

**BEFORE THE MINNESOTA
EMERGENCY MEDICAL SERVICES REGULATORY BOARD**

In the Matter of the Certificate
of Lori A. Dodds, EMT
Certificate Number: 956651

**STIPULATION AND
CONSENT ORDER**

STIPULATION

IT IS HEREBY STIPULATED AND AGREED by and between Lori A. Dodds, Emergency Medical Technician (“EMT”) (“Respondent”), and the Complaint Review Panel (“Review Panel”) of the Emergency Medical Services Regulatory Board (“Board”) as follows:

JURISDICTION

1. During all times herein, Respondent has been and now is subject to the jurisdiction of the Board from which she holds a certificate as an EMT in the State of Minnesota.
2. Respondent holds a certificate from the Board to practice emergency medical services in the State of Minnesota and is subject to the jurisdiction of the Board with respect to the matters referred to in this Stipulation and Consent Order.

BACKGROUND

3. Respondent has been advised by Board representatives that she may choose to be represented by legal counsel in this matter. Respondent is represented by Timothy H. Baland, Baland Law Office, P.L.L.C., 2140 Fourth Avenue North, Anoka, Minnesota 55303, telephone (763) 450-9494. The Review Panel is represented by Gregory J. Schaefer, Assistant Attorney General, 1400 Bremer Tower, 445 Minnesota Street, St. Paul, Minnesota 55101-2131, telephone (651) 757-1366.

FACTS

4. For the purpose of this Stipulation, the parties may consider the following facts as true:

- a. The Board certified Respondent as an EMT on January 8, 2010.
- b. From June 2010 through June 2012, Respondent was hospitalized or treated in excess of 20 occasions for her mental health.
- c. Respondent has been diagnosed with various mental health issues and disorders.
- d. Respondent experienced serious mental health issues, abused prescription medications and over-the-counter drugs while on call, exhibited angry outbursts, made threats to crash her car, and exhibited suicidal ideations and behavior on numerous occasions. Respondent denies this conduct.

STATUTES

5. The Review Panel views Respondent's conduct as inappropriate in such a way as to require Board action under Minn. Stat. § 144E.28, subds. 4 and 5(a)(4), (5), and (8), and Respondent agrees that the conduct cited above constitutes a reasonable basis in law and fact to justify the disciplinary action under these statutes.

DISCIPLINARY ACTION

The parties agree the Board may take the following disciplinary action and require compliance with the following terms:

A. Voluntary Surrender

6. The Board accepts the **VOLUNTARY SURRENDER** of Respondent's EMT certificate. Respondent shall not engage in any act which constitutes the practice of emergency medical services and shall not imply by words or conduct that Respondent is authorized to do so.

7. Respondent shall surrender to the Board her EMT certificate. Respondent shall personally deliver or mail the certificate to the Minnesota Emergency Medical Services Regulatory Board, c/o Pamela Biladeau, Executive Director, 2829 University Avenue S.E., Suite 310, Minneapolis, Minnesota 55414-3222, within ten days of the date of this Order.

B. Reinstatement

8. Respondent may not petition for reinstatement of her EMT certificate until she is able to demonstrate by a preponderance of the evidence that she is capable of performing emergency medical services in a fit, competent, and ethical manner and with reasonable skill and safety. The burden of proof shall be upon Respondent to demonstrate by a preponderance of the evidence that she has been sober and free from mood-altering chemicals and that her mental health has been stable during the 12 months immediately preceding her petition. At the time of Respondent's petition, Respondent shall meet with the Review Panel to provide documentation of stable mental health and to discuss the issues raised by these complaints, as well as any complaints received subsequent to the surrender of her certificate. In petitioning for reinstatement of her certificate, Respondent shall comply with or provide the Board with, at a minimum, evidence of compliance with the provisions of this Order. Respondent must meet all requirements for certification in effect at the time of petition including successful completion of a Board-approved EMT practical skills examination. Before considering Respondent's petition, the Review Panel may request that Respondent complete evaluations or examinations as deemed

necessary by the Review Panel or submit various forms of documentation for the Review Panel's consideration. The Review Panel will make the final determination as to whether Respondent's petition should be denied or granted with or without conditions and/or limitations.

CONSEQUENCES FOR NONCOMPLIANCE

9. If Respondent engages in any act which constitutes practice of emergency medical services or implies by words, advertising, or any other conduct that Respondent is authorized to practice emergency medical services, the Board may in its discretion pursue an additional remedy, including bringing an action in district court for injunctive relief pursuant to Minnesota Statutes section 214.11.

ADDITIONAL INFORMATION

10. Licensee waives the contested case hearing and all other procedures before the Board to which Licensee may be entitled under the Minnesota and United States constitutions, statutes, or rules.

