

STATEMENT OF ALLEGATIONS

GABRIELLE DUFFENAI
(formerly Gabrielle Chiasson-Budaker)
Registration Numbers 20-105 and 030783

IT IS ALLEGED THAT:

1. At all material times, Gabrielle Duffenais, formerly Gabrielle Chiasson-Budaker ("**Mrs. Duffenais**"), was duly registered with the Nurses Association of New Brunswick ("**NANB**") as a Graduate Nurse.
2. On or about June 5, 2020, Mrs. Duffenais committed acts of professional misconduct as defined in subsection 2(1) of the **Nurses Act** in that, while employed as a Graduate Nurse at the [] (the "**Hospital**"), she digressed from established or recognized professional standards or rules of practice of the profession, including but not limited to the NANB **Standards of Practice for Registered Nurses** and the NANB **Standards for Documentation**, and she engaged in conduct unbecoming of a member and dishonesty as provided by subparagraphs 28(1)(a)(ii) and 28(1)(a)(iv) of the **Nurses Act**, in one or more of the following ways:
 - a. On June 5, 2020, Mrs. Duffenais altered, or caused to be altered, a confirmation of employment letter prepared by [] (the "**Health Authority**") dated June 5, 2020, and she submitted the altered letter to the [] (the "**Bank**") that same day for the purpose of applying for a mortgage.
 - b. Mrs. Duffenais' alterations to the confirmation of employment letter prepared by the Health Authority dated June 5, 2020, included, but were not limited to:
 - i. Replacing the Health Authority's logo with the typed word "[]";
 - ii. Deleting Mrs. Duffenais' hire date;
 - iii. Deleting Mrs. Duffenais' expected date of return to her casual position;
 - iv. Deleting a statement that Mrs. Duffenais was guaranteed 37.5 hours per pay period and inserting a statement that she was currently getting 75 hours per pay period;
 - v. Deleting a statement that as a casual employee, Mrs. Duffenais was not guaranteed work hours but she had the option to pick up shifts when needed;
 - vi. Deleting the contact information for the Health Authority's Human Resources Department;
 - vii. Duplicating a portion of the word "sincerely" above the signature line; and
 - viii. Amending the name of the signatory of the Health Authority's confirmation of employment letter so that the name was misspelled in the altered letter.
 - c. Mrs. Duffenais failed to exercise reasonable judgment as required by standard 2.5 of the NANB **Standards of Practice for Registered Nurses**.

- d. Mrs. Duffenais failed to demonstrate a professional presence and model professional behaviour as required by standard 3.1 of the NANB ***Standards of Practice for Registered Nurses***.
- e. Mrs. Duffenais failed to document according to professional and ethical standards as required by standard 2 of the NANB ***Standards for Documentation***.
- f. Ms. Duffenais deleted, altered, and/or modified someone else's documentation, in violation of standard 2.7 of the NANB ***Standards for Documentation***.
- g. By altering the confirmation of employment letter prepared by the Health Authority dated June 5, 2020, or by causing the letter to be altered, and by submitting the altered letter to the Bank on June 5, 2020 for the purpose of applying for a mortgage, Mrs. Duffenais falsified a document relating to her nursing practice and engaged in fraudulent, dishonest, and unethical behaviour.
- h. Mrs. Duffenais failed to practice in accordance with the Canadian Nurses Association's ***Code of Ethics for Registered Nurses***, as required by standard 1.3 of the NANB ***Standards of Practice for Registered Nurses***, by failing to be honest and failing to practice with integrity in all of her professional interactions, as required by Part 1, section G, item 2 of the Canadian Nurses Association's ***Code of Ethics for Registered Nurses***.