

IN THE MATTER OF PERMANENT §  
REGISTERED NURSE LICENSE §  
NUMBER 658308 ISSUED TO §  
JENNIFER LYNN AMOS §

BEFORE THE TEXAS  
BOARD OF NURSING  
ELIGIBILITY AND  
DISCIPLINARY COMMITTEE



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.  
*Patricia A. Plummer*  
Executive Director of the Board

**ORDER OF THE BOARD**

TO: Jennifer Lynn Amos  
350 Old Street, Rt 3  
Columbia, IL 62236

During open meeting held in Austin, Texas, on **August 6, 2013**, the Texas Board of Nursing Eligibility and Disciplinary Committee (hereinafter "Committee") heard the above-styled case, based on the failure of the Respondent to appear as required by 22 TEX. ADMIN. CODE Ch. 213.

The Committee finds that notice of the facts or conduct alleged to warrant disciplinary action has been provided to Respondent in accordance with Texas Government Code § 2001.054(c) and Respondent has been given an opportunity to show compliance with all the requirements of the Nursing Practice Act, Chapter 301 of the Texas Occupations Code, for retention of Respondent's license(s) to practice nursing in the State of Texas.

The Committee finds that the Formal Charges were properly initiated and filed in accordance with section 301.458, Texas Occupations Code.

The Committee finds that after proper and timely Notice regarding the violations alleged in the Formal Charges was given to Respondent in this matter, Respondent has failed to appear in accordance with 22 TEX. ADMIN. CODE Ch. 213.

The Committee finds that the Board is authorized to enter a default order pursuant to Texas Government Code § 2001.056.

The Committee, after review and due consideration, adopts the proposed findings of fact and conclusions of law as stated in the Formal Charges which are attached hereto and incorporated by reference for all purposes and the Staff's recommended sanction of revocation by default. This Order

will be properly served on all parties and all parties will be given an opportunity to file a motion for rehearing [22 TEX. ADMIN.CODE § 213.16(j)]. All parties have a right to judicial review of this Order.

All proposed findings of fact and conclusions of law filed by any party not specifically adopted herein are hereby denied.

NOW, THEREFORE, IT IS ORDERED that Permanent Registered Nurse License Number 658308, previously issued to JENNIFER LYNN AMOS, to practice nursing in the State of Texas be, and the same is/are hereby, REVOKED.

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

Entered this 6th day of August, 2013.

TEXAS BOARD OF NURSING

BY:



\_\_\_\_\_  
KATHERINE A. THOMAS, MN, RN, FAAN  
EXECUTIVE DIRECTOR ON BEHALF OF SAID BOARD

Attachment: Formal Charge filed June 24, 2013.

Re: Permanent Registered Nurse License Number 658308  
Issued to JENNIFER LYNN AMOS  
DEFAULT ORDER - REVOKE

CERTIFICATE OF SERVICE

I hereby certify that on the 9<sup>th</sup> day of August, 2013, a true and correct copy of the foregoing  
DEFAULT ORDER was served and addressed to the following person(s), as follows:

Via USPS Certified Mail, Return Receipt Requested

Jennifer Lynn Amos  
350 Old Street, Rt 3  
Columbia, IL 62236

Via USPS First Class Mail

Jennifer Lynn (Amos) Wright  
5715 Winding Path  
Waterloo, Illinois 62298

BY:



KATHERINE A. THOMAS, MN, RN, FAAN  
EXECUTIVE DIRECTOR ON BEHALF OF SAID BOARD

In the Matter of Permanent § BEFORE THE TEXAS  
Registered Nurse License §  
Number 658308 Issued to §  
JENNIFER LYNN AMOS, §  
Respondent § BOARD OF NURSING

