

BEFORE THE KANSAS STATE BOARD OF EDUCATION

In the Matter of Application for
Teaching License Submitted by
Amber R. Chambers

14-PPC-45

FINAL ORDER

NOW, on this 17th day of April, 2015, the above-captioned matter comes for consideration by the Kansas State Board of Education (Board) upon the Application for an Emergency Substitute License submitted by Amber R. Chambers.

WHEREUPON, a complaint was filed by the Kansas State Department of Education and Ms. Chambers had the opportunity to respond to the complaint. Ms. Chambers did not respond to the complaint. The complaint and supporting evidence were reviewed by the Professional Practices Commission (Commission).

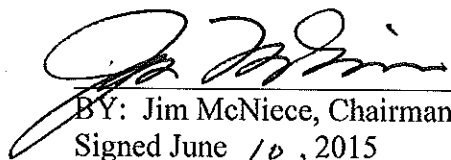
WHEREUPON the Board reviewed the Commission's Initial Order and after considering the presentation by Calin Kendall, Chairman of the Commission, who was available to answer the Board's questions and being otherwise duly advised in the premises, the Board adopted the Commission's findings of fact and conclusions of law by a vote of 10 - 0.

All findings set forth in the Commission's Initial Order attached hereto are incorporated by reference and made a part of this Final Order as though fully set forth at length herein.

IT IS THEREFORE CONCLUDED by the Kansas State Board of Education that Amber Chambers's Application for an Emergency Substitute License is denied.

This Final Order is made and entered this 17th day of April, 2015.

Kansas State Board of Education


BY: Jim McNiece, Chairman
Signed June 10, 2015

NOTICE TO APPLICANT

You may request a reconsideration of the above Order. To do so, you must file a Petition for Reconsideration with the Secretary to the State Board of Education, at the address stated below, within 15 days after service of this Final Order. The Petition must state the specific grounds upon which relief is requested.

The filing of a Petition for Reconsideration is not a prerequisite for seeking judicial review.

Peggy Hill
Secretary, KSBE
Landon State Office Building
900 SW Jackson Ave. Suite 600N
Topeka, Kansas 66612

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of June, 2015, a true and correct copy of the above and foregoing was mailed by certified mail, return receipt requested, to:

Amber Chambers
611 4th Street
Oswego, Kansas 67356

And via interoffice mail to:

Kelli M. Broers
Attorney, Kansas State Department of Education
Landon State Office Building
900 SW Jackson Ave., Suite 102
Topeka, Kansas 66612



Peggy Hill, Secretary
Kansas State Board of Education

**BEFORE THE KANSAS STATE BOARD OF EDUCATION
PROFESSIONAL PRACTICES COMMISSION**

In the Matter of Application for
Teaching License Submitted by
Amber R. Chambers

14-PPC-45

INITIAL ORDER

COMES NOW the Professional Practices Commission on this 26th day of February, 2015, and makes the following recommendations to the Kansas State Board of Education.

FINDINGS OF FACT

1. The Kansas State Department of Education filed a Complaint pursuant to K.A.R. 91-22-5a on December 5, 2014 [**Attached as Appendix I**]. That same Complaint was placed in the mail on December 5, 2014, by certified mail, return receipt requested, to the last known address of Amber Chambers (postmarked December 8, 2014). The attached certificate of service [**Exhibit A**] shows receipt of the Complaint.
2. Ms. Chambers applied for an Emergency Substitute License for the 2013-2014 school year in November 2013.
3. In her application, Ms. Chambers disclosed she had applied for and been denied a Kansas nursing license in September 2013. **Exhibit 1 of the Complaint**. She did not, however, provide the Kansas State Board of Nursing's Petition, which provides the factual basis for its denial of her application.
4. On April 12, 2013, the Kansas State Board of Nursing filed a Petition alleging Ms. Chambers had violated the Kansas Nurse Practice Act, K.S.A. 65-1120. **Exhibit 2 of the Complaint**. Therein, the Kansas State Board of nursing alleged:
 - a. Ms. Chambers had been arrested and charged with driving with her license cancelled/suspended/revoked in Craig County, Oklahoma;
 - b. In the District Court of Tulsa County, Oklahoma, she entered a plea to obtaining merchandise by false pretense on July 23, 2001;
 - c. In the District Court of Ottawa County, Oklahoma, she entered a plea to the charge of aggravated driving a motor vehicle under the influence, open container and failure to carry insurance on May 2, 2010;
 - d. In the District Court of Mayes County, Oklahoma, Ms. Chambers pled guilty to a drunk in a public place on January 11, 2010;