11. Licensee waives any claims against the Board, the Minnesota Attorney General, the State of Minnesota, and their agents, employees, and representatives related to the investigation of the conduct herein, or the negotiation or execution of this Stipulation and Consent Order, which may otherwise be available to Licensee.

12. This Stipulation and Consent Order, the files, records, and proceedings associated with this matter shall constitute the entire record and may be reviewed by the Board in its consideration of this matter.

13. Either party may seek enforcement of this Stipulation and Consent Order in any appropriate civil court.

14. Licensee has read, understands, and agrees to this Stipulation and Consent Order and has voluntarily signed the Stipulation and Consent Order. Licensee is aware this Stipulation and Consent Order must be approved by the Board before it goes into effect. The Board may either approve the Stipulation and Consent Order as proposed, approve it subject to specified change, or reject it. If the changes are acceptable to Licensee, the Stipulation and Consent Order will take effect and the order as modified will be issued. If the changes are unacceptable to Licensee or the Board rejects the Stipulation and Consent Order, it will be of no effect except as specified in the following paragraph.

15. Licensee agrees that if the Board rejects this Stipulation and Consent Order or a lesser remedy than indicated in this settlement, and this case comes again before the Board, Licensee will assert no claim that the Board was prejudiced by its review and discussion of this Stipulation and Consent Order or of any records relating to it.

16. This Stipulation and Consent Order shall not limit the Board's authority to proceed against Licensee by initiating a contested case hearing or by other appropriate means on the basis of any act, conduct, or admission of Licensee which constitutes grounds for disciplinary action and which is not directly related to the specific facts and circumstances set forth in this document.

ADDITIONAL TERMS

17. This Stipulation and Consent Order ("Stipulation"), related investigative reports, and other documents shall constitute the entire record of the proceeding upon which this order is based. The investigative reports, other documents, or summaries thereof may be filed with the Board with the Stipulation. Any reports or other material related to this matter which may be

received after the date the Board approves the Stipulation shall become a part of the record and may be considered by the Board in future aspects of this proceeding.

18. Respondent shall meet all recertification requirements in effect at the time of her petition, including but not limited to completing the appropriate application, paying the requisite fees, and completing any necessary continuing education requirements.

19. Respondent's violation of this Order shall constitute violation of a Board order for purposes of Minnesota Statutes section 144E.28, subdivision 5(a)(1), and provide grounds for further disciplinary action.

20. In the event the Board in its discretion does not approve this settlement, this Stipulation is withdrawn and shall be of no evidentiary value and shall not be relied upon or introduced in any disciplinary action by either party hereto, except that Respondent agrees that if the Board rejects this Stipulation and this case proceeds to hearing, Respondent will assert no claim that the Board was prejudiced by its review and discussion of this Stipulation or of any records relating hereto.

21. Respondent waives any further hearings on this matter before the Board to which Respondent may be entitled by Minnesota or United States Constitutions, statutes, or rules and agrees that the Order to be entered pursuant to the Stipulation shall be the final Order herein.

22. This Stipulation and Consent Order shall not limit the Board's authority to proceed against Respondent by initiating a contested case hearing or by other appropriate means on the basis of any act, conduct, or admission of Respondent which constitutes grounds for disciplinary action and which is not directly related to the specific facts and circumstances set forth in this document.

DATA PRACTICES NOTICE

23. This Stipulation constitutes disciplinary action by the Board and is classified as public data pursuant to Minnesota Statutes section 13.41, subdivision 5. Data regarding this action will be provided to data banks as required by federal law or consistent with Board policy. While this Stipulation is in effect, information obtained by the Board pursuant to this Stipulation is considered active investigative data on a licensed health professional and, as such, is classified as confidential data pursuant to Minnesota Statutes section 13.41, subdivision 4.

24. Respondent hereby acknowledges that she has read and understands this Stipulation and has voluntarily entered into it. This Stipulation contains the entire agreement between the parties, there being no other agreement of any kind, verbal or otherwise, which varies the terms of this Stipulation.

CONSENT:

EMERGENCY MEDICAL SERVICES
REGULATORY BOARD
COMPLAINT REVIEW PANEL



LORI A. DODDS, EMT
Respondent

Dated: April 21, 2014



MATTHEW SIMPSON
Board Member

Dated: 5-7-2014, 2014

ORDER

Upon consideration of this Stipulation and Consent Order and all the files, records, and proceedings herein, the Board accepts the **VOLUNTARY SURRENDER** of Respondent's EMT certificate and adopts all of the terms described above on this 19 day of May, 2014.

MINNESOTA EMERGENCY MEDICAL
SERVICES REGULATORY BOARD

By: Pamela Biladeau
PAMELA BILADEAU
Executive Director