



7. On or about March 8, 2009, Respondent submitted an online renewal document to the Texas Board of Nursing in which she provided false, deceptive, and/or misleading information, in that she answered "no" to the following question:

"Has any licensing authority refused to issue you a license or ever revoked, annulled, cancelled, accepted surrender of, suspended, placed on probation, refused to renew a nursing license, certificate or multi-state privilege held by you now or previously, or ever fined, censured, reprimanded or otherwise disciplined you?"

Respondent failed to disclose that on October 22, 2004, her license to practice vocational nursing in the state of California was issued a revocation order. The Revocation was stayed and her license was placed on probation for three (3) years. A copy of the California Order is attached and incorporated as part of this Order.

#### 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 violation of Section 301.452(b)(2),(8)&(10), Texas Occupations Code, and 22 TEX. ADMIN. CODE §217.12(6)(H)&(I).
4. The evidence received is sufficient cause pursuant to Section 301.452(b), Texas Occupations Code, to take disciplinary action against Vocational License Number 180436, heretofore issued to LATASHAU DIANNE THOMAS, 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 Vocational Nurse License Number 180436, previously issued to LATASHAU DIANNE THOMAS, to practice vocational nursing in Texas is hereby SUSPENDED for a period of two (2) years with the suspension STAYED and Respondent is hereby placed on PROBATION for two (2) years with the following agreed terms of probation:

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 the 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.

(1) 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.

(2) 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>.

(3) RESPONDENT SHALL, within one (1) year of entry of this Order, successfully complete a course in medication administration. 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. The didactic portion of this course shall be a minimum of six (6) hours in length. The course shall contain a minimum twenty-four (24) hour clinical component which is to be provided by the same Registered Nurse who provides the didactic portion of this course. The clinical component SHALL focus on tasks of medication administration only. The clinical component SHALL focus on tasks of medication administration only. In order for the course to be approved, the course's content shall include: a review of proper administration procedures for all standard routes; computation of drug dosages; the five (5) rights of medication administration; factors influencing the choice of route; and possible adverse effects resulting from improper administration. The course description shall indicate goals and objectives for the course, resources to be utilized, and the methods to be used to determine successful completion of the course. RESPONDENT SHALL successfully complete both the didactic and clinical portions of the course to satisfy this stipulation. RESPONDENT SHALL CAUSE the instructor 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>.*

(4) RESPONDENT SHALL, within one (1) year of entry of this Order, successfully complete a course in nursing documentation. 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. The course shall be a minimum of six (6) hours in length of classroom time. In order for the course to be approved, the target audience shall include Nurses. The course shall include content on the following: nursing standards related to accurate and complete documentation; legal guidelines for recording; methods and processes of recording; methods of alternative record-keeping; and computerized documentation. RESPONDENT SHALL cause the instructor to submit a Verification of Course Completion form, provided by the Board, to the Board's office 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>.*

(5) 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. *Board-approved courses may be found at the following Board website address: <http://www.bon.texas.gov/disciplinaryaction/stipscourses.html>.*

(6) RESPONDENT SHALL pay a monetary fine in the amount two hundred fifty dollars (\$250). RESPONDENT SHALL pay this fine within forty-five (45) days of entry of this Order. Payment is to be made directly to the Texas Board of Nursing in the form of cashier's check or U.S. money order. Partial payments will not be accepted.

**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 PROBATION CONDITIONS FOR TWO (2) YEAR(S) OF EMPLOYMENT. THE LENGTH OF THE PROBATIONARY PERIOD WILL BE EXTENDED UNTIL SUCH TWENTY-FOUR (24) 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:**

(7) RESPONDENT SHALL notify each present employer in nursing of this Order of the Board and probation 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 probation 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.

(8) 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.

(9) For the first year of employment as a Nurse under this Order, RESPONDENT SHALL be directly 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. Direct supervision requires another nurse, as applicable, to be working on the same unit as RESPONDENT and immediately available to provide assistance and intervention. RESPONDENT SHALL work only on regularly assigned, identified and predetermined unit(s). The 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.

(10) For the remainder of the stipulation/probation period, 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.

(11) 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 two (2) year(s) of employment as a nurse.

IT IS FURTHER AGREED and ORDERED that if during the period of probation, an additional allegation, accusation, or petition is reported or filed against the Respondent's license(s), the probationary period shall not expire and shall automatically be extended until the allegation, accusation, or petition has been acted upon by the Board.

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 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 2 day of March, 2012.

[Signature]

LATASHAU DIANNE THOMAS, Respondent

Sworn to and subscribed before me this 2 day of March, 2012.

SEAL

[Signature]

Notary Public in and for the State of Texas



Approved as to form and substance.

[Signature]

Taralynn R. Mackay, Attorney for Respondent

Signed this 8<sup>th</sup> day of March, 2012.

