

**BEFORE THE MINNESOTA
BOARD OF PSYCHOLOGY**

In the Matter of the License of
Kathryne Sanders, M.Eq., L.P.
License Number: LP1847

**STIPULATION AND
CONSENT ORDER**

IT IS HEREBY STIPULATED AND AGREED by Kathryne Sanders, M.Eq., L.P. ("Licensee"), and the Minnesota Board of Psychology ("Board") as follows:

1. During all times herein, Licensee has been and now is subject to the jurisdiction of the Board from which she holds a license to practice psychology in the State of Minnesota.

FACTS

2. For the purpose of this licensure proceeding only, and having no force and effect in any extraneous civil or criminal proceeding, the Board may consider the following statements as facts:

a. Licensee was licensed as a licensed psychologist in Minnesota on November 17, 1978.

b. At all times material hereto, Licensee maintained a practice as a licensed psychologist in Minnesota. During all times herein, Licensee has been and now is subject to the jurisdiction of the Board from which she holds a license to practice psychology in the State of Minnesota.

c. In June 1998, Licensee began a therapeutic relationship with client #1. Client #1 was seen by Licensee from June 22, 1998, until February 2010. In connection with these psychological services, Licensee engaged in unprofessional conduct by failing to maintain appropriate professional boundaries as follows:

1) Early on in the therapeutic relationship, Licensee and client #1 met in sessions once or twice a week. By October 1998, Licensee's sessions with client #1 became more frequent, and by 2002 or 2003, their sessions had increased to five days per week, including telephone consultation appointments on Sundays. During the weekday appointments, Licensee's sessions with client #1 lasted from approximately 8:00 a.m. to 9:40 a.m.

2) The relationship between Licensee and client #1 eventually exceeded professional boundaries. Examples of the dual relationship include the following:

a) February 15, 2006, calendar entry: "3:00 [Licensee] to visit client #1's [boyfriend] 7:00 Wolves - Seattle [Licensee's husband & son]." Licensee billed client #1 \$1,716.00 for 660 minutes for non-basic service (99050). Licensee also charged client #1 \$260.00 for 120 minutes for late cancellation (90899).

b) February 22, 2006, calendar entry: "Hospice meeting." Licensee billed client #1 \$260.00 for 120 minutes for other procedure (90899), \$468.00 for 180 minutes for non-basic service (99050), and \$234.00 for 90 minutes for phone call to client.

c) February 26, 2006, calendar entry: "[Client #1's boyfriend] passed away." Licensee charged client #1 \$2,028.00 for 780 minutes for non-basic services (99050).

d) February 28, 2006, calendar entry: Client #1's boyfriend's funeral. Licensee charged client #1 \$260.00 for 120 minutes for other procedure (90899) and \$780.00 for 300 minutes for non-basic service (99050). Licensee wrote the eulogy, and Licensee's husband was a pallbearer.

e) March 4, 2006, calendar entry: "[Licensee and Licensee's husband's] anniversary."

f) March 28, 2006, calendar entries: "10:15 [Licensee] Neiman's shoe dept." "1:00 [client #1] Court-hearing [Licensee]." Licensee charged client #1 \$936.00 for 360 minutes for non-basic service (99050) and \$260.00 for 100 minutes for late cancellation (90841).

g) August 4, 2006, calendar entry: "10:30 [(male name) & Licensee] @ Lakewood marker and monument." Licensee charged client #1 \$260.00 for 120 minutes for other procedure (90899) and \$546.00 for 210 minutes for non-basic service (99050).

h) May 12, 2007, calendar entry: "[Licensee's son's birthday]."

i) October 13, 2007, calendar entry: "[Licensee's 59th birthday]." "[Licensee's] birthday gift."

j) November 16, 2007, calendar entry: "Wolves - Washington [Licensee's husband & son]."

k) Licensee assisted client #1 with finances, organized her personal documents, organized her closets, attended meetings in which client #1's attorneys, bankers, and physicians were involved, and billed client #1 for services while she was hospitalized. During her interview with an investigator from the Minnesota Attorney General's Office, Licensee stated she provided "supportive" services to client #1 during the client's hospitalization and that she accompanied client #1 to doctor appointments "because her anxiety level was so high." Licensee also stated that she attended meetings with client #1's attorney, that Licensee was not a defendant and had never been deposed but provided "some personal support" to client #1. Licensee admitted going to client #1's home and providing services, such as "going

over records, helping her categorize her expenditures, entering data into equipment,” and helping client #1 organize some of her personal belongings.

