

BEFORE THE TEXAS BOARD OF NURSING

In the Matter of Vocational Nurse § AGREED
License Number 119092 §
issued to BETTY JOYCE RICHARD § ORDER

On this day the Texas Board of Nursing, hereinafter referred to as the Bo. considered the matter of BETTY JOYCE RICHARD, Vocational Nurse License Number 1190 hereinafter referred to as Respondent.

Information received by the Board produced evidence that Respondent may have violated TEX. REV. CIV. STAT. ART. 4528c, Sec.10(a)(3)&(9)(effective 9/1/1985) Texas Occupations Code. Respondent waived representation by counsel, informal proceedings, notice and hearing, and agreed to the entry of this Order offered on June 30, 2011, by Katherine A. Thomas, MN, RN, Executive Director, subject to ratification by the Board.

FINDINGS OF FACT

1. Prior to the institution of Agency proceedings, notice of the matters specified below in these Findings of Fact was served on Respondent and Respondent was given an opportunity to show compliance with all requirements of the law for retention of the license(s).
2. Respondent waived representation by counsel, informal proceedings, notice and hearing, and agreed to the entry of this Order.
3. Respondent is currently licensed to practice vocational nursing in the State of Texas.
4. Respondent received a Certificate in Vocational Nursing from Blinn College, Brenham, Texas, on August 21, 1987. Respondent was licensed to practice vocational nursing in the State of Texas on December 2, 1987.
5. Respondent's nursing employment history is unknown:



I do hereby certify this to be a complete, accurate, and true copy of the document which is on file or is of record in the offices of the Texas Board of Nursing.
Katherine A. Thomas
Executive Director of the Board

6. On or about January 3, 1990, Respondent entered a plea of Guilty and was convicted of THEFT BY CHECK (a Misdemeanor offense committed on December 22, 1989), in the County Court at Law of Lee County, Texas, under Cause Number 10,809. As a result of the conviction, Respondent was ordered to pay a fine and court costs.
7. On or about May 16, 1990, Respondent entered a plea of Guilty to THEFT (a Class B Misdemeanor offense committed on April 2, 1989), in the County Court at Law No.1 of Williamson County, Texas, under Cause Number 27116. As a result of the plea, the proceedings against Respondent were deferred without entering an adjudication of guilt and Respondent was placed on probation for a period of eighteen (18) months. Additionally, Respondent was ordered to pay a fine and court costs.
8. On or about December 13, 1990, Respondent entered a plea of Guilty and was convicted of THEFT BY CHECK (a Misdemeanor offense committed on April 12, 1989), in the County Court at Law of Bastrop County, Texas, under Cause Number 20,519. As a result of the conviction, Respondent was sentenced to confinement in the Bastrop County Jail for a period of one hundred eighty (180) days; however, the imposition of the sentence of confinement was suspended, and Respondent was placed on probation for a period of hundred eighty (180) days. Additionally, Respondent was ordered to pay restitution in the amount of three hundred eighty-nine (\$389) dollars, a fine, and court costs.

On or about July 21, 1994, Respondent's probation granted under Cause Number 20,519 was revoked, and Respondent was sentenced to confinement in the Bastrop County Jail for a period of ninety (90) days, with twenty-two (22) days credit given.

9. On or about July 17, 1991, Respondent entered a plea of Guilty and was convicted of THEFT BY CHECK (a Misdemeanor offense committed on August 2, 1990), in the County Court of Lee County, Texas, under Cause Number 10,902. As a result of the conviction, Respondent was ordered to pay a fine and court costs.
10. On or about October 27, 1993, Respondent entered a plea of Guilty and was convicted of FAIL TO MAINTAIN FINANCIAL RESPONSIBILITY (a Class B Misdemeanor offense committed on August 12, 1993), in the County Court at Law No. 1 of Williamson County, Texas, under Cause Number 93-40098-1. As a result of the conviction, Respondent was ordered to pay a fine and court costs. On or about October 27, 1993, Respondent was charged with FAIL TO ID AS WITNESS, under Cause Number 93-40097-I. Cause Number 93-40097-I was taken into consideration during the sentencing phase of Cause Number 93-40098-I.
11. On or about October 27, 1993, Respondent's probation granted under Cause Number 27,116, for the offense of THEFT was revoked. As a result of the revocation, Respondent was adjudged Guilty of the Class B Misdemeanor offense of THEFT committed on April 2, 1989. Furthermore, Respondent was sentenced to confinement in the Williamson County Jail for