- e. Ms. Chambers' Oklahoma driver's license was revoked on March 8, 2010, for a chemical test failure;
 - f. Ms. Chambers failed to complete a recovery program;
 - g. Ms. Chambers was referred to KNAP for a chemical dependency evaluation on January 14, 2013;
 - h. On March 21, 2013, the KNAP case was closed because Ms. Chambers informed KNAP she no longer wanted to apply for a nursing license in Kansas and would not participate in the KNAP program; and
 - i. Ms. Chambers' Oklahoma nursing license had lapsed.
5. A hearing was scheduled regarding Ms. Chambers' application for a Kansas nursing license, and, Ms. Chambers did not appear. She claims she requested a continuance. However, a Proposed Default Order to Deny Application for License was filed on October 2, 2013. **Exhibit 2 of the Complaint.**
 6. On October 19, 2014, Ms. Chambers was arrested for driving under the influence in Cherokee County, Kansas. That case is currently set for a bench trial on April 14, 2015. **Exhibit B.**
 7. On November 14, 2014, Ms. Chambers committed a crime of which the victim was a four-year-old child. Charges have been filed in Labette County, Kansas District Court Case No. 2014-CR-281 (Parsons).
 8. Ms. Chambers did not file a Request for a Hearing nor did she submit an Answer. The Complaint specifically advises that "If no answer is filed within 20 days, Applicant will be deemed to have admitted the allegations contained in the complaint and acquiesced in the proposed action."

CONCLUSIONS

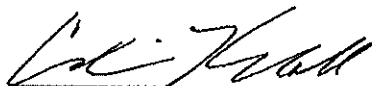
1. Pursuant to K.S.A. 72-8501, the Legislature has declared teaching and school administration to be professions in Kansas with all the similar rights, responsibilities and privileges accorded other legally recognized professions. An educator is in a position of public trust.
2. It is within the authority of the Kansas State Board of Education to adopt rules and regulations providing for the issuance, renewal, reinstatement and revocation of a license to teach.
3. By order of the Kansas State Board of Education, the Professional Practices Commission shall investigate and conduct hearings pertaining to allegations of misconduct.

4. A license may be denied by the Kansas State Board of Education for misconduct or other just cause. K.A.R. 91-22-1a.
5. If no answer to a Complaint is filed within 20 days, Applicant is deemed to have admitted the allegations contained in the Complaint and acquiesced in the proposed action. K.A.R. 91-22-9.
6. Ms. Chambers waived her right to an evidentiary hearing before the Professional Practices Commission and the State Board of Education. All findings of fact are based on the non-refuted claims stated in the sworn Complaint and the attached exhibit.
7. Ms. Chambers' conduct is inconsistent with the commonly-held perceptions and expectations of a member of the teaching profession. Such conduct violates the public trust and confidence placed in members of the profession. Furthermore, her conduct demonstrates a lack of fitness to perform the duties and responsibilities of a member of the teaching and school administration professions.
8. Ms. Chambers' misconduct and the loss of her Kansas nursing license and her subsequent misconduct are grounds for denial of her application for a license pursuant to K.A.R. 91-22-1a.

IT IS THEREFORE CONCLUDED by the Professional Practices Commission, by a vote of 8-0, subject to review by the State Board of Education, that Amber Chambers's Application for an Emergency Substitute License should be denied.

This Initial Order is made and entered this February 26, 2015.

PROFESSIONAL PRACTICES COMMISSION



Calin Kendall, Chairman

Order signed on 2/26, 2015.

NOTICE TO APPLICANT


This Order of the Professional Practices Commission is not a Final Order and is required to be reviewed by the State Board of Education in accordance with the provisions of the Kansas Administrative Procedure Act.