3) Licensee billed client #1 for personal outings and assistance and included these services in client #1’s therapy. For example:

a) August 7, 2006, calendar entry: “[redacted] depo FLA.” Licensee billed client #1 \$312.00 for 120 minutes for medical testimony (99075). According to the *Current Procedural Terminology* (CPT) manual, this code is valid for deposition testimony, medical testimony, full court testimony, or deposition transcription review. Licensee neither testified nor reviewed a deposition transcript on this date.

b) December 21, 2006, calendar entry: “[Client #1] had surgery and was overnight at the Mayo Clinic.” Licensee billed client #1 \$1092.00 for 420 minutes for non-basic service (99050) and \$260.00 for 120 minutes for other procedure (90899).

c) December 7, 2007, calendar entry: “9:15 [client #1, Licensee] and Dr. [redacted] re: cortisone shot.” Licensee billed client #1 \$546.00 for 210 minutes for other procedure (90899) and \$260.00 for 100 minutes for other procedure (90899).

d) January 20 and 21, 2009, calendar entry: “[Client #1] at Mayo Clinic for carpal tunnel surgery.” Licensee billed client #1 \$280.00 for 100 minutes on both days for a total of \$560.00 for other procedure (90899).

e) March 2, 2009, calendar entry: “1:30 meeting - [redacted name] office trustee.” Licensee billed client #1 \$420.00 for 300 minutes for non-basic services (99050).

f) September 22 and September 25, 2009, calendar entries: "9:00 [redacted - Licensee] house" to fix Quicken and closets." Licensee billed client #1 \$1,750.00 for 625 minutes for non-basic service (99050). On September 25, 2009, Licensee was also at client #1's home for the same services and billed client #1 \$1,568.00 for 560 minutes for other procedure (90899).

g) January 16, 2010, calendar entry: "9:00 [redacted - Licensee] house." Licensee billed client #1 \$2,268.00 for non-basic service (99050).

h) February 8, 2010, calendar entry: "8:00 [redacted - Licensee] house." Licensee billed client #1 \$1078.00 for non-basic service (99050) and \$196.00 for reimbursement for phone consultation (99371). (As of 2008, this CPT code is no longer valid.)

4) On February 26, 2008, Licensee and her husband were named as beneficiaries in client #1's Last Will and Testament.

5) Client #1 provided the following gifts to Licensee, Licensee's husband, and Licensee's son:

1 White gold and diamond ring	1	Saeco coffeemaker
1 Platinum and diamond ring	2	Large iron planters (outdoor)
1 Platinum, Tahitian cultured pearl and ruby ring	1	AMSEC safe
1 Platinum and diamond ring	1	Apple laptop
1 Oscar Hyman gold, diamond, and emerald ring	1	Louis Vuitton purse (black)
1 Pearl and diamond necklace	1	Pair Cole Haan leather gloves (black)
1 Diamond necklace	1	Scarf (green/feathery)
1 Men's Rolex Explorer watch	1	Scarf (gold and brown/stringy)
1 Gent's Rolex diamond dial watch	1	Ecoscarf (multi-colored/reds)
1 Men's Duby & Schaldenbrand watch	1	Pair Cole Haan - Nike Air Boots
1 Women's Franck Muller Geneve watch	1	Pair Cole Haan boots (brown/high heels)
1 John Hardy bracelet (silver?) woven pattern	1	Pair Cole Haan clogs (black)
1 Serenity Jewels necklace #1, silver	1	Pair Cole Haan peep-toe pumps (black/grey)

