



Executive Director of the Board

BEFORE THE TEXAS BOARD OF NURSING

In the Matter of §
Vocational Nurse License Number 229212 §
issued to WILLIAM RONALD LITTLE §

ORDER OF THE BOARD

On this day, the Texas Board of Nursing, hereinafter referred to as the Board,

accepted the voluntary surrender of Vocational Nurse License Number 229212, issued to WILLIAM RONALD LITTLE, 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 vocational nursing in the State of Texas is currently in delinquent status.
2. Respondent waived representation by counsel, informal proceedings, notice and hearing.
3. Respondent received a Certificate in Vocational Nursing from Army Practical Nurse Course, Fort Sam Houston, Texas, on July 2, 2010. Respondent was licensed to practice professional nursing in the State of Texas August 3, 2010.
4. Respondent's nursing employment history is unknown.
5. On or about August 21, 2015, the Voluntary Relinquishment of Respondent's Florida practical nurse license was accepted by the State of Florida Board of Nursing, Tallahassee, Florida. A copy of the State of Florida Board of Nursing's Final Order Dated August 21, 2015, is attached and incorporated, by reference, as part of this Order.

6. On October 16, 2015, the Board received a statement from Respondent through Brenda McLarty Little, his mother and Power of Attorney, voluntarily surrendering the right to practice nursing in Texas. A copy of Respondent's notarized statement, dated October 16, 2015, and Power of Attorney dated April 2, 2014, is attached and incorporated herein by reference as part of this Order.
7. 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.
8. 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 Vocational Nurse License Number 229212, heretofore issued to WILLIAM RONALD LITTLE, 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.

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ORDER


NOW, THEREFORE, IT IS ORDERED that the voluntary surrender of Vocational Nurse License Number 229212, heretofore issued to WILLIAM RONALD LITTLE, 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 vocational nursing, use the title of "vocational nurse" or the abbreviation "LVN" or wear any insignia identifying himself as a vocational nurse or use any designation which, directly or indirectly, would lead any person to believe that RESPONDENT is a vocational 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 16th day of October, 2015.

TEXAS BOARD OF NURSING

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

WILLIAM RONALD LITTLE
3927 BUCKHORNE DR, UNIT D
ORANGE PARK, FL 32065
Vocational Nurse License Number 229212

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

William Ronald Little by power of attorney
Brenda Little Mosher

Date

10/16/2015

Vocational Nurse License Number 229212

The State of Texas

Before me, the undersigned authority, on this date personally appeared WILLIAM RONALD LITTLE 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 _____

POWER OF ATTORNEY

BY THIS POWER OF ATTORNEY, I, William Ronald Little, ("Principal"), whose date of birth is February 5, 1986, Social Security Number [REDACTED], and whose permanent mailing address is 2486 The Woods Drive E., Jacksonville, Florida 32246, Duval County, Florida, do hereby appoint my mother, Brenda McLarty Little ("Agent"), whose date of birth is October 21, 1960, Social Security Number [REDACTED] and whose address is 2486 The Woods Drive E., Jacksonville, Florida 32246, Duval County, Florida, as my true and lawful attorney-in-fact, to act in my behalf in my individual capacity with full power of substitution to act on my behalf.

The terms "I," "me," and "my," as used hereinafter refer to Principal in his individual capacity.

This durable power of attorney is not affected by my subsequent incapacity except as provided by Florida Statute Section 709.08, and is exercisable from the date of execution.

1. General Grant of Power

I hereby grant to my Agent full power and authority to exercise or perform any act, power, duty, right or obligation whatsoever that I now have or may acquire, hereafter in my individual capacity, relating to any person, matter, transaction, or any interest in property owned by me, including, without limitation, my interest in all real property, including homestead real property; all personal property, tangible or intangible; all property held in any type of joint tenancy, including a tenancy in common, joint tenancy with right of survivorship, or a tenancy by the entirety; all property over which I hold a general, limited, or special power of appointment; chooses in action; and all other contractual or statutory rights or elections, including, but not limited to, any rights or elections in any probate or similar proceeding to which I am or may become entitled; all as to such property now owned or hereafter acquired by me. I grant to my Agent full power and authority to do everything necessary in exercising any of the powers herein granted as fully as I might or could do if personally present, with full power of substitution or revocation. Except as otherwise limited by applicable law, or by this durable power of attorney, my attorney in fact has full authority to perform, without prior court approval, every act authorized and specifically enumerated in this durable power of attorney. I hereby ratify and confirm that my Agent shall lawfully have, by virtue of this durable power of attorney, the powers herein granted, including, but not limited to, the following:

- a. Collect all sums of money and other property that may be payable or belonging to me, and to execute receipts, releases, cancellations or discharges.
- b. Settle any account in which I have any interest and to pay or receive the balance of that account as the case may require.
- c. Borrow money on such terms and with such security as my attorney may

think fit and to execute all notes, mortgages and other instruments that my attorney finds necessary or desirable.

d. Draw, accept, endorse or otherwise deal with any checks or other commercial or mercantile instruments for my benefit, specifically including the right to make withdrawals or deposits from any checking or savings account or savings and loan deposit, and to close the accounts, including but not limited to my accounts.

e. Redeem bonds issued by the United States government or any of its agencies, any other bonds and any certificated of deposit or other similar assets belonging to me.

f. Sell bonds, shares of stock, warrants, debentures, or other assets belonging to me, and execute all assignments and other instruments necessary or proper for transferring them to the purchaser or purchasers, and give good receipts and discharges for all money payable in respect to them. Also, to execute stock powers or similar documents on my behalf and delegate to a transfer agent or similar person the authority to register any stocks, bonds, or other securities either into or out of my name or nominee's name.

g. Sell, rent, lease for any term, mortgage or exchange any real estate or interests in it, including homestead property, for such considerations and upon such terms and conditions as my attorney may see fit, and execute, acknowledge and deliver all instruments conveying or encumbering title to property owned by me alone as well as any owned by me and by any other person, jointly.

Such instruments shall include, but not be limited to, contracts, deeds, affidavits, bills of sale, closing statement, mortgages, notes and such other instruments as may be required to carry out the purposes herein expressed, and I hereby give and grant unto the attorney in fact named herein full power and authority to do and perform all and every act and thing whatsoever requisite and necessary to be done in and about the premises as fully, to all intents and purposes, as I might or could do if personally present, with full power of substitution and revocation, hereby ratifying and confirming all that said attorney shall lawfully do or cause to be done by virtue hereof.

h. To represent me before the Treasury Department in connection with an matter involving any federal taxes in which I am a party, to make, sign, execute, verify and file any return required to be made under the revenue laws of the United States, or the Internal Revenue Code; or under the statutes of any state and to file any claim for refund, offer and compromise or application for a closing agreement, receive refund checks, execute waivers of any period of limitation, request extensions of time, execute any waiver of restrictions on assessment for collection of any tax, and execute Petition of Appeal to the United States Tax Court.

i. To create living trusts and transfer assets to such trusts and/or existing trusts.

The above powers conferred upon my attorney in fact extend to all of my right, title and interest in such property as I have described above and in which I may have an interest jointly and with any other person, whether in an estate by the entirety, joint tenancy or tenancy in common.

2. Limitations

Notwithstanding the powers contained in this durable power of attorney, my attorney in fact may not:

- a. Perform duties under a contract that required the exercise of my personal services;
- b. Make any affidavit as to my personal knowledge;
- c. Vote in any public election on my behalf;
- d. Execute or revoke any will or codicil on my behalf;
- e. Create, amend, modify, or revoke any document or other disposition effective at my death unless expressly authorized by the power of attorney; or
- f. Exercise powers and authority granted to me as trustee or as court-appointed fiduciary.

3. Interpretation and Governing Law

This instrument is executed by me in the State of Florida, but it is my intention that this power of attorney shall be exercisable in any other state or jurisdiction where I may have any property or interests in property.

This instrument is to be construed and interpreted as a durable power of attorney as provided for in Florida Statute Section 709.08 as this statute may be amended from time to time. The enumeration of specific powers herein is not intended to, and does not, limit or restrict the general powers herein granted to my Agent. This instrument is executed and delivered in the State of Florida, and the laws of the State of Florida shall govern all questions as to the validity of this power and the construction of its provisions.

4. Revocation of Prior Instruments

By this instrument I hereby revoke any power of attorney, durable or otherwise, that I may have executed prior to the date of this durable power of attorney.

I hereby confirm all acts of my attorney in fact pursuant to this power.

Any act that is done under this power between the revocation of this instrument and notice of that revocation to my attorney shall be valid unless the person claiming the benefit of the act had notice of that revocation.

A photocopy of this Power of Attorney shall be acceptable for the release of the requested information.

IN WITNESS WHEREOF, I have set my hand and seal on this 2nd day of April, 2014.