You may submit to the State Board of Education for its consideration as part of its review of the Initial Order, a written brief citing legal authority as to why the above recommendation should not be accepted. The legal brief must be filed with the Secretary of the Professional Practices Commission at the address indicated above within ten days after service of the Initial Order for transmittal to the State Board.

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of March, 2015, a true and correct copy of the above and foregoing was filed with the Secretary for the Kansas State Board of Education and one (1) copy was mailed by certified mail, return receipt requested, to:

Amber Chambers
611 4th Street
Oswego, Kansas 67356



Theresa Coté
Secretary, Professional Practices Commission

**BEFORE THE KANSAS STATE BOARD OF EDUCATION
PROFESSIONAL PRACTICES COMMISSION**

In the Matter of Application for
Teaching License Submitted by
Amber R. Chambers

14-PPC-45

APPENDIX I

**BEFORE THE KANSAS STATE BOARD OF EDUCATION
PROFESSIONAL PRACTICES COMMISSION**

In the Matter of Application for
Teaching License Submitted by
Amber R. Chambers

14-PPC-45

COMPLAINT

COMES NOW on this 5th day of December, 2014, Scott Myers, Director of Teacher Licensure and Accreditation, Kansas State Department of Education, 900 SW Jackson St., Topeka, Kansas 66612, and alleges the following:

1. Under Kansas law, teaching and school administration to be professions in Kansas with all the similar rights, responsibilities and privileges accorded other legally recognized professions. An educator is in a position of public trust.
2. It is within the authority of the Kansas State Board of Education to adopt rules and regulations providing for the issuance, renewal, reinstatement and revocation of a license to teach.
3. A license may be denied by the Kansas State Board of Education for misconduct or other just cause. K.A.R. 91-22-1a.
4. By order of the Kansas State Board of Education, the Professional Practices Commission shall investigate and conduct hearings pertaining to allegations of misconduct.
5. Amber R. Chambers applied for an Emergency Substitute License for the 2013-2014 school year in November 2013.
6. In her application, Ms. Chambers disclosed she had applied for and been denied a Kansas nursing license in September 2013. (Exhibit 1). She did not, however, provide the Kansas State Board of Nursing's Petition, which provides the factual basis for its denial of her application.
7. On April 12, 2013, the Kansas State Board of Nursing filed a Petition alleging Ms. Chambers had violated the Kansas Nurse Practice Act, K.S.A. 65-1120. (Exhibit 2). Therein, the Kansas State Board of nursing alleged:
 - a. Ms. Chambers had been arrested and charged with driving with her license cancelled/suspended/revoked in Craig County, Oklahoma;
 - b. In the District Court of Tulsa County, Oklahoma, she entered a plea to obtaining merchandise by false pretense on July 23, 2001;
 - c. In the District Court of Ottawa County, Oklahoma, she entered a plea to the charge

of aggravated driving a motor vehicle under the influence, open container and failure to carry insurance on May 2, 2010;

- d. In the District Court of Mayes County, Oklahoma, Ms. Chambers pled guilty to a drunk in a public place on January 11, 2010;
 - e. Ms. Chambers' Oklahoma driver's license was revoked on March 8, 2010, for a chemical test failure;
 - f. Ms. Chambers failed to complete a recovery program;
 - g. Ms. Chambers was referred to KNAP for a chemical dependency evaluation on January 14, 2013;
 - h. On March 21, 2013, the KNAP case was closed because Ms. Chambers informed KNAP she no longer wanted to apply for a nursing license in Kansas and would not participate in the KNAP program; and
 - i. Ms. Chambers' Oklahoma nursing license had lapsed.
8. A hearing was scheduled regarding Ms. Chambers' application for a Kansas nursing license, and, Ms. Chambers did not appear. She claims she requested a continuance. However, a Proposed Default Order to Deny Application for License was filed on October 2, 2013. (Exhibit 2).
9. On October 19, 2014, Ms. Chambers was arrested for driving under the influence in Cherokee County, Kansas.
10. On November 15, 2014, Ms. Chambers was arrested in Oswego, Kansas for misdemeanor battery in violation of K.S.A. 21-5413; felony abuse of a child in violation of K.S.A. 21-5602; and felony aggravated endangering a child (under the age of 18) in violation of K.S.A. 21-5601. The victim was a four-year-old child.
11. Ms. Chambers' conduct is inconsistent with the commonly-held perceptions and expectations of a member of the teaching profession. Such conduct violates the public trust and confidence placed in members of the profession. Furthermore, her conduct demonstrates a lack of fitness to perform the duties and responsibilities of a member of the teaching and school administration professions.
12. Ms. Chambers' misconduct is grounds for denial of her application for a license pursuant to K.A.R. 91-22-1a.
13. It is requested that Ms. Chambers' application be denied.