a period of six (6) months; however, the imposition of the sentence of confinement was suspended, and Respondent was placed on probation for a period of twenty-four (24) months. Additionally Respondent was ordered to pay restitution in the amount of two thousand, one hundred sixteen dollars and ninety-four cents (\$2116.94), and court costs.

On or about September 16, 1994, Respondent's probation granted under Cause Number 27,116 was revoked, and Respondent was sentenced to confinement in the Williamson County Jail for a period of sixty (60) days, with three (3) days credit given. Additionally, Respondent was ordered to pay a fine and court costs.

12. On or about April 7, 1994, Respondent entered a plea of Guilty and was convicted of 3 COUNTS OF FORGERY (a 3rd Degree Felony offense committed on July 20, 1992 and August 14, 1992), in the 21st District Court of Burleson County, Texas, under Cause Number 11,049. As a result of the conviction, Respondent was sentenced to confinement in the Texas Department of Criminal Justice Institutional Division for a period of ten (10) years; however, the imposition of the sentence of confinement was suspended, and Respondent was placed on probation for a period of ten (10) years. Additionally, Respondent was ordered to pay restitution in the amount of one hundred seventy-seven dollars and ninety-five cents (\$177.95), a fine, and court costs.
13. On or about August 13, 1998, Respondent entered a plea of Guilty and was convicted of THEFT BY CHECK (a Class B Misdemeanor offense committed on August 1, 1997), in the County Court at Law of McLennan County, Texas, under Cause Number 98-2110CR2. As a result of the conviction, Respondent was sentenced to confinement in the McLennan County Jail for a period of one hundred and eighty (180) days. Additionally, Respondent was ordered to pay a fine and court costs.
10. Formal Charges were filed on May 13, 2011.
11. Formal Charges were mailed to Respondent on May 16, 2011.

CONCLUSIONS OF LAW

1. Pursuant to Texas Occupations Code, Sections 301.451-301.555, the Board has jurisdiction over this matter.
2. Notice was served in accordance with law.
3. The evidence received is sufficient to prove violations of TEX. REV. CIV. STAT. ART. 4528c, Sec.10(a)(3)&(9)(effective 9/1/1985 through 9/1/1993), and 22 TEX. ADMIN. CODE §239.11(22)(A)(effective 9/1/1985 through 9/1/1993).

4. The evidence received is sufficient cause pursuant to Section 301.452(b), Texas Occupations Code, to take disciplinary action against Vocational Nurse License Number 119092, heretofore issued to BETTY JOYCE RICHARD, including revocation of Respondent's license(s) to practice nursing in the State of Texas.

ORDER

IT IS THEREFORE AGREED and ORDERED, subject to ratification by the Texas Board of Nursing, that RESPONDENT SHALL receive the sanction of a WARNING WITH STIPULATIONS, and RESPONDENT SHALL comply in all respects with the Nursing Practice Act, Texas Occupations Code, §§301.001 *et seq.*, the Rules and Regulations Relating to Nurse Education, Licensure and Practice, 22 TEX. ADMIN. CODE §211.1 *et seq.* and this Order.

IT IS FURTHER AGREED and ORDERED that, while under the terms of this Order, this Order SHALL apply to any and all future licenses issued to Respondent to practice nursing in the State of Texas.