1 Serenity Jewels necklace #2, silver	1	Pair Stewart Weitzman boots (grey/low heels)
1 Serenity Jewels necklace #3, silver	1	Pair Pons Quintana boots (black)
1 Serenity Jewels bracelet, silver	1	Pair Cole Haan bow pumps (black)
1 Green jade necklace, green-striped pouch	1	Louis Vuitton wallet (black)
1 Green jade bracelet, green-striped pouch	1	Pair Chanel boots (black/spike heels)
1 Black jade necklace, orange-striped pouch	1	Pair Claudia Ciuti boots (black/spike heels)
1 Black jade bracelet, multi-color striped pouch	1	Apple iPod Touch
1 Elizabeth Locke broach	1	Gold, diamond, mother of pearl watch
1 Little Red Riot metal - eyewear	1	Designer luxury purse (returned)
1 Te-w.a.te - eyewear	1	Shrub pruning service
	1	\$5,000.00 check dated 11-06-2006, Check 8538
1 Fumunda - eyewear		Sold Items (reported by Licensee)
1 Dollz - eyewear	1	Gold, diamond, mother-of-pearl watch
1 Switchblade with case		
1 Guitar Hero World Tour Activision game		Additional Items (reported by client #1)
Pair Tod's sandals (red)	2+	Gas cards /Licensee's husband and son
Pair Henry boots (black/high heels)		Vikings football tickets
Pair Prada flip flops (black)	16	Timberwolves basketball tickets
Pair Prada sandals (black)		
1 Black leather 3-compartment shoulder bag	1	case red wine / Licensee's husband
	1	Pair Dr. Scholl's sandals (black/white design)
	1	Pair Miu Miu shoes
1 Louis Vuitton shoulder bag - blue print		
1 Blue Planet scarf		
1 Westwood Print - Plate 37 (butterflies?)		
1 Westwood Print - Plate 15 (moths?)		
1 Westwood Print - Plate 27 (butterfly?)		
1 Pair Gucci boots (black/spike heels)		

6) Client #1 received a number of thank-you cards from Licensee's husband and Licensee's son for gifts they received. Examples of messages conveyed in those cards include the following:

a) “[Client #1], Thanks so much for your extremely thoughtful gift. I hope you understand that it’s never a bother (much less a burden) to help you connect with [Licensee]. I’m very concerned about your well being, and I’m willing to contribute whatever small things I can to help. You deserve that and so much more. My very best. [Licensee’s husband].”

b) “[Client #1], Thanks so much for the tickets. Even though the Giants lost, [redacted] let us off easy. We had a great time! [Licensee’s husband]”

c) “[Client #1], thanks so much for the birthday flowers. I was bowled over. We all deeply appreciate your thoughtfulness, kindness and all you’ve had to go through to get where you are. Most of all, I hope you appreciate what a great person you are. [Licensee’s husband]”

d) “Dear [Client #1], Thank you very much for the iPod video, I love everything about it. The fact it is in color, the videos, the black outside, everything. I can’t thank you enough for this gift, but hopefully I can start with this. Thanks. [Licensee’s son]”

e) “Dear [Client #1], Thank you very much for the laptop. I can’t wait for the millions of possibilities I have now with this new computer. I really appreciate this and for this, I thank you. Hope you have a good summer! [Licensee’s son]”

f) “Dear [Client #1], Thank you so much for the presents you gave to me. I couldn’t have asked for anything better. The game was a blast and Saca was very fun to talk to. And the iPod has blown me away. Again, I can’t thank you enough and I hope this can be at least somewhat compare to what you gave me. Thanks. [Licensee’s son]”

7) The following are examples of cards and notes that were sent to client #1 by Licensee:

a) "Dear [Client #1], You will get through this. [Licensee's husband and son] and I are all thinking of you a lot. I love you. [Licensee]"

b) "Doing the right thing for [redacted] was a very painful thing for you. We admire your bravery and compassion. Our thoughts & prayers are with you. Love, [Licensee, Licensee's husband, and son]"

c) "Dear [Client #1] ...Happy Birthday I bless the day that you were born -- you could not be more dear to me! Love, [Licensee]"

d. Licensee failed to terminate the professional relationship according to professional standards.

e. Licensee failed to maintain accurate and complete client records for client #1, in violation of Minn. R. 7200.4700, subp. 1, as follows:

1) For the years 1998 to 2002, Licensee failed to maintain account summaries for amounts billed to client #1. Licensee did not submit any charges to insurance; all were paid out of pocket by client #1. On several occasions, client #1 signed blank checks payable to Licensee, and Licensee would fill in the amount. By 2004, most of the checks were signed by client #1 but filled out by Licensee. The following information was compiled only by records that Licensee had in her possession:

YEAR	INDIVIDUAL SESSIONS	GROUP SESSIONS	PHONE SESSIONS	NON-BASIC	LATE CANCEL
1998	4				
1999	3		5		
2000	54	8	22	1	17
2001	75	10	15		
2002	120	16	17		4

2) For the years 2003 through 2010, the following information was compiled based on Licensee's account summaries, her treatment records for client #1, and checks issued by client #1 to Licensee. The lack of records enclosed in parenthesis is determined by account summaries and/or client #1's personal checks and Licensee's treatment records for client #1. However, for the years 2006 and 2007, Licensee failed to maintain any treatment records for client #1.