NOTICE

Pursuant to K.A.R. 91-22-1a(h) and K.S.A. 77-512, notice is hereby given of this Complaint and request for denial of applicant's application for a professional teaching license.

RIGHT TO A HEARING

Applicant has a right to request a hearing on the above issues and request for denial in accordance with the provisions of the Kansas Administrative Procedures Act. To obtain a hearing, a written request for a hearing must be filed with the Secretary of the Professional Practices Commission within fifteen [15] days of the date of service of this notice at the following address:

Theresa Coté
Secretary, Professional Practices Commission
Kansas State Department of Education
900 SW Jackson St.
Topeka, Kansas 66612-1182

Applicant has a right to file a written answer to this complaint. Applicant has twenty [20] days from the date of service of this notice. If no answer is filed within 20 days, Applicant will be deemed to have admitted the allegations contained in the complaint and acquiesced in the proposed action. An Initial Order will be entered recommending the revocation of your teaching license for the reasons stated in the Complaint and that notice of the revocation will be provided to all education agencies in the State of Kansas and to the agency responsible for issuing educator licenses/certificates in each of the other states.

Any answer shall type written or legibly printed, and any documents you intend to use in your defense must be attached. The answer must be signed and contain a statement under oath or affirmation that the statements made in the Answer are true. The Answer must be notarized and filed with the Secretary of the Professional Practices Commission by certified mail, return receipt requested, or by personal delivery to the address listed above.




Scott Myers
Director, Teacher Education and Licensure

VERIFICATION

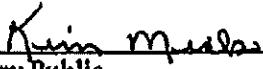
STATE OF KANSAS)
) SS:
COUNTY OF SHAWEE)

Scott Myers, of lawful age, being first duly sworn, on oath deposes and states: He is the Complainant in the above-captioned action; he has read the above and foregoing Complaint knows and understands the contents thereof, and the statements and allegations contained therein are true and correct, according to his knowledge, information, and belief.



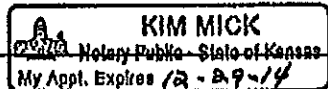
Scott Myers
Director, Teacher Education and Licensure

SUBSCRIBED AND SWORN TO before me, the undersigned authority, on this 5th day of December, 2014.



Notary Public

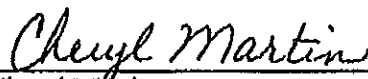
My appointment expires:


KIM MICK
Notary Public - State of Kansas
My Appt. Expires 12-29-14

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of December, 2014, a true and correct copy of the above and foregoing Complaint/Notice of hearing was filed with the Secretary for the Professional Practices Commission and one (1) copy was mailed by certified mail, return receipt requested, to:

Amber Chambers
611 4th Street
Oswego, Kansas 67356



Cheryl Martin
Teacher Education and Licensure

Question 1
8. G:

Kansas State Department of Education
120 SE 10th Avenue
Topeka, Kansas 66612

Kansas Department of Education Members,

As a resident of Kansas I applied to endorse my Oklahoma nursing license, where I am from, into Kansas Oct. 2012 so that I could work where I live. I was denied endorsement Sept. 2013 as a result of refusing to sign a contract saying I had failed a chemical dependency evaluation.