IT IS FURTHER AGREED and ORDERED that this Order SHALL be applicable to Respondent's nurse licensure compact privileges, if any, to practice nursing in the State of Texas.

IT IS FURTHER AGREED and ORDERED that while Respondent's license(s) is/are encumbered by this Order, Respondent may not work outside the State of Texas pursuant to a nurse licensure compact privilege without the written permission of the Texas Board of Nursing and the Board of Nursing in the party state where Respondent wishes to work.

IT IS FURTHER AGREED that:

(1) RESPONDENT SHALL, within one (1) year of entry of this Order, successfully complete a course in Texas nursing jurisprudence and ethics. RESPONDENT SHALL obtain Board approval of the course prior to enrollment only if the course is not being offered by a pre-approved

provider. Home study courses and video programs will not be approved. In order for the course to be approved, the target audience shall include nurses. It shall be a minimum of six (6) hours in length. The course's content shall include the Nursing Practice Act, standards of practice, documentation of care, principles of nursing ethics, confidentiality, professional boundaries, and the Board's Disciplinary Sanction Policies regarding: Sexual Misconduct; Fraud, Theft and Deception; Nurses with Substance Abuse, Misuse, Substance Dependency, or other Substance Use Disorder; and Lying and Falsification. Courses focusing on malpractice issues will not be accepted. RESPONDENT SHALL CAUSE the sponsoring institution to submit a Verification of Course Completion form, provided by the Board, to the Office of the Board to verify RESPONDENT'S successful completion of the course. This course shall be taken in addition to any other courses stipulated in this Order, if any, and in addition to any continuing education requirements the Board has for relicensure. *Board-approved courses may be found at the following Board website address: <http://www.bon.state.tx.us/disciplinaryaction/stipscourses.html>.*

(2) RESPONDENT SHALL, within one (1) year of entry of this Order, successfully complete the course "Sharpening Critical Thinking Skills," a 3.6 contact hour online program provided by the National Council of State Boards of Nursing (NCSBN) Learning Extension. In order to receive credit for completion of this program, RESPONDENT SHALL SUBMIT the continuing education certificate of completion for this program to the Board's office, to the attention of Monitoring. This course is to be taken in addition to any continuing education requirements the Board may have for relicensure. *Information regarding Board-approved courses may be found at the following Board website address: <http://www.bon.state.tx.us/disciplinaryaction/stipscourses.html>.*

IT IS FURTHER AGREED, SHOULD RESPONDENT PRACTICE AS A NURSE IN THE STATE OF TEXAS, RESPONDENT WILL PROVIDE DIRECT PATIENT CARE AND PRACTICE IN A HOSPITAL, NURSING HOME, OR OTHER CLINICAL SETTING AND RESPONDENT MUST WORK IN SUCH SETTING A MINIMUM OF SIXTY-FOUR (64) HOURS PER MONTH UNDER THE FOLLOWING STIPULATIONS FOR ONE (1) YEAR OF EMPLOYMENT. THE LENGTH OF THE STIPULATION PERIOD WILL BE EXTENDED UNTIL SUCH TWELVE (12) MONTHS HAVE ELAPSED. PERIODS OF UNEMPLOYMENT OR OF EMPLOYMENT THAT DO NOT REQUIRE THE USE OF A REGISTERED NURSE (RN) OR A VOCATIONAL NURSE (LVN) LICENSE, AS APPROPRIATE, WILL NOT APPLY TO THIS STIPULATION PERIOD:

(3) RESPONDENT SHALL notify each present employer in nursing of this Order of the Board and the stipulations conditions on RESPONDENT'S license(s). RESPONDENT SHALL present a complete copy of this Order and all Proposals for Decision issued by the Administrative Law Judge, if any, to each present employer within five (5) days of receipt of this Order. RESPONDENT SHALL notify all future employers in nursing of this Order of the Board and the stipulations conditions on RESPONDENT'S license(s). RESPONDENT SHALL present a complete copy of this Order and all Proposals for Decision issued by the Administrative Law Judge, if any, to each future employer prior to accepting an offer of employment.

