



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 Thomas
Executive Director of the Board

BEFORE THE TEXAS BOARD OF NURSING

In the Matter of §
Registered Nurse License Number 420083 §
issued to CAROL A FREPPON RICHARDSON §

ORDER OF THE BOARD

On this day, the Texas Board of Nursing, hereinafter referred to as the Board, accepted the voluntary surrender of Registered Nurse License Number 420083, issued to CAROL A FREPPON RICHARDSON, hereinafter referred to as Respondent. This action was taken in accordance with Section 301.453(c), Texas Occupations Code.

Respondent waived representation by counsel, informal proceedings, notice and hearing.

The Board makes the following Findings of Fact and Conclusions of Law.

FINDINGS OF FACT

1. Respondent's license to practice professional nursing in the State of Texas is currently in inactive status.
2. Respondent waived representation by counsel, informal proceedings, notice and hearing.
3. Respondent received a Diploma in Nursing from St. Vincent Infirmary, Little Rock, Arkansas, on June 22, 1966. Respondent was licensed to practice professional nursing in the State of Texas on November 16, 1969.
4. Respondent's nursing employment history is unknown.
5. On or about April 2, 2015, the Voluntary Surrender of Respondent's California registered nurse license was accepted by the California Board of Registered Nursing, Sacramento, California. A copy of the California Board of Registered Nursing's Decision and Order dated April 2, 2015, is attached and incorporated, by reference, as part of this Order.

6. Formal Charges were filed on May 28, 2015.
7. Formal Charges were mailed to Respondent on May 28, 2015.
8. On July 27, 2015, the Board received a notarized statement from Respondent voluntarily surrendering the right to practice nursing in Texas. A copy of Respondent's notarized statement, dated July 27, 2015, is attached and incorporated herein by reference as part of this Order.
9. The Board policy implementing Rule 213.29 in effect on the date of this Agreed Order provides discretion by the Executive Director for consideration of conditional reinstatement after proof of twelve (12) consecutive months of abstinence from alcohol and drugs followed by licensure limitations/stipulations and/or peer assistance program participation.
10. The Board finds that there exists serious risks to public health and safety as a result of impaired nursing care due to intemperate use of controlled substances or chemical dependency.

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 cause pursuant to Section 301.452(b)(8), Texas Occupations Code, to take disciplinary action against Registered Nurse License Number 420083, heretofore issued to CAROL A FREPPON RICHARDSON, including revocation of Respondent's license(s) to practice nursing in the State of Texas.
4. Under Section 301.453(c), Texas Occupations Code, the Board has the authority to accept the voluntary surrender of a license.
5. Under Section 301.453(d), Texas Occupations Code, the Board may impose conditions for reinstatement of licensure.
6. Any subsequent reinstatement of this license will be controlled by Section 301.453(d), Texas Occupations Code, and 22 TAC §§213.26-.29, and any amendments thereof in effect at the time of the reinstatement.

ORDER


NOW, THEREFORE, IT IS ORDERED that the voluntary surrender of Registered Nurse License Number 420083, heretofore issued to CAROL A FREPPON RICHARDSON, to practice nursing in the State of Texas, is/are accepted by the Executive Director on behalf of the Texas Board of Nursing. In connection with this acceptance, the Board imposes the following conditions:

1. RESPONDENT SHALL NOT practice professional nursing, use the title of "registered nurse" or the abbreviation "RN" or wear any insignia identifying herself as a registered nurse or use any designation which, directly or indirectly, would lead any person to believe that RESPONDENT is a registered nurse during the period in which the license/s is/are surrendered.
2. RESPONDENT SHALL NOT petition for reinstatement of licensure until: one (1) year has elapsed from the date of this Order; and, RESPONDENT has obtained objective, verifiable proof of twelve (12) consecutive months of sobriety immediately preceding the petition.
3. Upon petitioning for reinstatement, RESPONDENT SHALL satisfy all then existing requirements for relicensure.

