed by the Department of Administration to preside over a hearing to show cause, if any, and at the conclusion of the hearing, to make findings and an order as to whether the Order of Summary Suspension, dated July 25, 2022, should be continued.

IT IS FURTHER ORDERED that the date of the hearing will be on a date and time to be agreed upon by the parties and the hearing official in this matter, to be held at the Department of Administration, Division of Hearings and Appeals, at 4822 Madison Yards Way, Madison, WI 53705.

WISCONSIN BOARD OF NURSING

By: _____ Date _____
A Member of the Board