### FORMAL CHARGES

This is a disciplinary proceeding under Section 301.452(b), Texas Occupations Code. Respondent, JENNIFER LYNN AMOS, is a Registered Nurse holding License Number 658308 which is in delinquent 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 November 24, 2008, Respondent received a Consent Order from the Illinois Board of Nursing wherein Respondent's license to practice professional nursing in the State of Illinois was placed on Definite Suspension for a period of three (3) months then immediately placed on Indefinite Probation for a minimum of three (3) years with terms and conditions to include but not limited to required drug testing. Subsequently, on or about July 6, 2012, Respondent received an Order from the Illinois Board of Nursing wherein Respondent's license to practice professional nursing in the State of Illinois was Indefinitely Suspended for failure to comply with the Consent Order issued by the Illinois Board of Nursing dated, November 24, 2008. Copies of the Consent Order issued by the Illinois Board of Nursing, dated November 24, 2008 and Order issued by the Illinois Board of Nursing, dated July 6, 2012, are attached and incorporated by reference as part of this charge.

The above action constitutes grounds for disciplinary action in accordance with Section 301.452(b)(8), Texas Occupations Code.

NOTICE IS GIVEN that staff will present evidence in support of the recommended disposition of up to, and including, revocation of Respondent's license/s 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.texas.gov](http://www.bon.texas.gov).

NOTICE IS GIVEN that to the extent applicable, based on the Formal Charges, the Board will rely on Adopted Disciplinary Sanction Policies for Nurses with Substance Abuse, Misuse, Substance Dependency, or other Substance Use Disorder, which can be found at the Board's website, [www.bon.texas.gov](http://www.bon.texas.gov).

NOTICE IS GIVEN that, based on the Formal Charges, the Board will rely on the Disciplinary Matrix, which can be found at [www.bon.texas.gov/disciplinaryaction/discp-matrix.html](http://www.bon.texas.gov/disciplinaryaction/discp-matrix.html).

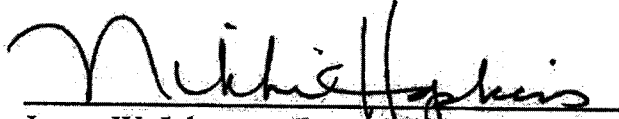
NOTICE IS ALSO GIVEN that Respondent's past disciplinary history, as set out below and described in the Order(s) which are attached and incorporated by reference as part of these charges, will be offered in support of the disposition recommended by staff: Consent Order issued by the Illinois Board of Nursing, dated November 24, 2008 and Order issued by the Illinois Board of Nursing, dated July 6, 2012.

BALANCE OF THIS PAGE INTENTIONALLY LEFT BLANK.

CONTINUED ON NEXT PAGE.

Filed this 24<sup>th</sup> day of June, 2013.

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

John R. Griffith, Assistant General Counsel

State Bar No. 24079751

Robert Kyle Hensley, Assistant General Counsel

State Bar No. 50511847

Nikki Hopkins, Assistant General Counsel

State Bar No. 24052269

John F. Legris, Assistant General Counsel

State Bar No. 00785533

TEXAS BOARD OF NURSING

333 Guadalupe, Tower III, Suite 460

Austin, Texas 78701

P: (512) 305-6811

F: (512) 305-8101 or (512)305-7401

Attachments: Consent Order issued by the Illinois Board of Nursing, dated November 24, 2008 and Order issued by the Illinois Board of Nursing, dated July 6, 2012.

D/2012.06.19



**Illinois Department of Financial and Professional Regulation**  
**Division of Professional Regulation**

Pat Quinn  
 Governor

Brent E. Adams  
 Secretary

Jay Stewart  
 Director  
 Division of Professional Regulation

**CERTIFICATION OF LICENSURE**


Texas Board of Nursing  
 Attn: Bonnie Krznarich  
 Enforcement Division  
 333 Guadalupe St Ste 3-460  
 Austin TX 78701

Licensee: Jennifer Lynn Wright  
 License Number: 041.290256  
 Profession: Registered Professional Nurse  
 Date of Issuance: 08/04/1995  
 Expiration Date: 05/31/2010  
 License Status: Suspended  
 License Method: Examination  
 Disciplinary History: HAS been disciplined

**\*DISCIPLINARY DOCUMENTS ATTACHED.**

This document is a certified copy of the records maintained and kept by this Department in the regular course of business as of today's date.



