

COPY

**CONSENT AGREEMENT  
BETWEEN  
CRYSTAL STANLEY  
AND THE  
STATE OF OHIO COUNSELOR AND SOCIAL WORKER BOARD**

This CONSENT AGREEMENT is entered into by and between CRYSTAL STANLEY, hereinafter, "STANLEY", and the STATE OF OHIO COUNSELOR AND SOCIAL WORKER BOARD, hereinafter "BOARD", the state agency charged with enforcing Chapter 4757 of the Ohio Revised Code and all rules promulgated thereunder.

STANLEY hereby acknowledges that she has read and understands this CONSENT AGREEMENT and has voluntarily entered into it without threat or promise by the BOARD or any of its members, employees or agents.

STANLEY is fully aware of her rights, including her right to be advised by counsel and her right to a hearing pursuant to Chapter 119 of the Ohio Revised Code on the issues which are the subject of this CONSENT AGREEMENT. Should STANLEY fail to comply with any provisions of this CONSENT AGREEMENT, STANLEY knowingly waives her rights under ORC Chapter 119.

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

This CONSENT AGREEMENT is entered into on the basis of the following stipulations, admissions and understandings:

1. STANLEY is a social worker (S-26013) licensed to practice social work in the state of Ohio, and is subject to the laws and rules of Ohio regulating the practice of social work as outlined in Ohio Revised Code Chapter 4757. STANLEY received her social work license on November 20, 1998.

2. **STANLEY** was employed at Murtis H. Taylor Multi-Service Center, Cleveland, Ohio, from December 18, 2000, through April 27, 2001. From on or about February 1, 2001, through on or about April 27, 2001, **STANLEY** falsified the records of a client by creating case notes that implied **STANLEY** had seen the client six (6) times. The client had died February 21, 2001. **STANLEY'S** conduct is a violation of Ohio Revised Code Section 4757.36(A)(1) and Ohio Administrative Code Section 4757-5-01(D)(1)
3. **STANLEY** admits the statements referenced in paragraphs 1 through 2 referenced above.

Wherefore, in consideration of the foregoing and mutual promises hereinafter set forth, and in lieu of any further formal disciplinary proceedings, **STANLEY** knowingly and voluntarily agrees with the **BOARD** to the following terms and conditions:

1. **STANLEY'S** social work license is SUSPENDED for one (1) year from the date of this Consent Agreement.

It is hereby agreed by and between both parties that this **CONSENT AGREEMENT** hereby settles all issues concerning this matter.

By her signature on this **CONSENT AGREEMENT**, **STANLEY** acknowledges that in the event the **BOARD**, in its discretion, does not approve this **CONSENT AGREEMENT**, this settlement offer is withdrawn and shall be of no evidentiary value and shall not be relied upon or introduced in any disciplinary action or appeal by either party. **STANLEY** agrees that should the **BOARD** reject this **CONSENT AGREEMENT** and if this case proceeds to hearing, she will assert no claim that the **BOARD** was prejudiced by its review and discussion of this **CONSENT AGREEMENT** or of any information relating thereto.

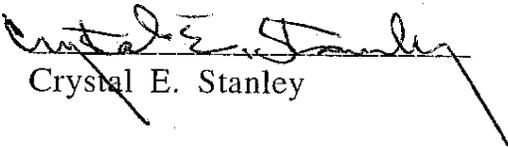
**STANLEY** hereby releases the members of the **BOARD**, its officers and employees, jointly and severally, from any and all liability arising from the matter within.

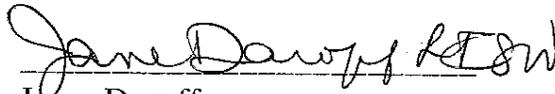
This CONSENT AGREEMENT shall be considered a public record as that term is used in Section 149.43 of the Ohio Revised Code. Pursuant to 42 USC Section 132a-73(b), 5 USC Section 552a, 45 CFR part 61 and Ohio Revised Code Section 2301.373(E), the **BOARD** may be required to provide **STANLEY'S** social security number to requesting governmental agencies.

The **BOARD** shall incorporate this CONSENT AGREEMENT into a formal journal entry at its September, 2001, meeting.

This CONSENT AGREEMENT shall take effect upon the date of the last signature below:

THE OHIO COUNSELOR AND  
SOCIAL WORKER BOARD

  
Crystal E. Stanley

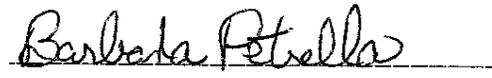
  
Jane Daroff  
Chair, Counselor and Social Worker Board

4.7.01  
Date

\_\_\_\_\_  
Counsel for Ms. Stanley

\_\_\_\_\_  
Date

9/21/01  
Date

  
Barbara Petrella, Esq.  
Assistant Attorney General  
Counselor and Social Worker Board

9/20/01  
Date