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.

Effective this 27th day of July, 2015.

TEXAS BOARD OF NURSING

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

Carol A. Richardson

~~CAROL A. FREPPON RICHARDSON~~

~~3449 OAK DR~~

~~LAWRENCEVILLE, GA 30245~~

168 Via Olivera
Camarillo, CA. 93012

Registered Nurse License Number 420083

Voluntary Surrender Statement

Dear Texas Board of Nursing:

I no longer desire to be licensed as a nurse. Accordingly, I voluntarily surrender my license(s) to practice in Texas.

I waive representation by counsel and consent to the entry of an Order which outlines requirements for reinstatement of my license. I understand that I may not petition for reinstatement until one (1) year from the effective date of the Order. I understand that I will be required to comply with the Board's Rules and Regulations in effect at the time I submit any petition for reinstatement.

Signature

Carol Anne Richardson

Date

7-27-15

Registered Nurse License Number 420083

The State of Texas (*see California attachment*)

Before me, the undersigned authority, on this date personally appeared CAROL A. FREPPON RICHARDSON who, being duly sworn by me, stated that he or she executed the above for the purpose therein contained and that he or she understood same.

Sworn to before me the _____ day of _____, 20____.

SEAL

Notary Public in and for the State of _____

**CALIFORNIA ALL-PURPOSE
CERTIFICATE OF ACKNOWLEDGMENT
(CALIFORNIA CIVIL CODE § 1189)**

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF CALIFORNIA)
COUNTY OF Ventura)

On 07/27/2015 before me, Sabrina Ruth Ayala, Notary Public,
(Date) (Here Insert Name and Title of the Officer)

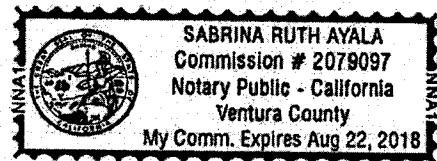
personally appeared Carol Anne Richardson
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is are
subscribed to the within instrument and acknowledged to me that he/she/they executed the same
in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument
the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing
paragraph is true and correct.

WITNESS my hand and official seal.

Sabrina Ruth Ayala
Signature of Notary Public

(Notary Seal)



ADDITIONAL OPTIONAL INFORMATION

Description of Attached Document

Title or Type of Document Surrender Statement Document Date: 07/27/2015

Number of Pages: 1 Signer(s) Other Than Named Above:

Additional Information:

BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

CAROL ANNE RICHARDSON,

Registered Nurse License No. 471425

Case No. 2014-1572

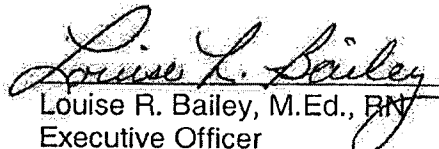
Respondent.

DECISION AND ORDER

Pursuant to Title 16 of the California Code of Regulations, section 1403, the attached Stipulated Settlement is hereby adopted by the Board of Registered Nursing as its Decision and Order in the above-entitled matter.

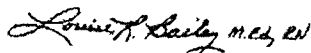
This Decision shall become effective on April 2, 2015.

IT IS SO ORDERED this 2nd day of April 2015.


Louise R. Bailey, M.Ed., RN
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California

I hereby certify the
foregoing to be a true copy
of the documents on file in our office.

BOARD OF REGISTERED NURSING


Louise R. Bailey, M. Ed., RN
Interim Executive Officer



1 KAMALA D. HARRIS
Attorney General of California
2 ARMANDO ZAMBRANO
Supervising Deputy Attorney General
3 ALVARO MEJIA
Deputy Attorney General
4 State Bar No. 216956
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
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Attorneys for Complainant
7

8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2014-1572

13 **CAROL ANNE RICHARDSON**
168 Via Olivera
Camarillo, CA 93012

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

14 Registered Nurse License No. 471425

15 Respondent
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17
18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
19 entitled proceedings that the following matters are true:

20 **PARTIES**

21 1. Louise R. Bailey, M.Ed., RN (Complainant) is the Executive Officer of the Board of
22 Registered Nursing. She brought this action solely in her official capacity and is represented in
23 this matter by Kamala D. Harris, Attorney General of the State of California, by Alvaro Mejia,
24 Deputy Attorney General.