  
 #11

Jay Stewart  
 Director  
 Division of Professional Regulation

July 18, 2012  
 Date

Refer to the Department's Web Site at [www.idfpr.com](http://www.idfpr.com) to verify professional licenses via License Look-Up.



Illinois Department of Financial and Professional Regulation  
Division of Professional Regulation

PAT QUINN  
Governor

BRENT E. ADAMS  
Secretary

JAY STEWART  
Director  
Division of Professional Regulation

CERTIFICATION

I, Jay Stewart, Director of the Division of Professional Regulation, do hereby certify that I have been designated by the Secretary of the Department of Financial and Professional Regulation of the State of Illinois, as the keeper of its records and Seal. Such document(s) attached hereto are certified copies of the records maintained and kept by this Department in the regular course of business as of today's date.

IN WITNESS WHEREOF, I have set my hand and Seal of the Department of Financial and Professional Regulation at Springfield, Sangamon County, Illinois,

this 18<sup>th</sup> day of July 2012.

\_\_\_\_\_  
#11  
Jay Stewart, Director

Division of Professional Regulation





STATE OF ILLINOIS  
DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION  
DIVISION OF PROFESSIONAL REGULATION

DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION	)	
DIVISION OF PROFESSIONAL REGULATION	)	
of the State of Illinois,	)	
v.	)	No. 200800016
JENNIFER LYNN WRIGHT	)	
License No. 041290256,	)	
Complainant	)	
Respondent	)	

ORDER

This matter having come before the Director of the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois, Division of Professional Regulation, [hereinafter referred to as the "Department"], for the Suspension of Certificate of Registration as a Registered Nurse of JENNIFER LYNN WRIGHT , License No. 041290256;

NOW, THEREFORE I, JAY STEWART, Director of the Department, after reviewing this matter and the documents attached herein, do hereby FIND:

1. That I have jurisdiction of the parties and the subject matter herein.
2. That on or about November 24, 2008, a Consent Order was approved by the Director of the Department which Suspended Respondent's license for a definite period of three months and then placed Respondent's license on Indefinite Probation for a minimum period of three years. A copy of the Consent Order is attached hereto and incorporated herein as "Exhibit A."

3. Paragraph A(1) of the Consent Order set forth that Respondent "...shall not ingest alcohol."
4. Paragraph A(2) of the Consent Order set forth that Respondent "...shall not ingest mood or mind altering substances except those therapeutically prescribed by treating prescriber whose patient records reflect that the treating prescriber knew of Respondent's disease and ongoing recovery."
5. Paragraph A(3) of the Consent Order set forth that Respondent "...shall provide monthly random urine screens during the Probationary period. Failure, refusal to give the screens or a positive result shall be a violation of Probation."
6. The terms of the Consent Order provided in paragraph A(4)(g) for the automatic, indefinite and immediate suspension of Respondent's license to practice as a Registered Nurse for a minimum period of twelve months for any violation of paragraphs A(1),A(2) or A(3) of the Consent Order.
7. Respondent violated paragraph A(3) of the Consent Order by calling the notification line on March 29, 2012, being selected to test and failing to submit a requested screen.
8. Respondent violated paragraph A(3) of the Consent Order by calling the notification line on April 19, 2012, being selected to test and failing to submit a requested screen.

9. Respondent violated paragraph A(3) of the Consent Order by calling the notification line on April 26, 2012, being selected to test and failing to submit a requested screen.
10. Refer to Affidavit from Elizabeth Chillon, Acting Chief of the Probation Investigations Unit of the Department, attached hereto and incorporated herein as "Exhibit B."

IT IS THEREFORE ORDERED that the Certificate of Registration, license No. 041290256, heretofore issued to JENNIFER LYNN WRIGHT, to practice as a Registered Nurse in the State of Illinois is hereby Indefinitely Suspended for at least twelve months from the date of this Order.