YEAR	INDIVIDUAL SESSIONS	GROUP SESSIONS	PHONE SESSIONS	NON-BASIC	LATE CANCEL
	(NO RECORDS)	(NO RECORDS)	(NO RECORDS)	(NO RECORDS)	(NO RECORDS)
2003	156 (138)	34 (138)	66(20)	1 (0)	34 (25)
2004	181 (56)	31 (8)	71(20)	1 (0)	30 (9)
2005	218 (36)	33 (1)	67(5)	16 (0)	40 (1)
2006	240 (0)	39 (0)	90(0)	47 (0)	14 (0)
2007	237 (0)	37 (0)	102(0)	22 (0)	25 (0)
2008	238 (65)	33 (0)	63(2)	17 (6)	9 (2)
2009	228 (21)	N/A	47	20 (3)	9 (9)
2010	19	N/A	5	2	22

3) Licensee failed to document the following payments in client #1's account: January 11, 2010; \$1,736.00; check 5327; January 25, 2010; \$1,582.00; check 5339.

4) Licensee failed to document a treatment plan, goals, or revisions of these goals for client #1.

5) Licensee frequently used discontinued CPT billing codes. On several occasions, Licensee applied CPT Code 99371, which has been deleted and replaced since 2008. Examples include November 8 and November 15, 2009; December 6, 13, and 20, 2009; December 27, 2009; January 8, 2010; and February 8 and February 9, 2010.

6) Licensee sent client #1 a statement for the billing period of February 1-29, 2010, with a Post-it note dated "3/19" attached and the following handwritten

message: "Dear [Client #1], As you can see, you have a credit balance. Would you like to keep it on account, or get a refund? Whatever you prefer is fine -- just let me know. [Licensee]"

REGULATIONS

3. The Board views Licensee's practices as described in paragraph 2 above to be in violation of statutes and rules enforced by the Board. Licensee agrees that the conduct cited above constitutes the following violations and supports a reasonable basis in law and fact to justify the disciplinary action provided for in this Stipulation and Consent Order. The Facts herein establish that Licensee:

a. Engaged in unprofessional conduct or any other conduct which has the potential for causing harm to the public, including any departure from or failure to conform to the minimum standards of acceptable and prevailing practice, without actual injury having to be established, in violation of Minn. Stat. § 148.941, subd. 2(a)(3), and Minn. R. 7200.5700;

b. Provided psychological services to a client when the psychologist's objectivity or effectiveness was impaired, in violation of Minn. R. 7200.4810, subp. 1;

c. Provided psychological services to a client when the psychologist's objectivity or effectiveness was impaired by a dual relationship with a client, in violation of Minn. R. 7200.4810, subp. 2.A.;

d. Exploited the professional relationship with a client for the psychologist's emotional, financial, or personal advantage or benefit, in violation of Minn. R. 7200.4810, subp. 2.E.;

e. Failed to terminate services to a client and refer a client when the psychologist's objectivity or effectiveness became impaired during a professional relationship, in violation of Minn. R. 7200.4810, subp. 3;

f. Failed to coordinate services for a client with other mental health professionals, in violation of Minn. R. 7200.4900, subp. 9;

g. Directly or by implication misrepresented to a client and/or a third party the services provided to a client, in violation of Minn. R. 7200.5200, subp. 3; and

h. Violated a statute, rule, or order that the Board issued or is empowered to enforce, in violation of Minn. Stat. § 148.941, subd. 2(a)(1).