William Ronald Little

STATEMENT OF WITNESSES

I declare, under penalty of perjury, that the Principal is personally known to me, or has produced _____ as identification, that the Principal signed or acknowledged this Durable Power of Attorney in my presence, that the Principal appears to be of sound mind and under no duress, fraud, or undue influence, and that I am not the person appointed as Attorney-in-Fact by this document.

M. Alan Ceballos
Witness Signature

Date: 4/2/14


Witness Signature

Date: 4/2/14

M. Alan Ceballos
Printed Name of Witness

200 E. Forsyth St Jax FL 32202
Address of Witness

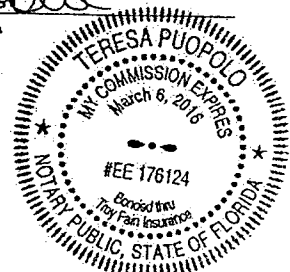
TRANS Reinhold
Printed Name of Witness

255 N. Liberty St JAX, FL 32202
Address of Witness

STATE OF FLORIDA
COUNTY OF DUVAL

Sworn to or affirmed and signed before me on the 2nd day of April, 2014, by William R. Little. He she is either _____ personally known or produced _____ as identification.

Teresa Puopolo
NOTARY PUBLIC



FILED DATE **AUG 21 2015**

Department of Health

By: 
Deputy Agency Clerk

STATE OF FLORIDA
BOARD OF NURSING

DEPARTMENT OF HEALTH,

Petitioner,

vs.

Case No.: 2013-10968

License No.: PN 5198285

WILLIAM RONALD LITTLE,

Respondent.
_____ /

FINAL ORDER

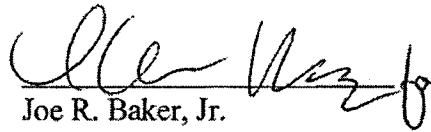
THIS CAUSE came before the BOARD OF NURSING (Board) pursuant to Sections 120.569 and 120.57(4), Florida Statutes, on August 6, 2015, in Miami, Florida, for the purpose of considering a voluntary relinquishment (attached hereto as Exhibit A). Petitioner has filed an Administrative Complaint seeking disciplinary action against the license. A copy of the Administrative Complaint is attached to and made a part of this Final Order as Exhibit B. Upon consideration of the voluntary relinquishment, the documents submitted in support thereof, the arguments of the parties, and being otherwise fully advised in the premises, it is hereby

ORDERED AND ADJUDGED that the voluntary relinquishment is accepted as a resolution of this case.

This Final Order shall take effect upon being filed with the Clerk of the Department of Health.

DONE AND ORDERED this 19th day of August, 2015.

BOARD OF NURSING



Joe R. Baker, Jr.
Executive Director *for*
Jody Bryant Newman, EdD, EdS
Chair

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Final Order has been provided by U.S. Mail to WILLIAM RONALD LITTLE, 8787 South Side Blvd., #711, Jacksonville, Florida 32256; DC #J54223, Calhoun Correctional Institution Drive, Blountstown, Florida 32424-5156; and by interoffice delivery to and by email to Dept. of Health - PSU, at Matthew.Witters@flhealth.gov and by email to Lee Ann Gustafson, Senior Assistant Attorney General, at LeeAnn.Gustafson@myfloridalegal.com this 21 day of August, 2015.



Deputy Agency Clerk



TO: Adrienne Rodgers, Chief
Bureau of Health Care Practitioner Regulation

FROM: Joe Baker, Jr., Executive Director
Florida Board of Nursing

DATE: August 17, 2015

RE: Delegation of Authority

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During my absence on Tuesday, August 18, 2015, through Friday, August 21, 2015, the following managers are delegated authority for the board office:

8/18-19	Tihara Rozier	Program Ops Administrator
8/20-21	William Spooner	Program Ops Administrator

Thank you.

JBjr/ms

PRACTITIONER REGULATION
LEGAL

2015 MAY -7 AM 8:03

STATE OF FLORIDA
DEPARTMENT OF HEALTH

FILED
DEPARTMENT OF HEALTH
DEPUTY CLERK
CLERK *Angel Sanders*
DATE **MAY 08 2015**

DEPARTMENT OF HEALTH,

Petitioner,

v.

Case No. 2013-10968

WILLIAM RONALD LITTLE, L.P.N.,

Respondent.