25 2. Carol Anne Richardson (Respondent) is representing herself in this proceeding and
26 has chosen not to exercise her right to be represented by counsel.

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3. On or about August 31, 1991, the Board of Registered Nursing issued Registered Nurse License No. 471425 to Respondent Carol Anne Richardson. The Registered Nurse License expired on June 30, 2013, and has not been renewed.

JURISDICTION

4. Accusation No. 2014-1572 was filed before the Board of Registered Nursing (Board), Department of Consumer Affairs, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on June 23, 2014. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of Accusation No. 2014-1572 is attached as Exhibit A and incorporated by reference.

ADVISEMENT AND WAIVERS

5. Respondent has carefully read, and understands the charges and allegations in Accusation No. 2014-1572. Respondent also has carefully read, and understands the effects of this Stipulated Surrender of License and Order.

6. Respondent is fully aware of her legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at her own expense; the right to confront and cross-examine the witnesses against her; the right to present evidence and to testify on her own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Accusation No. 2014-1572, agrees that cause exists for discipline and hereby surrenders her Registered Nurse License No. 471425 for the Board's formal acceptance.

9. Respondent understands that by signing this stipulation she enables the Board to issue an order accepting the surrender of her Registered Nurse License without further process.

1 CONTINGENCY

2 10. This stipulation shall be subject to approval by the Board of Registered Nursing.
3 Respondent understands and agrees that counsel for Complainant and the staff of the Board of
4 Registered Nursing may communicate directly with the Board regarding this stipulation and
5 surrender, without notice to or participation by Respondent. By signing the stipulation,
6 Respondent understands and agrees that she may not withdraw her agreement or seek to rescind
7 the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt
8 this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be
9 of no force or effect, except for this paragraph, it shall be inadmissible in any legal action
10 between the parties, and the Board shall not be disqualified from further action by having
11 considered this matter.

12 11. The parties understand and agree that Portable Document Format (PDF) and facsimile
13 copies of this Stipulated Surrender of License and Order, including Portable Document Format
14 (PDF) and facsimile signatures thereto, shall have the same force and effect as the originals.

15 12. This Stipulated Surrender of License and Order is intended by the parties to be an
16 integrated writing representing the complete, final, and exclusive embodiment of their agreement.
17 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
18 negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order
19 may not be altered, amended, modified, supplemented, or otherwise changed except by a writing
20 executed by an authorized representative of each of the parties.

21 13. In consideration of the foregoing admissions and stipulations, the parties agree that
22 the Board may, without further notice or formal proceeding, issue and enter the following Order:

23 ORDER

24 IT IS HEREBY ORDERED that Registered Nurse License No. 471425, issued to
25 Respondent Carol Anne Richardson, is surrendered and accepted by the Board of Registered
26 Nursing.

27 1. The surrender of Respondent's Registered Nurse License and the acceptance of the
28 surrendered license by the Board shall constitute the imposition of discipline against Respondent.

1 This stipulation constitutes a record of the discipline and shall become a part of Respondent's
2 license history with the Board of Registered Nursing.

3 2. Respondent shall lose all rights and privileges as a Registered Nurse in California as
4 of the effective date of the Board's Decision and Order.

5 3. Respondent shall cause to be delivered to the Board her pocket license and, if one was
6 issued, her wall certificate on or before the effective date of the Decision and Order.

7 4. If Respondent ever files an application for licensure or a petition for reinstatement in
8 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must
9 comply with all the laws, regulations and procedures for reinstatement of a revoked license in
10 effect at the time the petition is filed, and all of the charges and allegations contained in
11 Accusation No. 2014-1572 shall be deemed to be true, correct and admitted by Respondent when
12 the Board determines whether to grant or deny the petition.