REMEDY

4. Upon this stipulation and without any further notice or proceedings, the Board hereby **SUSPENDS** Licensee's license indefinitely, effective immediately. During the period of suspension, Licensee shall not practice psychology in any manner, shall neither offer nor provide psychological services of any kind within Minnesota, and shall not use the designation "licensed psychologist," "LP," or any other designation that implies that Licensee is eligible to practice psychology in the State of Minnesota. Licensee shall be allowed to petition for reinstatement of her license after two (2) years from the date this Stipulation and Consent Order is adopted by the Board. At the time of her petition, the burden of proof shall be upon Licensee to demonstrate by a preponderance of the evidence that she is capable of returning to the practice of psychology in a fit, competent, and ethical manner. During the period of suspension and prior to petitioning for reinstatement, Licensee shall comply with the requirements set forth in paragraphs 4.a. through 4.d. below:

a. ***Professional Boundaries Course.*** Within 60 days of the date this Stipulation and Consent Order is adopted by the Board, Licensee shall arrange to enroll in an individualized professional boundaries training course. The Committee will provide Licensee with a list of such courses and instructors which have been approved for the purposes of

satisfying this requirement. If the Committee and Licensee concur that there is sufficient reason for Licensee not to enroll in any of the courses the Committee has listed, Licensee shall submit to the Committee for approval a syllabus that includes goals, objectives, assignments, projects, methods, and frequency of evaluation, etc., for a similar individualized professional boundaries training course. Licensee shall also submit the course instructor's curriculum vitae to the Committee for its approval of the instructor. The instructor shall be either a licensed psychologist or have a doctoral degree in psychology.

Licensee shall complete the professional boundaries course within one year of the date this Stipulation and Consent Order is adopted by the Board. All fees for the course shall be paid by Licensee. Successful completion of the boundaries course shall be determined by the Committee.

b. ***Report on Boundaries Course From Licensee.*** Within 30 days of completing the professional boundaries course referenced above, Licensee shall submit a report to the Committee which provides and/or addresses:

- 1) The dates Licensee began and completed the boundaries training course;
- 2) A brief statement of the topics covered in the professional boundaries training course;
- 3) A detailed discussion of what Licensee has learned from the boundaries training course, including Licensee's comprehension and knowledge of boundary issues, as well as various ethical issues encountered in practice, and how this course may affect her practice in the future;

4) A detailed discussion of the violations that occurred within the circumstances described in the Facts section of this Stipulation and Consent Order, including:

- a) How Licensee came to violate professional boundaries;
- b) The manner in which Licensee violated these boundaries;
- c) The specific harm to each individual that resulted and the potential harm to other individuals that could have resulted from Licensee's conduct; and
- d) How Licensee now believes the violations could have been averted;

5) A detailed discussion of the specific ways this course may affect Licensee's practice if she is reinstated;

6) Licensee's reasons for believing she is capable of conducting herself in a fit, competent, and ethical manner in the practice of psychology; and

7) Any other information Licensee believes would assist the Board in its ultimate review of this matter.

c. **Report on Boundaries Course From Instructor.** Within 60 days of completing the professional boundaries course referenced above, Licensee shall cause to be submitted to the Committee a report from the instructor of the professional boundaries course. This report shall address:

- 1) The extent of Licensee's participation in the course; and
- 2) The instructor's assessment of Licensee's knowledge obtained from the course and opinion as to Licensee's ethical fitness to engage in the practice of psychology.

d. **Civil Penalty.** Respondent shall pay a civil penalty in the amount of fifty thousand dollars (\$50,000.00). Pursuant to Minn. Stat. § 148.941, subd. 2(b)(7), the Board may

impose a civil penalty not exceeding \$7,500.00 for each separate violation of the Psychology Practice Act. The amount of the penalty herein was calculated so as to deprive Licensee of any economic advantage gained by reason of the violations charged and to discourage repeated violations. The civil penalty shall be paid by cashier's check or money order made payable to the Minnesota Board of Psychology and shall be delivered personally or by mail to the Minnesota Board of Psychology, c/o Angelina M. Barnes, Executive Director, 2829 University Avenue S.E., Suite 320, Minneapolis, Minnesota 55414, prior to petitioning for reinstatement.