IT IS FURTHER ORDERED that JENNIFER LYNN WRIGHT immediately surrender said Certificate of Registration and all other indicia of licensure to the Department.

DATED THIS 16<sup>th</sup> day of July, 2012.

DEPARTMENT OF FINANCIAL AND  
PROFESSIONAL REGULATION,  
of the State of Illinois ; BRENT E. ADAMS, SECRETARY  
DIVISION OF PROFESSIONAL  
REGULATION

  
\_\_\_\_\_  
JAY STEWART  
Director

REF:  
JENNIFER LYNN WRIGHT  
License No. 041290256  
Case No. 200800016

STATE OF ILLINOIS  
DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION  
DIVISION OF PROFESSIONAL REGULATION

DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois,		)	
	Complainant	)	No. 200800016
v.		)	
JENNIFER L. WRIGHT		)	
License No. 041290256	Respondent	)	

CONSENT ORDER

The Department of Financial and Professional Regulation, Division of Professional Regulation by Jennifer E. Kirchner, Senior Law Student, as supervised by Gertrude M. Kelly, Chief of Health Related Prosecutions, and Jennifer L. Wright, Respondent, hereby agree to the following:

STIPULATIONS

Jennifer L. Wright is licensed as a Registered Professional Nurse in the State of Illinois, holding license No. 041290256, which is currently in active status. At all times material to the matter set forth in this Consent Order, the Department of Financial and Professional Regulation of the State of Illinois, Division of Professional Regulation has jurisdiction over the subject matter and parties herein.

The Department has received information that on or about December 15, 2007, the Respondent refused to submit to a drug screen after two doses of Stadol she removed could not be accounted for while employed per a back-to-work agreement entered into with St. Elizabeth's Hospital in Belleville, Illinois. The Respondent was originally placed on a back-to-work agreement on or about April 12, 2007, after admitting to diverting Stadol and Nubain from St. Elizabeth's Hospital and after testing positive in a subsequent drug screening. The Department has also received information that on or about June 20, 2008, the Respondent was terminated from Memorial Hospital in Belleville, Illinois, after violating a back-to-work agreement by failing to schedule counseling sessions.

The allegation(s) as set forth herein, if proven to be true would constitute

suspending or revoking Respondent's license as a Registered Professional nurse on the authority of 225 Illinois Compiled Statutes 65/70-5(b)(4); (b)(7); (b)(8); (b)(9) and (b)(33).

Respondent has been advised of the right to a hearing, the right to contest any charges brought, and the right to administrative review of any Order resulting from a hearing. Respondent knowingly waives each of these rights, as well as any right to administrative review of this Consent Order.

Respondent and the Department have agreed, in order to resolve this matter, that Respondent be permitted to enter into a Consent Order with the Department, providing for the imposition of disciplinary measures which are fair and equitable in the circumstances and which are consistent with the best interests of the people of the State of Illinois.

#### CONDITIONS

WHEREFORE, the Department, through Jennifer E. Kirchner, as supervised by Gertrude M. Kelly, Chief of Health Related Prosecutions, and Jennifer L. Wright, agree:

A. Respondent's Registered Professional Nurse's License No. 041290256 shall be placed on a **Definite Suspension** for three (3) months and then immediately placed on an **Indefinite Probation** for a minimum period of three (3) years. During the period of Probation, Respondent shall adhere to the following:

1. Respondent shall not ingest alcohol;
2. Respondent shall not ingest mood or mind altering substances except those therapeutically prescribed by treating prescriber whose patient records reflect that the treating prescriber knew of Respondent's disease and ongoing recovery;
3. Respondent shall provide monthly random urine screens during the Probationary period. Failure, refusal to give the screens, or a positive result shall be a violation of Probation;
4. Respondent shall provide the Department with quarterly reports which include:
  - a. current residential address and telephone number where she can be

reached;