Although I had submitted ample documentation supporting that I had voluntarily attended a faith based recovery program and maintained sobriety since January 2010, I was required to submit to a chemical dependency evaluation due to a past DUI in 2009. I was told in writing I would be required to sign a yearlong contract with a monitoring program if I showed positive for impairment. I passed the evaluation but still received a contract in the mail stating that they received the results of my evaluation and were requiring me to sign a contract that included a long list of requirements and fees. I contacted them and disputed the contract, protesting that I was told I wouldn't have to sign it, that I had a copy of my evaluation and "no services were recommended".

I received a notice that because I refused to sign the contract a hearing was being held September 24th 2013 to review my application request. In fear of being railroaded I requested a continuance while I sought legal counsel. I was not informed of the status of my continuance request. Instead, I received a document that my application was denied for failure to appear at my hearing September 30th 2013. I am currently discussing the appropriate avenue to resolve this situation. Thank you for your understanding concerning this matter.

Warm Wishes,
Amber Chambers
Amber Chambers



Supporting doc

138 No 157
SLS

BEFORE THE KANSAS STATE BOARD OF NURSING
Landon State Office Building, 900 S.W. Jackson #1051
Topeka, Kansas 66612-1230

FILED OAH
29 AUG '18 AM 8:28

IN THE MATTER OF AMBER RENEE CHAMBERS

License No APPLICANT FOR ENDORSEMENT

Case No. 12-1702-0

AMENDED NOTICE OF PRE-HEARING CONFERENCE

Please find enclosed a pleading filed with the Board regarding your license or application for a license. The Board has the authority under the Nurse Practice Act, K.S.A. 65-1113 *et seq.*, to convene these proceedings which are conducted in accordance with the Administrative Procedure Act, K.S.A. 77-601 *et seq.*

A pre-hearing has been set for September 24th, 2013, at 9:00 a.m., or as soon thereafter as time permits, before Sandra L. Sharon, an impartial hearing officer, in Room 1051, Landon State Office Building, 900 S.W. Jackson, Topeka, Kansas. You may appear in person or you may retain an attorney to represent you. This pre-hearing may be held by telephone if you make prior arrangements with the disciplinary counsel.

The purpose of the pre-hearing is to address settlement possibilities, subpoenas, discovery, and other matters necessary on the pleading filed. The proceeding, without further notice, may be converted into a conference hearing or a summary proceeding for disposition. If you fail to attend or participate in a conference, hearing, or other stage of an adjudicative proceeding, you may be held to be in default and a proposed default order may be issued granting petitioner's request. If you need to request a continuance, you must do so in writing and prior to the hearing date.

You may file a letter or pleading with the Board at the address listed in the caption above. The Board fax number is 785-296-3929. Disciplinary Counsel for the Board can be reached at 785-296-4325. A message for Sandra L. Sharon may be left at 785-296-2433.



Sandra L. Sharon
Administrative Law Judge/Presiding Officer
Office of Administrative Hearings
1020 S Kansas Ave.
Topeka, KS 66612-1327

Supporting docs

BEFORE THE KANSAS STATE BOARD OF NURSING
Landon State Office Building, 800 S.W. Jackson #1051
Topeka, Kansas 66612-1290

IN THE MATTER OF AMBER RENEE CHAMBERS

License No APPLICANT FOR ENDORSEMENT

Case No. 12-1702-0

FILED

OCT 02 2013

KSBN

FILED OAH

27 SEP '13 @ 10:20

PROPOSED DEFAULT ORDER TO DENY APPLICATION FOR LICENSE

NOW ON THIS 30th day of September, 2013, petitioner, the Kansas State Board of Nursing, appears by disciplinary counsel, Michael R. Fitzgibbons, Assistant Attorney General, for a Hearing on the Petition. Respondent does not appear.

Wherefore, the Presiding Officer finds as follows:

1. Respondent is an applicant to licensed to practice nursing in Kansas. The Kansas State Board of Nursing has jurisdiction over the Respondent and the subject matter of this action.
2. Respondent was sent a copy of the petition and notice of this hearing to respondent's last known address and service is proper. Respondent does not appear.
3. Petitioner moves for issuance of a proposed default order denying respondent's license. The petitioner's request is granted by default pursuant to K.S.A. 77-520.
4. The petition is hereby granted and incorporated into this order as if set forth herein. Respondent violated the Nurse Practice Act as alleged in the petition.
5. Per Petitioner's request, Respondent's endorsement application for license to practice nursing is denied. Respondent may not practice nursing in Kansas.
6. Costs of the action of \$70 are assessed to respondent to be paid to the board by cash or money order within 30 days of the effective date of this order.
7. This Proposed Default Order shall become effective seven days after service or ten days after mailing of this order unless the Respondent files a written motion with the Board stating why the Proposed Default Order should be vacated and the order is then vacated.