5. ***Supervision of Licensee by Board-Approved Psychologist.*** If Licensee's petition for reinstatement is granted pursuant to paragraph 4, Licensee shall be granted a conditional license and shall practice psychology under the supervision of a supervising psychologist for a period of one (1) year. Licensee's supervisor must be approved in advance by the Committee from a list of at least three names Licensee has submitted to the Committee. Licensee shall cause each psychologist listed to submit a curriculum vitae to the Board for the Committee's review prior to its approval of a supervisor. The Committee reserves the right to reject all names submitted by Licensee. If the Committee rejects any names submitted, the Committee may require that Licensee submit additional names as described above, or the Committee may provide Licensee with the name of a supervisor. Licensee shall have no previous personal or professional relationship with the supervisor. Licensee shall not engage in the practice of psychology until a supervisor has been approved by the Committee and retained by Licensee. Licensee shall meet with the supervising psychologist no less than one hour per week for the one-year period. The purpose of the meetings is to address and review issues that shall be contained within the supervisor's reports as follows:

a. ***Supervisor's Reports.*** The supervising psychologist shall provide a report to the Committee every three months and at the time Licensee petitions to have the supervisory condition removed from her license. The first report is due three months from the date supervision begins, and all subsequent reports shall be submitted on the first day of the month in which they are due. Each report shall provide and/or address:

- 1) In the first report, evidence Licensee's supervisor has received and reviewed a copy of this Stipulation and Consent Order;
- 2) Dates on which supervision took place with Licensee;
- 3) The method by which supervision was conducted;
- 4) A statement that all cases have been reviewed, a description of any problems discovered in the review, and the resolution of the problems;
- 5) The supervisor's opinion as to Licensee's ability to provide competent services;
- 6) Any other information the supervisor believes would assist the Board in its ultimate review of this matter; and
- 7) At the time Licensee petitions for removal of the supervisory condition, the supervisor's report shall include an assessment of Licensee's ability to conduct herself in a fit, competent, and ethical manner in the practice of psychology as well as whether Licensee exhibits an acceptable comprehension and knowledge of ethical issues encountered in practice as well as the ability to apply this knowledge.

b. ***Petition for Removal of Supervisory Condition.*** At the time Licensee petitions for removal of the supervisory condition, the burden of proof shall be upon Licensee to

demonstrate by a preponderance of the evidence that she is capable of returning to the unsupervised practice of psychology in a fit, competent, and ethical manner.

6. If any due date required by this Stipulation and Consent Order is not met, the Committee may fine Licensee \$100.00 per violation. Licensee shall pay the fine and correct the violation within five days after service on Licensee of a demand for payment and correction. If Licensee fails to do so, the Committee may impose additional fines not to exceed \$500.00 per violation. The total of all fines may not exceed \$5,000.00. Licensee waives the right to seek review of the imposition of these fines under the Administrative Procedure Act, by *writ of certiorari* under Minn. Stat. § 480A.06, by application to the Board, or otherwise. Neither the imposition of fines nor correction of the violation will deprive the Board of the right to impose additional discipline based on the violation.

7. Licensee is responsible for all costs incurred as a result of compliance with this Stipulation and Consent Order.

8. No condition imposed as a remedy by this Stipulation and Consent Order, including conditions directly related to a restriction, shall be used as a continuing education activity for the purpose of renewal of Licensee's license to practice psychology, unless it is specifically stated in this Stipulation and Consent Order that the condition may be used for this purpose.

9. The Board or its authorized representatives shall have the right to obtain records from any person with whom Licensee has contact as a result of her compliance with this Stipulation and Consent Order. Licensee shall execute releases or other waivers necessary for submission of the reports referenced in this stipulation to enable the Board to obtain the

information it desires and to authorize the testimony of those contacted by the Board in any proceeding related to this matter.

10. Licensee shall execute any requested releases allowing the Board to exchange data related to this Stipulation and Consent Order with any professional Licensee contacts in furtherance of her compliance with this Order.

11. In the event Licensee resides or practices outside the State of Minnesota, Licensee shall promptly notify the Board in writing of the location of her residence and all work sites. Practice outside of Minnesota will not be credited toward any period of Licensee's suspended, limited, conditioned, or restricted license in Minnesota unless Licensee demonstrates to the satisfaction of the Board that the practice in another jurisdiction conforms completely with Licensee's Minnesota licensure requirements to practice psychology.

12. If Licensee shall fail, neglect, or refuse to fully comply with each of the terms, provisions, and conditions herein, the Committee shall schedule a hearing before the Board. The Committee shall mail Licensee a notice of the violation alleged by the Committee and of the time and place of the hearing. Licensee shall submit a response to the allegations at least three days prior to the hearing. If Licensee does not submit a timely response to the Board, the allegations may be deemed admitted.

