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ATTORNEY GENERAL OF NEW JERSEY**

Division of Law  
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P.O. Box 45029  
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By: Wendy Leggett Faulk  
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Attorney for the Board of Nursing  
Home Health Aide Unit

STATE OF NEW JERSEY  
DEPARTMENT OF LAW & PUBLIC SAFETY  
DIVISION OF CONSUMER AFFAIRS  
STATE BOARD OF NURSING

IN THE MATTER OF THE SUSPENSION  
OR REVOCATION OF THE  
CERTIFICATE OF

**Sandra Simon, C.H.H.A.  
Certificate No. 26NH15676400**

TO PRACTICE AS A CERTIFIED  
HOMEMAKER-HOME HEALTH AIDE  
IN THE STATE OF NEW JERSEY

Administrative Action

**CONSENT ORDER OF  
VOLUNTARY SURRENDER  
TO BE DEEMED A  
TEMPORARY SUSPENSION**

This matter was opened to the New Jersey State Board of Nursing (the "Board") upon receipt of information indicating that Sandra Simon, C.H.H.A. ("Respondent"), holder of certificate number **26NH15676400**, was arrested on November 7, 2016, by officers of the Carteret Police Department and charged with one count of murder, in violation of N.J.S.A. 2C:11-3(a)(1), and one count possession of a weapon for an unlawful purpose, in violation of N.J.S.A. 2C:39-4(d). Specifically, it is alleged that Respondent struck a male with an object, causing blunt force trauma to his head, which resulted in his death.

The allegations, if proven, would demonstrate that Respondent engaged in acts constituting a crime or offense of moral turpitude and relating adversely to the practice of a certified homemaker home-health aide, and would provide grounds for discipline against Respondent's certificate to practice as a homemaker-home health aide in the State of New Jersey pursuant to N.J.S.A. 45:1-21(f). Respondent agrees to resolve this matter on an interim basis without formal disciplinary proceedings, and to voluntarily surrender her certificate without making admissions and without prejudicing her ability to defend any criminal action against her.

The Board, finding the within disposition adequately protective of the public health, safety and welfare of the people of New Jersey, and other good cause having been shown:

**IT IS ON THIS 22<sup>nd</sup> day of May 2017, HEREBY ORDERED AND AGREED THAT:**

1. Respondent shall voluntarily surrender her certification to practice as a certified homemaker-home health aide in the State of New Jersey, to be deemed a temporary suspension, and to be effective immediately. Respondent's certificate shall remain temporarily suspended pending disposition of all criminal charges against her, and until further Order of the Board.

2. Respondent shall immediately cease holding herself out as a Certified Homemaker-Home Health Aide and/or practicing as a certified homemaker-home health aide in New Jersey, which includes but is not limited to, performing delegated nursing regimens or nursing tasks delegated through the authority of a duly licensed professional nurse. Any such practice by Respondent constitutes grounds for a charge of unlicensed practice pursuant to N.J.S.A. 45:1-25.

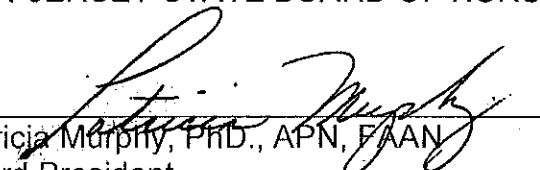
3. Respondent shall immediately surrender her most recent certificate to

practice as a certified homemaker-home health aide, and any biennial registration cards, to the Board by submitting the same, together with this signed Order, to the Office of the Attorney General, Division of Law, Attention: *Wendy Leggett Faulk, DAG*, at 124 Halsey Street, Sixth Floor, P.O. Box 45029, Newark, New Jersey, 07101.

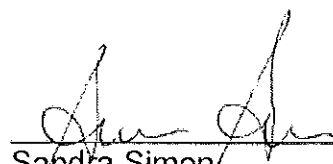
4. Nothing contained herein shall be deemed an admission of liability by Respondent, nor prejudice her ability to defend against any civil or criminal charges.

5. Respondent acknowledges that she has been specifically advised of her right to have this Consent Order reviewed by an attorney of her choosing. Respondent enters this Consent Order knowingly and voluntarily, and acknowledges that there have been no other representations or agreements not stated in writing herein.

NEW JERSEY STATE BOARD OF NURSING

By:   
Patricia Murphy, PhD., APN, FAAN  
Board President

I have read the Consent Order above. I understand what it says and I agree to be bound by the terms. I know it is an important legal document and that I have a right to have it reviewed by an attorney. I choose to enter into this agreement with the Board of Nursing without being advised by an attorney. I give my consent to the Board of Nursing to enter this Order.

  
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Sandra Simon  
Certificate No. 26NH15676400 (Sign Name)

Date: 05/11/2017