- b. if working as a nurse, Respondent shall provide a copy of any performance evaluation completed by her employer within the prior quarter. Respondent, shall at the beginning of this Probation, provide the Department with objective documentation as to the frequency of employee performance evaluations;
- c. a description of job duties, responsibilities and name of immediate supervisor, if employed in a nursing related environment;
- d. a copy of all incident reports within the prior quarter;
- e. log of recovery meetings attended which include date, time, location, group name and topic;
- f. information regarding any arrests, criminal or civil actions filed, including DUI and/or other similar offenses against the Respondent as well as any other complaints regarding Respondent's practice.
- g. Respondent agrees that any violation of paragraphs A(1), A(2), or A(3) of this Consent Order permits the Director of the Department of Professional Regulation to issue an Order forthwith mandating the automatic, indefinite and immediate suspension of Respondent's Registered Professional Nurse's License No. 041-290256 for a minimum period of twelve (12) months. This suspension shall not preclude the Department from taking any other disciplinary or other action it deems appropriate. In the event Respondent contests in writing (by the filing of an appropriate motion with the Department) the factual basis underlying said suspension then Respondent shall be afforded a hearing on the merits within thirty (30) days from the filing of said motion.

5. Respondent will observe the following work restrictions:

- a. Will not work registry, traveling nurse, float pool, or any temporary employment agency, in a home or other community-based setting in which direct supervision is not available;
  - b. Will work in a setting where there is always a minimum of one other registered nurse present;
  - c. Will not work night shifts;
  - d. Will not work more than three(3) 12-hour shifts on consecutive days;
  - e. Will not have access to or dispense narcotics or synthetic narcotics, including, but not limited to, Ultram, Nubain and Stadol or other potentially addictive medication; and
  - f. Will not accept a supervisory position for one (1) year from the date of entry of this Consent Order
6. Respondent shall notify the Department's Nurse Investigative Supervisor in writing of any change in employment and home address and telephone within five (5) days;
7. Respondent shall meet with Probation Investigations staff for compliance interviews at the Department's Offices as directed. Respondent's practice shall be subject to random compliance inspections during the term of probation.
- B. Respondent shall obey the laws of the United States, the State of Illinois and its jurisdictions pertaining to alcohol and controlled substances.
- C. When petitioning for restoration of Respondent's Registered Professional Nurse license from Indefinite Probation, Respondent must show by competent evidence:
1. That Respondent's treating physician has informed the Department in writing that Respondent is competent to practice nursing;
  2. That Respondent has complied with all of the provisions of this Consent Order;

3. That Respondent has complied with all statutory requirements for renewal or reinstatement, including but not limited to continuing education, payment of all necessary fees and completion of all appropriate forms;
4. That Respondent warrants the public trust.

D. Upon notice of the effective date of this Consent Order, Respondent shall send to the Department all current indicia of licensure, including all copies of wall certificates and wallet cards. Said certificates will be retained by the Department during the period of suspension. Respondent shall send said certificates of licensure to the Department:

Illinois Department of Financial and Professional Regulation  
Probations Unit  
100 W. Randolph, Suite 9-100  
Chicago, Illinois 60601

- E. Any violation by Respondent of the terms and/or conditions of this Consent Order shall be grounds for the Department to immediately file a Complaint to revoke or otherwise discipline Respondent's license to practice as a Registered Professional Nurse in the State of Illinois.
- F. This Consent Order shall become effective upon the signing and approval by the Director of the Department.



11/7/08  
DATE

Gertrude M. Kelly  
Gertrude M. Kelly  
Chief of Health Related Prosecutions

10-27-08  
DATE

Jennifer L. Wright  
Jennifer L. Wright  
Respondent

11/03/08  
DATE

Laura Ferris  
Member, Illinois Board of Nursing

The foregoing Consent Order is approved in full.

DATED THIS 24<sup>th</sup> day of November, 2008

DEPARTMENT OF PROFESSIONAL REGULATION  
of the State of Illinois, Division of Professional Regulation;  
Dean Martinez, Secretary

Daniel E. Bluthardt

Daniel E. Bluthardt  
DIRECTOR

GMK:jk

REF: License No. 041290256  
Case No. 200800016