13 5. If and when Respondent's license is reinstated, she shall pay to the Board costs
14 associated with its investigation and enforcement pursuant to Business and Professions Code
15 section 125.3 in the amount of \$10,210.50. Respondent shall be permitted to pay these costs in a
16 payment plan approved by the Board. Nothing in this provision shall be construed to prohibit the
17 Board from reducing the amount of cost recovery upon reinstatement of the license.

18 6. If Respondent should ever apply or reapply for a new license or certification, or
19 petition for reinstatement of a license, by any other health care licensing agency in the State of
20 California, all of the charges and allegations contained in Accusation, No. 2014-1572 shall be
21 deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of
22 Issues or any other proceeding seeking to deny or restrict licensure.

23 7. Respondent shall not apply for licensure or petition for reinstatement for two (2)
24 years from the effective date of the Board of Registered Nursing's Decision and Order.

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1 ACCEPTANCE

2 I have carefully read the Stipulated Surrender of License and Order. I understand the
3 stipulation and the effect it will have on my Registered Nurse License. I enter into this Stipulated
4 Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound
5 by the Decision and Order of the Board of Registered Nursing.

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7 DATED:

October 31, 2014 Carol Anne Richardson

CAROL ANNE RICHARDSON
Respondent

10 ENDORSEMENT

11 The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted
12 for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

13
14 Dated:

2/23/2015

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
ARMANDO ZAMBRANO
Supervising Deputy Attorney General


ALVARO MEJIA
Deputy Attorney General
Attorneys for Complainant

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28 DOJ Matter ID: LA2013509918
51630702.doc

Exhibit A

Accusation Case No. 2014-1572

1 KAMALA D. HARRIS
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2 ARMANDO ZAMBRANO
Supervising Deputy Attorney General
3 ALVARO MEJIA
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Telephone: (213) 897-0083
6 Facsimile: (213) 897-2804

7 *Attorneys for Complainant*

8
9 **BEFORE THE**
BOARD OF REGISTERED NURSING
10 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

11 In the Matter of the Accusation Against:

Case No. 2014-1572

12 **CAROL ANNE RICHARDSON**
13 168 Via Olivera
14 Camarillo, CA 93012

ACCUSATION

15 Registered Nurse License No. 471425

16 Respondent.

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18 Complainant alleges:

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
21 official capacity as the Executive Officer of the Board of Registered Nursing (Board),
22 Department of Consumer Affairs.

23 2. On or about August 31, 1991, the Board issued Registered Nurse License Number
24 471425 to Carol Anne Richardson (Respondent). Respondent's registered nurse license was in
25 full force and effect at all times relevant to the charges brought herein. Respondent's license
26 expired on June 30, 2013, and has not been renewed.

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1 7. Code section 4021 provides: "Controlled substance' means any substance listed in
2 Chapter 2 (commencing with Section 11053) of Division 10 of the Health and Safety Code."

3 8. Code section 4060 provides, in pertinent part, that no person shall possess any
4 controlled substance, except that furnished upon a valid prescription/drug order.

5 9. Health and Safety Code section 11170 states that no person shall prescribe,
6 administer, or furnish a controlled substance for himself.

7 10. Health and Safety Code section 11173, subdivision (a), states, in pertinent part, that
8 "[n]o person shall obtain or attempt to obtain controlled substances, or procure or attempt to
9 procure the administration of or prescription for controlled substances, (1) by fraud, deceit,
10 misrepresentation, or subterfuge . . ."

11 11. Health and Safety Code section 11377, in pertinent part, makes it unlawful to possess
12 any controlled substance in Schedule II, subdivision (d), without a prescription.