WHEREFORE, PREMISES CONSIDERED, the Texas Board of Nursing does hereby ratify and adopt the Agreed Order that was signed on the 2nd day of March, 2012, by LATASHAU DIANNE THOMAS, Vocational Nurse License Number 180436, and said Order is final.

Effective this 19th day of April, 2012.

A handwritten signature in black ink, appearing to read "Katherine A. Thomas".

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

1 BILL LOCKYER, Attorney General  
of the State of California  
2 LISA S. WIGGINS, State Bar No. 168399  
Deputy Attorney General  
3 California Department of Justice  
455 Golden Gate Avenue, Suite 11000  
4 San Francisco, CA 94102-7004  
Telephone: (415) 703-5652  
5 Facsimile: (415) 703-5480

6 Attorneys for Complainant

7  
8 **BEFORE THE**  
9 **BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

13 **LATASHAU DIANE THOMAS**  
12261 Fondren Road  
14 Apartment 1909  
Houston, Texas 77035

15 Vocational Nurse License No. VN 187698

16 Respondent.

Case No. 6641

OAH No. N2004040646

17 **STIPULATED SETTLEMENT AND**  
18 **DISCIPLINARY ORDER**

19 **IT IS HEREBY STIPULATED AND AGREED** by and between the parties to  
20 the above-entitled proceedings that the following matters are true:

21 **PARTIES**

22 1. Teresa Bello-Jones, J.D., M.S.N., R.N. ("Complainant") is the Executive  
23 Officer of the Board of Vocational Nursing and Psychiatric Technicians ("Board"), Department of  
24 Consumer Affairs. She brought this action solely in her official capacity and is represented in this  
25 matter by Bill Lockyer, Attorney General of the State of California, by Lisa S. Wiggins, Deputy  
26 Attorney General.

27 2. Latashau Diane Thomas ("Respondent") is representing herself in this  
28 proceeding and has chosen not to exercise her right to be represented by counsel.





1                   2.     **Compliance With Probation Program And Quarterly Report**  
2 **Requirements.** Respondent shall fully comply with terms and conditions of the probation  
3 established by the Board and shall cooperate with the representatives of the Board in its monitoring  
4 and investigation of the Respondent's compliance with the Probation Program.

5                   Respondent shall submit quarterly reports, under penalty of perjury, in a form required  
6 by the Board. The reports shall certify and document compliance with all the conditions of  
7 probation.

8                   3.     **Notification of Address And Telephone Number Change(s).** Respondent  
9 shall notify the Board, in writing, within five (5) days of a change of residence or mailing address,  
10 of her new address and any change in her work and/or home telephone numbers.

11                  4.     **Notification of Residency or Practice Outside of State.** Respondent shall  
12 notify the Board, in writing, within five (5) days, if she leaves California to reside or practice in  
13 another state.

14                  Respondent shall notify the Board, in writing, within five (5) days, upon her return  
15 to California.

16                  The period of probation shall not run during the time Respondent is residing or  
17 practicing outside California.

18                  5.     **Notification to Employer(s).** When currently employed or applying for  
19 employment in any capacity in any health care profession, Respondent shall notify her employer of  
20 the probationary status of Respondent's license. This notification to the Respondent's current health  
21 care employer shall occur no later than the effective date of the Decision. Respondent shall notify  
22 any prospective health care employer of her probationary status with the Board prior to accepting  
23 such employment. This notification shall be by providing the employer or prospective employer  
24 with a copy of the Board's Accusation and Disciplinary Decision.

25                  The Health Care Profession includes, but is not limited to: Licensed Vocational  
26 Nurse, Psychiatric Technician, Registered Nurse, Medical Assistant, Paramedic, Emergency Medical  
27 Technician, Certified Nursing Assistant, Home Health Aide, and all other ancillary technical health  
28 care positions.

1 Respondent shall cause each health care employer to submit quarterly reports to the  
2 Board. The reports shall be on a form provided by the Board, shall include a performance evaluation  
3 and such other information as may be required by the Board.

4 Respondent shall notify the Board, in writing, within five (5) days of any change in  
5 employment status. Respondent shall notify the Board, in writing, if she is terminated from any  
6 nursing or health care related employment with a full explanation of the circumstances surrounding  
7 the termination.

8 **6. Interviews/meetings With Board Representative(s).** Respondent, during  
9 the period of probation, shall appear in person at interviews/meetings as directed by the Board, or  
10 its designated representatives.

11 **7. Employment Requirements and Limitations.** During probation,  
12 Respondent shall work in her licensed capacity in the State of California. This practice shall consist  
13 of no less than six (6) continuous months and of no less than twenty (20) hours per week.