VOLUNTARY RELINQUISHMENT OF LICENSE

Respondent, **WILLIAM RONALD LITTLE, L.P.N.**, license number **PN 5198285**, hereby voluntarily relinquishes Respondent's license to practice as a licensed practical nurse in the State of Florida and states as follows:

1. Respondent's purpose in executing this Voluntary Relinquishment is to avoid further administrative action with respect to this case. Respondent understands that acceptance by the Board of Nursing (hereinafter "the Board") of this Voluntary Relinquishment shall be construed as disciplinary action against Respondent's license pursuant to Section 456.072(1)(f), Florida Statutes. As with any disciplinary action, this relinquishment will be reported to the National Practitioner's Data Bank. Licensing authorities in other states may impose discipline in their jurisdiction based on discipline taken in Florida.

2. Respondent agrees to voluntarily cease practicing as a licensed practical nurse immediately upon executing this Voluntary Relinquishment. Respondent further agrees to refrain from the practice of nursing until such time as this Voluntary

Relinquishment is presented to the Board and the Board Issues a written Final Order in this matter.

3. In order to expedite consideration and resolution of this action by the Board in a public meeting, Respondent, being fully advised of the consequences of so doing, hereby waives the statutory privilege of confidentiality of Section 456.073(10), Florida Statutes, and waives a determination of probable cause, by the Probable Cause Panel, or the Department when appropriate, pursuant to Section 456.073(4), Florida Statutes, regarding the complaint, the investigative report of the Department of Health, and all other information obtained pursuant to the Department's investigation in this case. By signing this waiver, Respondent understands that the record and complaint become public record and remain public record and that information is immediately accessible to the public.

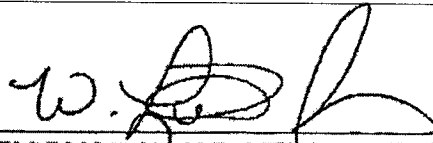
4. Upon the Board's acceptance of this Voluntary Relinquishment, Respondent agrees to waive all rights to seek judicial review, or to otherwise challenge or contest the validity of this Voluntary Relinquishment and of the Final Order of the Board incorporating this Voluntary Relinquishment.

5. Petitioner and Respondent hereby agree that upon the Board's acceptance of this Voluntary Relinquishment, each party shall bear its own attorney's fees and costs related to the prosecution or defense of this case.

6. Respondent authorizes the Board to review and examine all investigative file materials concerning Respondent in connection with the Board's consideration of this Voluntary Relinquishment. Respondent agrees that consideration of this Voluntary

Relinquishment and other related materials by the Board shall not prejudice or preclude the Board, or any of its members, from further participation, consideration, or resolution of these proceedings if the terms of this Voluntary Relinquishment are not accepted by the Board.

SIGNED this 5 day of May, 2015.



WILLIAM RONALD LITTLE, L.P.N.

STATE OF FLORIDA

COUNTY OF _____

Before me personally appeared _____ whose identity is known to be by _____ (type of identification), and who under oath, acknowledges that his/her signature appears above. Sworn to and subscribed by Respondent before me this _____ day of _____, 2015.

Notary Public

My Commission Expires:

**STATE OF FLORIDA
DEPARTMENT OF HEALTH**

DEPARTMENT OF HEALTH,

PETITIONER,

v.

CASE NO. 2013-10968

WILLIAM RONALD LITTLE, L.P.N.,

RESPONDENT.

ADMINISTRATIVE COMPLAINT

COMES NOW, Petitioner, Department of Health, by and through its undersigned counsel, and files this Administrative Complaint before the Board of Nursing against Respondent, William Ronald Little, L.P.N., and in support thereof alleges:

1. ~~Petitioner is the state agency charged with regulating the~~
practice of nursing pursuant to Section 20.43, Florida Statutes; Chapter 456, Florida Statutes; and Chapter 464, Florida Statutes.

2. At all times material to this Administrative Complaint, Respondent was a licensed practical nurse (L.P.N.) within the State of Florida, having been issued license number PN 5198285.

3. Respondent's address of record is 8787 South Side Boulevard, #711, Jacksonville, Florida 32256.

4. An alternate address for Respondent is DC No. 354223, Calhoun Correctional Institution, 19562 SE Institution Drive, Blountstown, Florida 32424-5156.

5. Respondent is licensed pursuant to Chapter 464, Florida Statutes, and is a health care practitioner as defined in Section 456.001(4), Florida Statutes (2014).