13 **COST RECOVERY**

14 12. Code section 125.3 provides, in pertinent part, that the Board may request the
15 administrative law judge to direct a licentiate found to have committed a violation or violations of
16 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
17 enforcement of the case, with failure of the licentiate to comply subjecting the license to not being
18 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
19 included in a stipulated settlement.

20 **CONTROLLED SUBSTANCES**

21 13. "Fentanyl" is a Schedule II controlled substance as designated by Health and Safety
22 Code section 11055, subdivision (c)(8).

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FIRST CAUSE FOR DISCIPLINE

**(Use of Controlled Substances to an Extent or in a Manner
Dangerous or Injurious to Oneself or Others)**

14. Respondent's license is subject to disciplinary action for unprofessional conduct pursuant to Code section 2761, subdivision (a) as defined by Code section 2762, subdivision (b), because Respondent used the controlled substance Fentanyl to an extent or in a manner dangerous or injurious to himself and/or others, as set forth below.

a. On January 17, 2012, Respondent participated in a "Weingarten" investigative interview conducted by VCMC. During this interview, Respondent admitted that between December 2011 and January 2012, while working as a senior registered nurse at VCMC, Ventura, California, she diverted intravenous Fentanyl for her own use while providing care for at least three (3) patients. Respondent could not explain her withdrawal of large quantities of intravenous Fentanyl while providing care for two other patients at VCMC during this same time period.

b. On May 1, 2013, during an interview with an investigator from the Division of Investigation, Department of Consumer Affairs, Respondent admitted to a long term drug and alcohol addiction problem, spanning her 20-year career at VCMC. Respondent stated that while employed at VCMC, "I was a functioning alcoholic. I know I am an alcoholic and a drug addict." Respondent admitted that between December 2011 and January 2012, while working as a senior registered nurse at VCMC, Ventura, California, she diverted intravenous Fentanyl for her own use while providing care for her patients. Respondent admitted that she was addicted to Fentanyl during the diversion period and that because she was under the constant influence of alcohol and Fentanyl during this time, she did not recall specific details regarding her Fentanyl diversion.

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1 **SECOND CAUSE FOR DISCIPLINE**

2 **(Diversion and Self-Administration of Controlled Substances)**

3 15. Respondent's license is subject to disciplinary action for unprofessional pursuant to
4 Code section 2761, subdivision (a), as defined by Code section 2762, subdivision (a), because
5 Respondent committed the following acts:

6 **Diversion of Controlled Substances:**

7 a. Respondent obtained the controlled substance Fentanyl by fraud, deceit,
8 misrepresentation, or subterfuge, in violation of Health and Safety Code section 11173,
9 subdivision (a), as set forth below.

10 1. Respondent admitted that she diverted intravenous Fentanyl on at least five (5)
11 occasions between December 2011 and January 2012 while working as a senior registered nurse
12 at Ventura County Medical Center (VCMC) in Ventura, California, as more particularly set forth
13 in paragraph 14, incorporated herein.

14 2. On and between December 2011 and January 2012, in the course and scope of
15 her job duties as a senior registered nurse in the Obstetrics, Labor, and Delivery Department at
16 VCMC, Ventura, California, Respondent removed multiple doses of intravenous Fentanyl from
17 VCMC's Pyxis System (a computerized medication dispensing system) for five (5) patients in
18 excess of documented physician orders. Respondent failed to correctly chart the administration
19 of the Fentanyl in the patients' medication administration record, failed to document the wastage
20 of the Fentanyl in the Pyxis System, and falsified or made grossly incorrect, grossly inconsistent,
21 or unintelligible entries in the patients' records, as set forth in paragraph 16, incorporated herein.

22 **Self-Administration of Controlled Substances:**

23 b. Respondent self-administered the controlled substances Fentanyl, without proper
24 authorization, as set forth in paragraph 14, incorporated herein.