BEFORE THE KANSAS STATE BOARD OF NURSING
Landon State Office Building, 900 S.W. Jackson #1051
Topeka, Kansas 66612-1230

IN THE MATTER OF AMBER RENEE CHAMBERS

License No APPLICANT FOR ENDORSEMENT

Case No. 12-1702-0

FILED

OCT 02 2013

KSBN

FILED OAH

27 SEP '13 AMB:20

PROPOSED DEFAULT ORDER TO DENY APPLICATION FOR LICENSE

NOW ON THIS 30th day of September, 2013, petitioner, the Kansas State Board of Nursing, appears by disciplinary counsel, Michael R. Fitzgibbons, Assistant Attorney General, for a Hearing on the Petition. Respondent does not appear.

Wherefore, the Presiding Officer finds as follows:

1. Respondent is an applicant to licensed to practice nursing in Kansas. The Kansas State Board of Nursing has jurisdiction over the Respondent and the subject matter of this action.
2. Respondent was sent a copy of the petition and notice of this hearing to respondent's last known address and service is proper. Respondent does not appear.
3. Petitioner moves for issuance of a proposed default order denying respondent's license. The petitioner's request is granted by default pursuant to K.S.A. 77-520.
4. The petition is hereby granted and incorporated into this order as if set forth herein. Respondent violated the Nurse Practice Act as alleged in the petition.
5. Per Petitioner's request, Respondent's endorsement application for license to practice nursing is denied. Respondent may not practice nursing in Kansas.
6. Costs of the action of \$70 are assessed to respondent to be paid to the board by cash or money order within 30 days of the effective date of this order.
7. This Proposed Default Order shall become effective seven days after service or ten days after mailing of this order unless the Respondent files a written motion with the Board stating why the Proposed Default Order should be vacated and the order is then vacated.



8 If this Proposed Default Order becomes effective, the Respondent's request for administrative hearing is dismissed pursuant to K.S.A. 77-520(d).

9. Disciplinary counsel shall mail a copy of this proposed default order to respondent's last known address.

IT IS SO ORDERED.

Sandra Sharon, Presiding Officer
Office of Administrative Hearings
1020 S Kansas Ave.
Topeka, KS 66612-1327

NOTICE

Pursuant to K.S.A. 77-527, either party may request a review of this order by filing a petition for review with the Kansas State Board of Nursing. The petition for review shall state its basis. A petition for review must be filed within 7 days from the date this order becomes effective. Failure to timely request a review by the Kansas State Board of Nursing may preclude further judicial review. The petition for review shall be mailed or personally delivered to: State Board of Nursing - Legal Division, Landon State Office Building, 900 SW Jackson, Ste 1051, Topeka, KS 66612-1230.

Pursuant to K.S.A. 77-530, if neither party requests a review by the Kansas State Board of Nursing, then this initial order becomes final and binding on both parties on the 30th day following its service.

Pursuant to K.S.A. 77-531, if the initial order is served by mail, three days are added to the time limits set out above.

Michael R. Fitzgibbons, #12287
Disciplinary Counsel
Kansas State Board of Nursing
900 S.W. Jackson, Suite #1051
Topeka, KS 66612-1230
786-298-4325

CERTIFICATE OF SERVICE

I certify that on the 2nd day of October, 2013, the foregoing copy of the PROPOSED DEFAULT ORDER TO DENYING LICENSE was served by depositing the same in the United States Mail, first-class postage prepaid, addressed to the following:
Amber A. Chambers
611 4th Street
Osawego, Kansas 67356