At the hearing before the Board, the Committee and Licensee may submit affidavits made on personal knowledge and argument based on the record in support of their positions. The evidentiary record before the Board shall be limited to such affidavits and this Stipulation and Consent Order. Licensee waives a hearing before an administrative law judge and waives discovery, cross-examination of adverse witnesses, and other procedures governing administrative hearings or civil trials.

At the hearing, the Board will determine whether to impose additional disciplinary action, including additional conditions or limitations on Licensee's practice, or suspension, or revocation of Licensee's license.

13. This stipulation shall not in any way limit or affect the authority of the Board to take action against Licensee's license under Minn. Stat. § 148.941, subd. 3, or to initiate contested case proceedings against Licensee on the basis of any act, conduct, or omission of Licensee justifying disciplinary action occurring before or after the date of this Stipulation and Consent Order which is not related to the facts, circumstances, or requirements referenced herein.

14. In the event the Board at its discretion does not approve this settlement or a lesser remedy than indicated in this settlement, then, and in that event, this stipulation is withdrawn and shall be of no evidentiary value and shall not be relied upon nor introduced by either party to this stipulation, except that Licensee agrees that should the Board reject this stipulation and this case proceeds to hearing, Licensee will assert no claim that the Board was prejudiced by its review and discussion of this stipulation or of any records relating to this matter.

15. Any appropriate court may, upon application of the Board, enter its decree enforcing the order of the Board.

16. Licensee has been advised by Board representatives that she may choose to be represented by legal counsel in this matter. Licensee is represented by Patrick H. Elliot, Esq. The Committee is represented by Benjamin R. Garbe, Assistant Attorney General.

17. Licensee waives all formal hearings on this matter and all other procedures before the Board to which Licensee may be entitled under the 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.

18. Licensee hereby knowingly and voluntarily waives any and all claims against the Board, the Minnesota Attorney General, the State of Minnesota and their agents, employees and representatives which may otherwise be available to Licensee under the Americans With Disabilities Act or the Minnesota Human Rights Act relative to the action taken or authorized against Licensee's license to practice psychology under this stipulation.

19. Licensee hereby acknowledges that she has read, understands, and agrees to this stipulation and has freely and voluntarily signed the stipulation without threat or promise by the Board or any of its members, employees, or agents. When signing the stipulation, Licensee acknowledges she is fully aware the stipulation is not binding unless and until it is approved by the Board. The Board may either approve the Stipulation and Consent Order as proposed, approve the Stipulation and Consent Order subject to specified change, or reject it. If the changes are acceptable to Licensee, the stipulation will then take effect and the order as modified will be issued. If the changes are unacceptable to Licensee or the Board rejects the stipulation, it will be of no effect except as specified herein.

20. This Stipulation and Consent Order constitutes a disciplinary action against Licensee.

21. This Stipulation and Consent Order is a public document and will be sent to all appropriate data banks.

22. This stipulation contains the entire agreement between the parties there being no other agreement of any kind, verbal or otherwise, which varies this stipulation.

LICENSEE

Kathryne Sanders
KATHRYNE SANDERS, M.Eq., L.P.

Dated: 5/17/12

**BOARD OF PSYCHOLOGY
COMPLAINT RESOLUTION COMMITTEE**

Jeffrey Leichter
JEFFREY LEICHTER, Ph.D., L.P.
Committee Chair

Dated: 5-18-12

Patricia Orud
PATRICIA ORUD, M.A., L.P.
Committee Member

Dated: 5-18-12

SUSAN WARD
Committee Member

Dated: _____

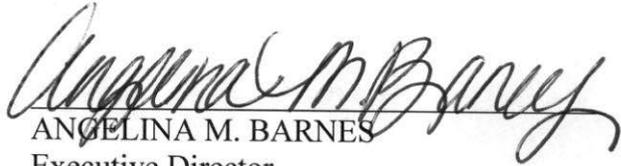
ORDER

Upon consideration of this stipulation and all the files, records, and proceedings herein,

IT IS HEREBY ORDERED that the license of Licensee is placed in a SUSPENDED status and that all other terms of this stipulation are adopted and implemented by the Board this

18th day of May, 2020.

MINNESOTA BOARD
OF PSYCHOLOGY


ANGELINA M. BARNES
Executive Director

AG: #2893720-v1