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1 THIRD CAUSE FOR DISCIPLINE

2 (False Entries in Hospital/Patient Records)

3 16. Respondent's license is subject to disciplinary action for unprofessional conduct
4 pursuant to Code section 2761, subdivision (a), as defined by Code section 2762, subdivision (e),
5 because on and between December 2011 and January 2012, in the course and scope of her job
6 duties as a senior registered nurse in the Obstetrics, Labor, and Deliver Department at VCMC,
7 Ventura, California, Respondent falsified, or made grossly incorrect, grossly inconsistent, or
8 unintelligible entries in hospital, patient, or other records pertaining to the controlled substance

9 Fentanyl, as follows:

10 **Patient E.J.**

11 a. On December 2, 2011, between 0931 and 1712 hours, Respondent removed 28ml
12 intravenous Fentanyl from the Pyxis System for the patient when the physician's orders called for
13 the administration of 2ml Fentanyl for IV drip per hour as needed for pain. Respondent charted
14 administration of at total of 5ml Fentanyl on December 2, 2011, but failed to document the
15 wastage of the remaining 23ml of Fentanyl in the Pyxis System or otherwise account for the
16 disposition of the Fentanyl.

17 **Patient A.S.**

18 b. On December 26, 2011, between 1155 and 1810 hours, Respondent removed 50ml
19 intravenous Fentanyl from the Pyxis System for the patient when the physician's orders called for
20 the administration of 2ml Fentanyl for IV drip per hour as needed for pain. Respondent charted
21 administration of at total of 12ml Fentanyl on December 26, 2011, but failed to document the
22 wastage of the remaining 38ml of Fentanyl in the Pyxis System or otherwise account for the
23 disposition of the Fentanyl.

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1 **Patient K.L.**

2 c. On December 31, 2011, between 1630 and 1738 hours, Respondent removed 6ml
3 intravenous Fentanyl from the Pyxis System for the patient when the physician's orders called for
4 the administration of 2ml Fentanyl for IV drip per hour as needed for pain. Respondent charted
5 administration of at total of 4ml Fentanyl on December 31, 2011, but failed to document the
6 wastage of the remaining 2ml of Fentanyl in the Pyxis System or otherwise account for the
7 disposition of the Fentanyl.

8 **Patient A.C.**

9 d. On January 1, 2012, at approximately 1619 hours, Respondent removed 6ml
10 intravenous Fentanyl from the Pyxis System for the patient when the physician's orders called for
11 the administration of 2ml Fentanyl for IV drip per hour as needed for pain. Respondent failed to
12 chart administration of 2ml Fentanyl on January 1, 2012, and failed to document the wastage of
13 the remaining 4ml of Fentanyl in the Pyxis System or otherwise account for the disposition of the
14 Fentanyl.

15 **Patient G.G.**

16 e. On January 5, 2012, between 1437 and 1651 hours, and January 6, 2012, between
17 0959 and 1435 hours, Respondent removed 84ml intravenous Fentanyl from the Pyxis System for
18 the patient when the physician's orders called for the administration of 2ml Fentanyl for IV drip
19 per hour as needed for pain. Respondent charted administration of at total of 17ml Fentanyl
20 between January 5 and 6, 2012, but failed to document the wastage of the remaining 67ml of
21 Fentanyl in the Pyxis System or otherwise account for the disposition of the Fentanyl.

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1 PRAYER

2 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
3 and that following the hearing, the Board of Registered Nursing issue a decision:

4 1. Revoking or suspending Registered Nurse License Number 471425, issued to Carol
5 Anne Richardson;

6 2. Ordering Carol Anne Richardson, to pay the Board of Registered Nursing the
7 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
8 Professions Code section 125.3;

9 3. Taking such other and further action as deemed necessary and proper.
10

11
12 DATED: JUNE 23, 2014

Louise R. Bailey
13 LOUISE R. BAILEY, M.ED., RN
14 Executive Officer
15 Board of Registered Nursing
16 Department of Consumer Affairs
17 State of California
18 Complainant
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28 DOJ Matter ID: LA2013509918
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