Michael R. Fitzgibbons, #12287
Assistant Attorney General

FILED # 1094
APR 12 2013
KSBN

BEFORE THE KANSAS STATE BOARD OF NURSING
Landon State Office Building, 900 S.W. Jackson #1051
Topeka, Kansas 66612-1230

IN THE MATTER OF AMBER RENEE CHAMBERS

License No APPLICANT FOR ENDORSEMENT

Case No. 12-1702-0

PETITION

COMES NOW the petitioner, the Kansas State Board of Nursing, by and through Assistant Attorney General assigned to the Board, Michael R. Fitzgibbons, and for its cause of action states that:

1. Respondent, Amber Renee Chambers, is an applicant to practice nursing in Kansas. The Board has jurisdiction over the respondent and the subject matter of this action.
2. Respondent's address of record is 611 4th Street Oswego, Kansas 67366.
3. After an investigation, the Board's investigative committee found reasonable grounds to believe that the respondent violated the Kansas Nurse Practice Act, K.S.A. 65-1120, and referred this matter for further proceedings.
4. The Kansas State Board of Nursing has the authority under K.S.A. 74-1106 et seq. to examine, license and renew license for duly qualified applicants and may limit, deny, suspend or revoke a license or authorization to practice nursing, may issue a public or private censure and levy administrative fines consistent with K.S.A. 74-1110, if a violation of K.S.A. 65-1120(a) is established.

FACTS COMMON TO ALL COUNTS

5. The facts below are common to all counts:
 - (a) As a result of applicant's background check, it indicated that you were arrested and charged with driving with license cancelled/suspended/revoked in Craig County Oklahoma.

- (b) In the District Court of Tulea County, Oklahoma applicant entered a plea to obtaining merchandise by false pretense on the 23rd of July, 2001.
- (c) In the District Court of Ottawa County, Oklahoma applicant entered a plea to the charge of aggravated driving a motor vehicle under the influence, open container and failure to carry insurance on the 2nd day of May, 2010.
- (d) In the District Court of Mayes County, Oklahoma, applicant pled guilty to drunk in a public place on the 11th day of January, 2010.
- (e) Oklahoma Driver's License was revoked on the 8th day of March, 2010 for chemical test failure.
- (f) Applicant failed to complete recovery program.
- (g) Applicant submitted an Endorsement Application on the 24th day of October, 2012.
- (h) Applicant was referred to KNAP for chemical dependency evaluation on the 14th day of January, 2013.
- (i) On the 21st day of March, 2013, the KNAP case was closed as applicant informed KNAP that she no longer wanted to apply for a Nursing License in Kansas and would not participate in the KNAP program.
- (j) Applicant's Oklahoma nursing license has lapsed.

VIOLATIONS

6. Respondent has violated the Kansas Nurse Practice Act as follows:

Count 1: K.S.A. 65-1120(a)(7), willfully and repeatedly violation provisions of the Kansas Nurse Practice Act by failing to complete the requirements of Impaired provider program KAR 60-8-110(a).

Count 2: K.S.A. 65-1120(a)(4) unable to practice with skill and safety due to current abuse of drugs or alcohol.

WHEREFORE, petitioner requests a finding that the respondent has violated the Nurse Practice Act, that respondent's request for a license to practice nursing in Kansas be denied, and that costs of this action be assessed to the respondent in the amount of \$70.00.

Respectfully submitted,

Derek Schmidt
Kansas Attorney General

By:

Michael R. Fitzgerald
Assistant Attorney General
Kansas State Board of Nursing
Landon State Office Building
900 SW Jackson #1061
Topeka, KS 66612

14-PPC-45

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <i>X [Signature]</i> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>
<p>1. Article Addressed to:</p> <p>Amber Renee Chambers 611 4th St. Oswego, KS 67356</p>	<p>B. Received by (Printed Name) <i>Edwin S. Howell</i> O. Date of Delivery <i>12/8/04</i></p>
<p>2. Article Number <i>(transfer from service label)</i></p>	<p>D. Is delivery address different from return? <input checked="" type="checkbox"/> Yes If YES, enter delivery address below <input type="checkbox"/> No</p> <p><i>915 Walnut Chetopa KS 67336</i></p>
<p>3. Article Number <i>(transfer from service label)</i></p>	<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> O.D.</p>
<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>7002 2430 0006 3684 5208</p>	<p>PS Form 3811, February 2004 Domestic Return Receipt 102599-02-11-1840</p>