14 While on probation, Respondent shall not work for a nurses' registry or in any private  
15 duty position, a temporary nurse placement agency, as a faculty member in an accredited or approved  
16 school of nursing, or as an instructor in a Board approved continuing education course except as  
17 approved, in writing, by the Board. Respondent shall work only on a regularly assigned, identified  
18 and predetermined work site(s) and shall not work in a float capacity except as approved, in writing,  
19 by the Board.

20 **8. Supervision Requirements.** Respondent shall obtain prior approval from  
21 the Board, before commencing any employment, regarding the level of supervision provided to  
22 Respondent while employed as a licensed vocational nurse or psychiatric technician.

23 Respondent shall not function as a charge nurse (i.e., work in any healthcare setting  
24 as the person who oversees or directs licensed vocational nurses, psychiatric technicians, certified  
25 nursing assistants or unlicensed assistive personnel) or supervising psychiatric technician during the  
26 period of probation except as approved, in writing, by the Board.

27 **9. Completion of Educational Course(s).** Respondent, at her own expense,  
28 shall enroll and successfully complete a course(s) substantially related to the violation(s) no later

1 than the end of the first year of probation; or Respondent shall be suspended from practice. until she  
2 has enrolled in and has successfully completed the specified coursework.

3           The coursework shall be in addition to that required for license renewal. The Board  
4 shall notify Respondent of the course content and number of contact hours required. Within thirty  
5 (30) days of the Board's written notification of assigned coursework, Respondent shall submit a  
6 written plan to comply with this requirement. The Board shall approve such plan prior to enrollment  
7 in any course of study.

8           Upon successful completion of the course, Respondent shall cause the instructor to  
9 furnish proof to the Board within thirty (30) days of course completion.

10           **10. Maintenance of Valid License.** Respondent shall, at all times while on  
11 probation, maintain an active current license with the Board, including any period during which  
12 suspension or probation is tolled.

13           Should Respondent's license, by operation of law or otherwise, expire, upon renewal  
14 or reinstatement Respondent's license shall be subject to any and all terms of this probation not  
15 previously satisfied.

16           **11. Cost Recovery Requirements.** Respondent shall pay to the Board costs  
17 associated with its investigation and enforcement pursuant to Business and Professions Code section  
18 125.3 in the amount of \$4,200.00. Respondent shall be permitted to pay these costs in a payment  
19 plan approved by the Board, with payments to be completed no later than three months prior to the  
20 end of the probation term.

21           The Board may conditionally renew or reinstate, for a maximum of one year, the  
22 license of any Respondent who demonstrates financial hardship. Respondent shall enter into a  
23 formal agreement with the Board to reimburse the unpaid costs within that one year period.

24           Except as provided above, the Board shall not renew or reinstate the license of any  
25 Respondent who has failed to pay all the costs as directed in a Decision.

26           **12. Violation of Probation.** If Respondent violates the conditions of her  
27 probation, the Board after giving Respondent notice and an opportunity to be heard, may set aside  
28 the stay order and impose the stayed discipline (revocation) of the Respondent's license. If during





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ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board of Vocational Nursing and Psychiatric Technicians of the Department of Consumer Affairs.

DATED: July 13, 2004

BILL LOCKYER, Attorney General  
of the State of California



\_\_\_\_\_  
LISA S. WIGGINS  
Deputy Attorney General

Attorneys for Complainant

**DECISION AND ORDER  
OF THE BOARD OF VOCATIONAL NURSING  
AND PSYCHIATRIC TECHNICIANS**

The foregoing Stipulation in Settlement, in Case No. 6641, is hereby adopted as the Order of the Board of Vocational Nursing and Psychiatric Technicians for the State of California on this 22<sup>nd</sup> day of September, 2004. This Decision and Order shall become effective on the 22<sup>nd</sup> day of October, 2004.

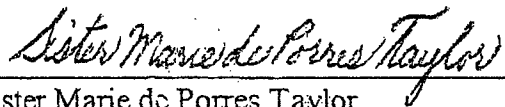
  
Sister Marie de Porres Taylor  
President

Exhibit A  
Accusation No. 6641

1 BILL LOCKYER, Attorney General  
of the State of California  
2 LISA S. WIGGINS, State Bar No. 168399  
Deputy Attorney General  
3 California Department of Justice  
455 Golden Gate Avenue, Suite 11000  
4 San Francisco, CA 94102-7004  
Telephone: (415) 703-5652  
5 Facsimile: (415) 703-5480

6 Attorneys for Complainant

7  
8 **BEFORE THE**  
9 **BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 6641

13 **LATASHAU THOMAS**  
14 **a.k.a. LATASHAU DIANNE THOMAS**  
12261 Fondren Road  
Apartment 1909  
Houston, Texas 77035

**ACCUSATION**

15 Vocational Nurse License No. VN 187698

16 Respondent.

17  
18 Complainant alleges:

19 **PARTIES**

20 1. Teresa Bello-Jones, J.D., M.S.N., R.N. ("Complainant") brings this  
21 Accusation solely in her official capacity as the Executive Officer of the Board of Vocational  
22 Nursing and Psychiatric Technicians, Department of Consumer Affairs.

