

**STATE OF VERMONT  
BOARD OF BARBERS AND COSMETOLOGISTS**

IN RE: )  
CHERI CAMPBELL ) Docket No: CO 01-0701  
Lic. No. 009-0002509 )

**STIPULATION AND CONSENT ORDER**

The Respondent, Cheri Campbell, and the State of Vermont, by its Attorney General, William H. Sorrell, stipulate to the statements of Board Authority, Facts and Understandings set forth below and agree to the entry of the following Consent Order by the Vermont State Board of Barbers and Cosmetologists as a final order in this matter.

**Board Authority**

- 1) The Vermont Board of Barbers and Cosmetologists has jurisdiction to investigate and adjudicate allegations of unprofessional conduct by cosmetologists and to approve consent orders entered by the parties pursuant to 3 V.S.A. §129; 26 V.S.A. §276; and the Board of Barbers and Cosmetologists Rules (hereinafter "Rules").
- 2) Failing to comply with provisions of federal or state statutes or rules governing the practice of the profession is unprofessional conduct upon which the Board may take disciplinary action. 3 V.S.A. §129a(a)(3).
- 3) Practicing or offering to practice beyond the scope permitted by law is unprofessional conduct upon which the Board may take disciplinary action. 26 V.S.A. §288(1).

**Facts**

- 4) Respondent, Cheri Campbell, was licensed as a cosmetologist by the State of Vermont holding license number 009-0002509.
- 5) Respondent was originally licensed on June 30, 1994 and her license expired on

November 30, 1999.

- 6) On or about May 11, 1999, Respondent was granted a license as a cosmetology shop under license number 012-0001823. This license is set to expire on November 30, 2003.
- 7) Respondent failed to renew her license on November 30, 1999.
- 8) Respondent has been operating without a current license since November 30, 1999.

### **Charges**

#### **Count I- Practice without Current License(s)**

- A. The acts and circumstances described above constitute unprofessional conduct pursuant to:
  - (1) Failing to comply with provisions of federal or state statutes or rules governing the practice of the profession. 3 V.S.A. §129a(a)(3); and
  - (2) Practicing or offering to practice beyond the scope permitted by law. 26 V.S.A. §288(1).

#### **Count II- Failure to Properly Post License(s)**

- B. The acts and circumstances described above constitute unprofessional conduct pursuant to:
  - (1) Failing to comply with provisions of federal or state statutes or rules governing the practice of the profession. 3 V.S.A. §129a(a)(3); and
  - (2) all personnel licenses shall be displayed together at eye level at the front entrance of the shop. Rule 3.12(B)(4).

### **Understandings**

- A. The Respondent understands that the Board of Barbers and Cosmetologists must review and accept the terms of the Order set forth below and that if the Board rejects all or any portion of the Order, then this entire document shall be null and void.
- B. The Respondent has read and reviewed this entire document and agrees that it contains the entire agreement between the parties.
- C. The Respondent is not under the influence of any drugs or alcohol at the time this document is being signed.
- D. The Respondent agrees that she has had sufficient opportunity to consult with legal counsel before signing this document.
- E. The Respondent agrees to settle the charge against her on the terms set forth in this order and is voluntarily waiving her right to a contested hearing before the Board of Barbers and Cosmetologists.
- F. The Respondent agrees that the Order set forth immediately below may be entered by the Board of Barbers and Cosmetologists.

### **Consent Order**

G. Based on the above stipulations, it is **ADJUDGED** as follows:

(1) The "Facts" listed above are true; and

(2) The Respondent has engaged in unprofessional conduct in that the Respondent has:

- (a) Failed to comply with provisions of federal or state statutes or rules governing the practice of the profession. 3 V.S.A. §129a(a)(3);
- (b) Practicing or offering to practice beyond the scope permitted by law. 26 V.S.A. §288(1);
- (c) Failed to have all licenses and registrations conspicuously displayed for the customer in the licensee's principal office or place of business in violation of 26 V.S.A. §284(c); and
- (d) Failed to maintain all personnel licenses displayed together at eye level at the front entrance of the shop in violation of Rule 3.12(B)(4).

H. Based on the above stipulation and on the above Findings and Conclusions of this Board, it is **ORDERED** as follows:

(a) The Board hereby **REPRIMANDS** Respondent's license.

I. Notwithstanding any provision above, Respondent must meet all Board of Barbers and Cosmetologists requirements for license renewal and license reinstatement.

J. This Stipulation and Consent Order is a matter of public record and may be reported to other licensing authorities as provided in 3 V.S.A. §129(a).

K. This Stipulation and Consent Order will remain part of the Respondent's licensing file and may be used in determining sanctions in future disciplinary matters.

Office of the  
ATTORNEY  
GENERAL  
109 State Street  
Montpelier, VT  
05609

**AGREED TO:**

BY: **CHERI CAMPBELL**  
**RESPONDENT**

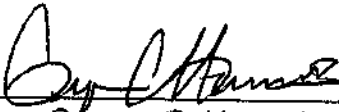
Date: 1/7/02

Cheri Campbell

Cheri Campbell

AND BY: STATE OF VERMONT  
WILLIAM H. SORRELL  
ATTORNEY GENERAL

Date: 1/9/02

  
George C. Haegele IV  
Assistant Attorney General

ACCEPTED AND SO ORDERED:

BOARD OF BARBERS AND  
COSMETOLOGISTS

Date: 2/25/02

  
Chairperson

Dated entered: 2/25/02

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