(4) RESPONDENT SHALL CAUSE each present employer in nursing to submit the Notification of Employment form, which is provided to the Respondent by the Board, to the Board's office within ten (10) days of receipt of this Order. RESPONDENT SHALL CAUSE each future employer to submit the Notification of Employment form, which is provided to the

Respondent by the Board, to the Board's office within five (5) days of employment as a nurse.

(5) RESPONDENT SHALL be supervised by a Registered Nurse, if licensed as a Registered Nurse, or by a Licensed Vocational Nurse or a Registered Nurse, if licensed as a Licensed Vocational Nurse, who is on the premises. The supervising nurse is not required to be on the same unit or ward as RESPONDENT, but should be on the facility grounds and readily available to provide assistance and intervention if necessary. The supervising nurse shall have a minimum of two (2) years experience in the same or similar practice setting to which the Respondent is currently working. RESPONDENT SHALL work only regularly assigned, identified and predetermined unit(s). RESPONDENT SHALL NOT be employed by a nurse registry, temporary nurse employment agency, hospice, or home health agency. RESPONDENT SHALL NOT be self-employed or contract for services. Multiple employers are prohibited.

(6) RESPONDENT SHALL CAUSE each employer to submit, on forms provided to the Respondent by the Board, periodic reports as to RESPONDENT'S capability to practice nursing. These reports shall be completed by the nurse who supervises the RESPONDENT. These reports shall be submitted by the supervising nurse to the office of the Board at the end of each three (3) month period for one (1) year of employment as a nurse.

IT IS FURTHER AGREED, that upon full compliance with the terms of this Order, all encumbrances will be removed from RESPONDENT'S license(s) to practice nursing in the State of Texas and RESPONDENT shall be eligible for nurse licensure compact privileges, if any.

RESPONDENT'S CERTIFICATION

I understand that I have the right to legal counsel prior to signing this Agreed Order.

I waive representation by counsel. I have reviewed this Order. I neither admit nor deny the violations alleged herein. By my signature on this Order, I agree to the Findings of Fact, Conclusions of Law, Order, and any conditions of said Order, to avoid further disciplinary action in this matter. I waive judicial review of this Order. I understand that this Order is subject to ratification by the Board. When this Order is ratified, the terms of this Order become effective, and a copy will be mailed to me. I understand that if I fail to comply with all terms and conditions of this Order, I will be subject to investigation and disciplinary sanction, including revocation of my license(s) to practice nursing in the State of Texas, as a consequence of my noncompliance.

Signed this 9 day of August, 2011.

Betty Joyce Richard
BETTY JOYCE RICHARD, Respondent

Sworn to and subscribed before me this 9th day of August, 2011.

SEAL

Marilyn Mares

Notary Public in and for the State of Texas



WHEREFORE, PREMISES CONSIDERED, the Texas Board of Nursing does hereby ratify and adopt the Agreed Order that was signed on the 9th day of August, 2011 , by BETTY JOYCE RICHARD, Vocational Nurse License Number 119092, and said Order is final.

Effective this 13th day of September, 2011.



Katherine A. Thomas
Katherine A. Thomas, MN, RN
Executive Director on behalf
of said Board



Texas Board of Nursing

333 Guadalupe Street, Ste. 3-460, Austin, Texas 78701
Phone: (512) 305-7400 Fax: (512) 305-7401 www.bon.state.tx.us

May 13, 2011

Katherine A. Thomas, MN, RN
Executive Director

Certified Mail No. 91 7199 9991 7030 3882 6290
Return Receipt Requested

Betty Joyce Richard
1324 N 62nd Street
Waco, Texas 76710

Dear Ms. Richard:

Enclosed are Formal Charges which have been filed against you alleging one or more violations of Section 301.452(b) of the Nursing Practice Act, Texas Occupations Code. Within three weeks of the date of this letter, you must file a written answer to each charge admitting or denying each allegation. If you intend to deny only part of an allegation, you must specify so much of it as is true and deny only the remainder. Your answer shall also include any other matter, whether of law or fact, upon which you intend to rely for your defense. Please send your written answer to the attention of Tamika Rose, Investigator. You may obtain legal counsel at your own expense.