23 2. On or about March 23, 1999, the Board of Vocational Nursing and Psychiatric  
24 Technicians issued Vocational Nurse License Number VN 187698 to Latashau Thomas, a.k.a.  
25 Latashau Diane Thomas, ("Respondent"): The Vocational Nurse License expired on May 31, 2002,  
26 and has not been renewed.

27 **JURISDICTION**

28 3. This Accusation is brought before the Board of Vocational Nursing and



1 9. Title 16 of the California Code of Regulations section 2519 states:

2 "As set forth in Section 2878 of the Code, gross negligence is deemed unprofessional  
3 conduct and is a ground for disciplinary action. As used in Section 2878 'gross negligence' means  
4 a substantial departure from the standard of care which, under similar circumstances, would have  
5 ordinarily been exercised by a competent licensed vocational nurse, and which has or could have  
6 resulted in harm to the consumer. An exercise of so slight a degree of care as to justify the belief that  
7 there was a conscious disregard or indifference for the health, safety, or welfare of the consumer  
8 shall be considered a substantial departure from the above standard of care."

9 10. Business and Professions Code section 125.3 provides, in pertinent part, that  
10 the Board may request the administrative law judge to direct a licentiate found to have committed  
11 a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the  
12 investigation and enforcement of the case.

13 **FIRST CAUSE FOR DISCIPLINE**

14 (Unprofessional Conduct)

15 11. Respondent is subject to disciplinary action under Business and Professions  
16 Code section 2878(a) and California Code of Regulations, title 16, section 2518.6 (a) in that, while  
17 working as a licensed vocational nurse at Contra Costa Regional Medical Center in Martinez,  
18 California, ("CCRMC") Respondent failed to safeguard her patient's/client's health and safety. The  
19 circumstances are that, during the two weeks Respondent was employed at CCRMC, the following  
20 occurred:

21 a. Respondent reported to work late on three occasions:

22 (1) On or about September 13, 2000 - 30 minutes late;

23 (2) On or about September 14, 2000 - 40 minutes late; and

24 (3) On or about October 26, 2000 - 30 minutes late.

25 b. On or about September 26, 2000, Respondent took a 55 minute break  
26 from her shift, when her break allowance is 30 minutes;

27 c. Respondent fell asleep during shift reports, and failed to write down  
28 relevant data on her patients;

1 d. Respondent failed to respond to call lights of patients under her care;

2 e. Respondent made the following documentation errors in Patient DC's

3 chart:

4 (1) Respondent failed to document that the patient had edema;

5 (2) Respondent documented that the patient had an IV in the  
6 wrist, when the IV was in the right groin; and

7 (3) Respondent documented the male patient had vaginal  
8 discharge.

9 **SECOND CAUSE FOR DISCIPLINE**

10 (Gross Negligence)

11 12. Respondent is subject to disciplinary action under Business and Professions  
12 Code section 2878(a)(1) in that was grossly negligent in her care of a patient at CCRMC. The  
13 circumstances are that on or about October 26, 2000, Respondent erroneously gave Patient WF, who  
14 had a partial colectomy on or about October 24, 2000, two enemas that had been ordered for the  
15 patient in the next bed. There was no order for an enema to be given to Patient WF.

16 **PRAYER**

17 WHEREFORE, Complainant requests that a hearing be held on the matters herein  
18 alleged, and that following the hearing, the Board of Vocational Nursing and Psychiatric Technicians  
19 issue a decision:

20 1. Revoking or suspending Vocational Nurse License Number VN 187698,  
21 issued to Latashau Thomas, a.k.a. Latashau Diane Thomas;

22 2. Ordering Latashau Thomas, a.k.a. Latashau Diane Thomas, to pay the Board  
23 of Vocational Nursing and Psychiatric Technicians the reasonable costs of the investigation and  
24 enforcement of this case, pursuant to Business and Professions Code section 125.3;

25 ///

26 ///

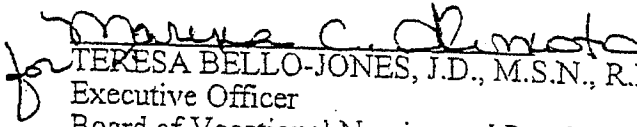
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3. Taking such other and further action as deemed necessary and proper.

DATED: March 29, 2004.

*for*   
TERESA BELLO-JONES, J.D., M.S.N., R.N.  
Executive Officer  
Board of Vocational Nursing and Psychiatric Technicians  
Department of Consumer Affairs  
State of California  
Complainant

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