Date: October 1, 2021

The charge of misconduct or incompetence is brought against you for:

1. On or about September 27, 2021, at approximately 5:00 p.m., in your title of T & R Ctr Nurse II at the State University of New York – Stony Brook University Hospital, you violated the August 18, 2021 Public Health Law §16 Order issued by the NYS Department of Health ("DOH") Commissioner Howard Zucker requiring that all "covered personnel" receive the first dose of the COVID-19 Vaccine by September 27, 2021, when you failed to do the same.

2. On or about September 27, 2021, at approximately 5:00 p.m., in your title of T & R Ctr Nurse II at the State University of New York – Stony Brook University Hospital, you engaged in misconduct when you failed to receive the first dose of the COVID-19 Vaccine by September 27, 2021, as required by the August 18, 2021 Public Health Law §16 Order issued by the NYS DOH Commissioner Howard Zucker.

3. On or about September 27, 2021, at approximately 5:00 p.m., in your title of T & R Ctr Nurse II at the State University of New York – Stony Brook University Hospital, you were derelict in your duties when you failed to receive the first dose of the COVID-19 Vaccine by September 27, 2021, as required by the August 18, 2021 Public Health Law §16 Order issued by the NYS DOH Commissioner Howard Zucker.

4. On or about September 27, 2021, at approximately 5:00 p.m., in your title of T & R Ctr Nurse II at the State University of New York – Stony Brook University Hospital, you were incompetent when you failed to receive the first dose of the COVID-19 Vaccine by September 27, 2021, as required by the August 18, 2021 Public Health Law §16 Order issued by the NYS DOH Commissioner Howard Zucker.

5. On or before September 27, 2021, at approximately 5:00 p.m. in your title of T & R Ctr Nurse II at the State University of New York – Stony Brook University Hospital, you were insubordinate when you failed to receive the first dose of the COVID-19 Vaccine by September 27, 2021, as directed by Chief Human Resource Officer, Colette Brown's letter of September 20, 2021 and required by the August 18, 2021 Public Health Law §16 Order issued by the NYS DOH Commissioner Howard Zucker.

The proposed penalty for this Notice of Discipline is Termination