FAILURE TO FILE A WRITTEN ANSWER TO THE FORMAL CHARGES, EITHER PERSONALLY OR BY LEGAL REPRESENTATIVE, WILL RESULT IN THE ALLEGATIONS CONTAINED IN THE FORMAL CHARGES BEING ADMITTED AS TRUE AND THE PROPOSED RECOMMENDATION OF STAFF WILL BE GRANTED BY DEFAULT.

Please be advised that should you fail to file a written answer, the case will proceed on a default basis and it will be staff's recommendation that a default order be entered revoking your license(s) and/or nurse licensure compact privilege(s) to practice nursing in the State of Texas.

The results of any default order or formal disposition (Board Order) are public information. Results of informal and formal dispositions will appear in the Board's newsletter under the heading of "Disciplinary Action."

Should you desire to discuss this matter, you may contact Tamika Rose, Investigator, Enforcement Division, at the above address, or at (512) 305-6812.

Sincerely,

Katherine A. Thomas, MN, RN
Executive Director

KAT/TR/

Enclosure: Formal Charges

09/99-DA

Members of the Board

Linda Rounds, PhD, FNP, RN
Galveston, *President*

Deborah Bell, CLU, ChFC Arlene	Kristin Benton, MSN, RN Austin	Patricia Clapp, BA Dallas	Tamara Cowen, MN, RN Harlingen	Sheri Crosby, JD, SPHR Dallas	Marilyn Davis, BSN, RN, MPA Sugar Land
Bianca Rosa Garcia, PhD, RN Corpus Christi	Richard Gibbs, LVN Mesquite	Kathy Leader-Horn, LVN Granbury	Josefina Lujan, PhD, RN El Paso	Beverly Jean Nutall, LVN Brvan	Mary Jane Salgado, MEd Eagle Pass

In the Matter of Permanent License § BEFORE THE TEXAS
Number 119092, Issued to §
BETTY JOYCE RICHARD, Respondent § BOARD OF NURSING

FORMAL CHARGES

This is a disciplinary proceeding under Section 301.452(b), Texas Occupations Code. Respondent, **BETTY JOYCE RICHARD**, a/k/a BETTY JOYCE PITRE is a Vocational Nurse holding license number 119092, which is in current status at the time of this pleading.

Written notice of the facts and conduct alleged to warrant adverse licensure action was sent to Respondent at Respondent's address of record and Respondent was given opportunity to show compliance with all requirements of the law for retention of the license prior to commencement of this proceeding.

CHARGE I.

On or about January 3, 1990, Respondent entered a plea of Guilty and was convicted of THEFT BY CHECK (a Misdemeanor offense committed on December 22, 1989), in the County Court at Law of Lee County, Texas, under Cause Number 10,809. As a result of the conviction, Respondent was ordered to pay a fine and court costs.

The above action constitutes grounds for disciplinary action in accordance with TEX. REV. CIV. STAT. ART. 4528c, Sec.10(a)(3)&(9)(effective 9/1/1985), and is a violation of 22 TEX. ADMIN. CODE §231.81(3)&(6)(effective 1/1/1985).

CHARGE II.

On or about May 16, 1990, Respondent entered a plea of Guilty to THEFT (a Class B Misdemeanor offense committed on April 2, 1989), in the County Court at Law No.1 of Williamson County, Texas, under Cause Number 27116. As a result of the plea, the proceedings against Respondent were deferred without entering an adjudication of guilt and Respondent was placed on probation for a period of eighteen (18) months. Additionally, Respondent was ordered to pay a fine and court costs.

