

**STATE OF VERMONT
BOARD OF MEDICAL PRACTICE**

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| In re: Paul B. Jerard, PA-C |) | Docket Nos. MPS 013-0222 & |
| |) | MPS 204-1023 |
| |) | |

STIPULATION AND CONSENT ORDER

NOW COME the State of Vermont, by and through Vermont Attorney General Charity R. Clark, and Paul B. Jerard, PA-C and stipulate and agree as follows:

1. Paul B. Jerard, PA-C (“Respondent”) was first licensed to practice medicine in Vermont on October 5, 2005. His medical license number 055.0030745 expired on January 31, 2026. Respondent is a physician assistant.
2. Jurisdiction in this matter vests with the Vermont Board of Medical Practice pursuant to 26 V.S.A. §§ 1353-54, 1370-74, 1736-37, Board Rule 45.1.2, 3 V.S.A. §§ 809-814, and other authority.

Findings of Fact

3. Respondent worked as a physician assistant in the Emergency Department at the University of Vermont Medical Center (“UVMCM”) from 2009 until January 6, 2022. Respondent worked as a physician assistant at ClearChoiceMD Urgent Care (“ClearChoice”) in South Burlington, Vermont in 2022 and 2023.
4. The Board opened docket number MPN 013-0222 in December 2021 after it received information that a patient (“Patient 1”) alleged that Respondent touched her in an unauthorized and unwanted manner during an exam at UVMCM.
5. The Board opened docket number MPN 204-1023 in October 2023 after a patient (“Patient 2”) filed a complaint alleging that Respondent made inappropriate and/or insensitive remarks to her during an exam at ClearChoice.

6. The Board assigned the investigations of both matters to the South Investigative Committee.

7. Respondent examined Patient 1 after she presented with symptoms that she believed to be related to kidney stones.

8. As part of the exam, Respondent palpated Patient 1's lower stomach near her hip where she was experiencing pain.

9. Patient 1 believed that the exam was unnecessarily intimate.

10. After Patient 1 complained to UVMMC, Respondent's employment was terminated.

11. Respondent examined Patient 2 after she presented with pelvic pain that she thought was caused by ruptured ovarian cysts.

12. As part of the exam, Respondent asked Patient 2 questions about her sexual history that she felt were unprofessional and caused her embarrassment.

13. Respondent cooperated with the Committee's investigation and provided relevant information to the Committee.

Conclusions of Law

14. Respondent's conduct described in paragraphs 1-13 constitutes disruptive behavior that could reasonably have been expected to adversely affect the quality of care rendered to a patient in violation of 26 V.S.A. § 1354(a)(35).

15. Consistent with Respondent's cooperation with the Board, and even though certain aspects of the foregoing patient complaints remain in dispute, Respondent nevertheless wishes to avoid the time, expense, and uncertainty of proceeding to a contested hearing on these issues; further, Respondent acknowledges that if the State were to file charges it could likely

satisfy its burden at a hearing and a finding adverse to him could be entered by the Board pursuant to 26 V.S.A. § 1354(a)(35).

16. Respondent agrees that the Board may adopt as its facts and conclusions in this matter Paragraphs 1-22 and further agrees that this is an adequate basis for the Board actions set forth herein. Any representation by Respondent herein is made solely for the purposes set forth in this agreement.

17. Therefore, in the interest of Respondent's desire to fully and finally resolve the matter presently before the Board, he has determined that he shall enter into this agreement with the Board. Respondent enters no further admissions here, but to resolve this matter without further time, expense, and uncertainty he has concluded that this agreement is acceptable and in the best interest of the parties.

18. Respondent agrees and understands that by executing this document he is waiving any right to challenge the jurisdiction and continuing jurisdiction of the Board in this matter, to be presented with a specification of charges and evidence, to cross-examine witnesses, and to offer evidence of his own to contest any allegations by the State.

19. The parties agree that upon the Board's acceptance of this Stipulation and Consent Order, and pursuant to the terms herein, the above-captioned matter shall be resolved by the Board. Thereafter, the Board will take no further action as to this matter absent non-compliance with the terms and conditions of this document by Respondent.

20. This Stipulation and Consent Order is conditioned upon its acceptance by the Board. If the Board rejects any part of this document, the entire agreement shall be considered void. Respondent agrees that if the Board does not accept this agreement in its current form, he shall not assert in any subsequent proceeding any claim of prejudice from any such prior

consideration. If the Board rejects any part of this agreement, none of its terms shall bind Respondent or constitute an admission of any of the facts of the alleged misconduct, it shall not be used against Respondent in any way, it shall be kept in strict confidence, and it shall be without prejudice to any future disciplinary proceeding and the Board's final determination of any charge against Respondent.

21. Respondent acknowledges and understands that this Stipulation and Consent Order shall be a matter of public record, shall be entered in his permanent Board file, shall constitute an enforceable legal agreement, and may and shall be reported to other licensing authorities, including but not limited to the Federation of State Medical Boards Board Action Databank and the National Practitioner Data Bank. In exchange for the actions by the Board, as set forth herein, Respondent expressly agrees to be bound by all terms and conditions of this Stipulation and Consent Order.

22. The parties therefore agree that should the terms and conditions of this Stipulation and Consent Order be deemed acceptable by the Board, it may enter an order implementing the terms and conditions herein.

ORDER

WHEREFORE, based on the foregoing and the consent of Respondent, it is hereby ORDERED that:

Effective upon entry of this Order, Respondent's rights to renew his Vermont medical license and seek a new license from the Board are hereby PERMANENTLY SURRENDERED. Respondent agrees that his surrender of these rights shall be final and irrevocable and he shall not seek by any means licensure, reinstatement, or relicensure as a physician assistant in Vermont, regardless of circumstances or passage of time.

SIGNATURES

Dated at _____, Vermont, this 27 day of March, 2026.



Suzanne Jones, PA-C
Chair, South Investigative Committee
Vermont Board of Medical Practice

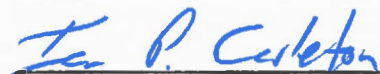
Dated at South Burlington, Vermont, this 22 day of March, 2026.



Paul B. Jerard, PA-C
Respondent

APPROVED AS TO LEGAL FORM:

Dated at Burlington, Vermont, this 24th day of March, 2026.



Ian P. Carleton, Esq.
Sheehey Furlong & Behm, P.C.
P.O. Box 66
Burlington, VT 05402
Counsel for Respondent

Dated at Montpelier, Vermont, this 18th day of March, 2026.

Kurt A. Kuehl Digitally signed by Kurt A. Kuehl
Date: 2026.03.18 16:08:03 -04'00'

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