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information, visit our website at www.usps.com

OFFICIAL USE

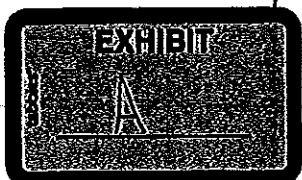
Postage \$
 Certified Fee \$
 Return Receipt Fee (Endorsement Required) \$
 Restricted Delivery Fee (Endorsement Required) \$
 Total Postage & Fees \$

POST TO
 AMBER RENE CHAMBERS
 or PO Box No.
 OSWEGO, KS 67356

Amber Renee Chambers
 611 4th St.
 Oswego, KS 67356

POSTMARK
 DEC - 8 2004
 TOPEKA KS 66603

PS Form 3811, June 2003 Use Only on Certified Mail



UNIFORM NOTICE TO APPEAR AND COMPLAINT

Case No. 14TR 925

Receipt No. _____

\$_____ of _____

Bond Amount: \$ _____

State of Kansas
County of CHEROKEE City of COLUMBUS

In the District Court of CHEROKEE COUNTY, Kansas
the undersigned, being duly sworn, upon their oath, deposes and says
on the 11th day of October, 20 14 at 0244 hrs.

C h a m b e r s

Amber (First) R (Initial)

Street Address: Cell 4th St

City: Owango State: KS Zip Code: 67326

Birth Date: 05/02/83 Race: W Sex: F Ht: 504 Wt: 134

DL Type: C DL State: KS No: K03304206 CDL

Del Upon: E 12th St + East Avenue of Border Sp, Kansas

Identifiy Operator a Yr: 2008 Make: Mazda Type: PC Continuous

License Plate State: KS License Plate No: 226 C H M License Plate Year: 14

And did they and there commit the following violation. M.C. No.:

Spurring: (checked by) <input checked="" type="checkbox"/> Radar <input type="checkbox"/> Stopwatch <input type="checkbox"/> Pace		Har. Mar? <input type="checkbox"/>
Alleged Speed: _____ mph Legal Speed: _____ mph		Accident? <input type="checkbox"/>
<input type="checkbox"/> Fail to Yield	<input type="checkbox"/> Disobey Traffic Sign/Signal	<input checked="" type="checkbox"/> Left of Center
<input type="checkbox"/> Seat Belt	<input checked="" type="checkbox"/> Registration Expired	<input type="checkbox"/> Civil Restraint
<input type="checkbox"/> Equipment	<input type="checkbox"/> Wrong Plate on Vehicle	<input type="checkbox"/> Log Book
<input type="checkbox"/> Driver's License	<input checked="" type="checkbox"/> Proof of Current Insurance	

Stat. No.	Accident	Common Vehicle	Hazardous Material	Construction Zone
1 Stat. No. <u>8</u> <input type="checkbox"/> Infracton <input checked="" type="checkbox"/> Misdemeanor				
Soc. No. <u>1567</u> Description: <u>Driving under the influence of alcohol, drugs, or both</u>				
2 Stat. No. <u>8</u> <input type="checkbox"/> Infracton <input checked="" type="checkbox"/> Misdemeanor				
Soc. No. <u>42</u> Description: <u>expired plates</u>				

Stat. No.	Accident	Common Vehicle	Hazardous Material	Construction Zone
3 Stat. No. <u>40</u> <input type="checkbox"/> Infracton <input checked="" type="checkbox"/> Misdemeanor				
Soc. No. <u>3104</u> Description: <u>Motor Vehicle Liability insurance coverage required</u>				

Officer's Signature: X Paula J. Jones No. 14 cc ck

Appear before District Court at CHEROKEE COUNTY

on 15th day of December, at 11 900 a.m.

promise to appear by said court or said time and place above for said purposes

Signature: X Janet

Bond Provider: Cash D.I. \$ _____ Amount

I, the undersigned, solemnly swear that the information herein is true and correct.

COMPLAINT

Name: Chambers Amber