The above action constitutes grounds for disciplinary action in accordance with TEX. REV. CIV. STAT. ART. 4528c, Sec.10(a)(3)&(9)(effective 9/1/1985), and is a violation of 22 TEX. ADMIN. CODE §231.81(6)(effective 1/1/1985).

CHARGE III.

On or about December 13, 1990, Respondent entered a plea of Guilty and was convicted of THEFT BY CHECK (a Misdemeanor offense committed on April 12, 1989), in the County Court at Law of Bastrop County, Texas, under Cause Number 20,519. As a result of the conviction, Respondent was sentenced to confinement in the Bastrop County Jail for a period of one hundred eighty (180) days; however, the imposition of sentence of confinement was suspended, and Respondent was placed on

probation for a period of hundred eighty (180) days. Additionally, Respondent was ordered to pay restitution in the amount three hundred eighty-nine (\$389) dollars, a fine, and court costs.

On or about July 21, 1994, Respondent's probation granted under Cause Number 20,519 was revoked, and Respondent was sentenced to confinement in the Bastrop County Jail for a period of ninety (90) days, with twenty-two (22) days credit given.

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CHARGE IV.

On or about July 17, 1991, Respondent entered a plea of Guilty and was convicted of THEFT BY CHECK (a Misdemeanor offense committed on August 2, 1990), in the County Court of Lee County, Texas, under Cause Number 10,902. As a result of the conviction, Respondent was ordered to pay a fine and court costs.

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CHARGE V.

On or about October 27, 1993, Respondent entered a plea of Guilty and was convicted of FAIL TO MAINTAIN FINANCIAL RESPONSIBILITY (a Class B Misdemeanor offense committed on August 12, 1993), in the County Court at Law No. 1 of Williamson County, Texas, under Cause Number 93-40098-1. As a result of the conviction, Respondent was ordered to pay a fine and court costs. On or about October 27, 1993, Respondent was charged with FAIL TO ID AS WITNESS, under Cause Number 93-40097-I. Cause Number 93-40097-I was taken into consideration during the sentencing phase of Cause Number 93-40098-I.

The above action constitutes grounds for disciplinary action in accordance with TEX. REV. CIV. STAT. ART. 4528c, Sec.10(a)(3)&(9)(effective 9/1/1985), and is a violation of 22 TEX. ADMIN. CODE §239.11(22)(effective 1/1/1993).

CHARGE VI.

On or about October 27, 1993, Respondent probation granted under Cause Number 27,116, for the offense of THEFT was revoked. As a result of the revocation, Respondent was adjudged Guilty of the Class B Misdemeanor offense of THEFT committed on April 2, 1989. Furthermore, Respondent was sentenced to confinement in the Williamson County Jail for a period of six (6) months; however, the imposition of sentence of confinement was suspended, and Respondent was placed on probation for a period of twenty-four (24) months. Additionally Respondent was ordered to pay restitution in the amount of two thousand, one hundred sixteen and ninety-four (\$2116.94) dollars, a fine, and court costs.

On or about September 16, 1994, Respondent's probation granted under Cause Number 27,116 was revoked, and Respondent was sentenced to confinement in the Williamson County Jail for a period of sixty (60) days, with three (3) days credit given. Additionally, Respondent was ordered to pay a fine and court costs.

The above action constitutes grounds for disciplinary action in accordance with TEX. REV. CIV. STAT. ART. 4528c, Sec.10(a)(3)&(9)(effective 9/1/1993), and is a violation of 22 TEX. ADMIN. CODE §239.11(22)(B)(effective 1/1/1993).

CHARGE VII.

On or about April 7, 1994, Respondent entered a plea of Guilty and was convicted of 3 COUNTS OF FORGERY (a 3rd Degree Felony offense committed on July 20, 1992 and August 14, 1992), in the 21st district court of Burleson County, Texas, under Cause Number 11,049. As a result of the conviction, Respondent was sentenced to confinement in the Texas Department of Criminal Justice Institutional Division for a period of ten (10) years; however, the imposition of sentence of confinement was suspended, and Respondent was placed on probation for a period of ten (10) years. Additionally, Respondent was ordered to pay a restitution in the amount of one hundred seventy-seven and ninety-five (\$177.95) dollars, a fine, and court costs.

The above action constitutes grounds for disciplinary action in accordance with TEX. REV. CIV. STAT. ART. 4528c, Sec.10(a)(3)&(9)(effective 9/1/1993), and is a violation of 22 TEX. ADMIN. CODE §239.11(22)(A)(effective 9/1/1993).

CHARGE VIII.

On or about August 13, 1998, Respondent entered a plea of Guilty and was convicted of THEFT BY CHECK (a Class B Misdemeanor offense committed on August 1, 1997), in the County Court at Law of McLennan County, Texas, under Cause Number 98-2110CR2. As a result of the conviction, Respondent was sentenced to confinement in the McLennan County Jail for a period of one hundred and eighty (180) days. Additionally, Respondent was ordered to pay a fine and court costs.

The above action constitutes grounds for disciplinary action in accordance with TEX. REV. CIV. STAT. ART. 4528c, Sec.10(a)(3)&(9)(effective 9/1/1997), and is a violation of 22 TEX. ADMIN. CODE §239.11(29)(A)(effective 3/1/1998).

NOTICE IS GIVEN that staff will present evidence in support of the recommended disposition of up to revocation of Respondent's license to practice nursing in the State of Texas pursuant to the Nursing Practice Act, Chapter 301, Texas Occupations Code and the Board's rules, 22 Tex. Admin. Code §§ 213.27 - 213.33. Additionally, staff will seek to impose on Respondent the administrative costs of the proceeding pursuant to Section 301.461, Texas Occupations Code. The cost of proceedings shall include, but is not limited to, the cost paid by the Board to the State Office of Administrative Hearings and the Office of the Attorney General or other Board counsel for legal and investigative services, the cost of a court reporter and witnesses, reproduction of records, Board staff time, travel, and expenses. These shall be in an amount of at least one thousand two hundred dollars (\$1200.00).

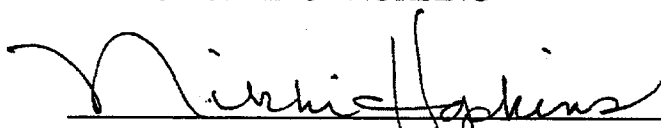
NOTICE IS GIVEN that all statutes and rules cited in these Charges are incorporated as part of this pleading and can be found at the Board's website, www.bon.state.tx.us.

NOTICE IS GIVEN that to the extent applicable, based on the Formal Charges, the Board will rely on Adopted Disciplinary Guidelines for Criminal Conduct and on Adopted Disciplinary Sanction Policies for Fraud, Theft & Deception, which can be found at the Board's website, www.bon.state.tx.us.

NOTICE IS GIVEN that, based on the Formal Charges, the Board will rely on the Disciplinary Matrix, which can be found at www.bon.state.tx.us/disciplinaryaction/discp-matrix.html.

Filed this 13th day of May, 2011.

TEXAS BOARD OF NURSING



James W. Johnston, General Counsel
Board Certified - Administrative Law
Texas Board of Legal Specialization
State Bar No. 10838300

Jena Abel, Assistant General Counsel
State Bar No. 24036103

Lance Robert Brenton, Assistant General Counsel
State Bar No. 24066924

Robert Kyle Hensley, Assistant General Counsel
State Bar No. 50511847

Nikki Hopkins, Assistant General Counsel
State Bar No. 24052269

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TEXAS BOARD OF NURSING

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