FACTS RELATED TO COUNT ONE

6. On or about October 6, 2014, in the Circuit Court, Fourth Judicial Circuit, in and for Duval County, Florida, Case No. 16-2013-CF-006292-AXXX-MA, Respondent entered a plea of guilty to nine counts of Trafficking in Morphine, Opium, Oxycodone, Heroin, Hydrocodone, or their Derivatives, in violation of Section 893.135(1)(C)1c, Florida Statutes (2014), and one count of Obtaining or Attempting to Obtain a Controlled Substance by Fraud, in violation of Section 893.13(7)(a)9, Florida Statutes (2014).

7. A licensed practical nurse is one of a handful of categories of licensed professionals that provides direct patient care, in many instances, to minors, the elderly or those with long-term infirmities, often in patient's homes or in nursing home settings where they have access to patient's prescriptions, medications, identification and valuables. As such, entering a plea of guilty to nine counts of trafficking in morphine, opium, oxycodone, heroin, hydrocodone, or their derivatives, and one count of obtaining or attempting to obtain a controlled substance by fraud relates to the practice of, or the ability to practice, nursing and violates the level of trust and confidence invested by the Legislature in these categories of licensees.

FACTS RELATED TO COUNT TWO

8. Respondent failed to report his pleas of guilty to nine counts of trafficking in morphine, opium, oxycodone, heroin, hydrocodone, or their Derivatives, and one count of obtaining or attempting to obtain a controlled substance by fraud, as set forth in paragraph six, to the Board of Nursing, in writing, within thirty (30) days from the date Respondent entered the pleas.

9. On or about November 7, 2014, in the Circuit Court, Fourth Judicial Circuit, in and for Duval County, Florida, Case No. 16-2014-CF-001764-AXXX-MA, Respondent entered a plea of guilty to two counts of Lewd or Lascivious Battery, in violation of Section 800.04(4)(A), Florida Statutes (2014), and one count of Sale/Providing Alcoholic Beverage to a Person Under Age 21, in violation of Section 562.11(1)(A), Florida Statutes (2014).

10. Respondent failed to report his pleas of guilty to two counts of Lewd or Lascivious Battery, and one count of Sale/Providing Alcoholic Beverage to a Person Under Age 21, to the Board of Nursing, in writing, within thirty (30) days from the date Respondent entered the pleas.

COUNT ONE

11. Petitioner realleges and incorporates paragraphs one through seven as if fully set forth herein.

12. Section 456.072(1)(c), Florida Statutes (2014), provides that being convicted or found guilty of, or entering a plea of guilty or nolo contendere to, regardless of adjudication, a crime in any jurisdiction which

relates to the practice of, or the ability to practice, a licensee's profession, constitutes grounds for disciplinary action.

13. As set forth above, Respondent entered a plea of guilty to nine counts of Trafficking in Morphine, Opium, Oxycodone, Heroin, Hydrocodone, or their Derivatives, in violation of Section 893.135(1)(C)1c, Florida Statutes (2014), and one count of Obtaining or Attempting to Obtain a Controlled Substance by Fraud, in violation of Section 893.13(7)(a)9, Florida Statutes (2014), which relates to the practice of, or the ability to practice, a licensee's profession.

14. Based on the foregoing, Respondent violated Section 456.072(1)(c), Florida Statutes (2014), for being convicted or found guilty of, or entering a plea of guilty or nolo contendere to, regardless of adjudication, a crime in any jurisdiction which relates to the practice of, or the ability to practice, a licensee's profession

COUNT TWO

15. Petitioner realleges and incorporates paragraphs one through five and eight through ten as if fully set forth herein.

16. Section 456.072(1)(x), Florida Statutes (2014), provides that failing to report to the board, or the department if there is no board, in writing within 30 days after the licensee has been convicted or found guilty of, or entered a plea of nolo contendere to, regardless of adjudication, a crime in any jurisdiction is grounds for disciplinary action.

17. As set forth above, Respondent failed to report to the Board of Nursing in writing, within 30 days, the following pleas:

a. guilty to nine counts of Trafficking in Morphine, Opium, Oxycodone, Heroin, Hydrocodone, or their Derivatives, in violation of Section 893.135(1)(C)1c, Florida Statutes (2014);

b. guilty to one count of Obtaining or Attempting to Obtain a Controlled Substance by Fraud, in violation of Section 893.13(7)(a)9, Florida Statutes (2014);

c. guilty to two counts of Lewd or Lascivious Battery, in violation of Section 800.04(4)(A), Florida Statutes (2014);
and/or

d. guilty to one count of Sale/Providing Alcoholic Beverage to a Person Under Age 21, in violation of Section 562.11(1)(A), Florida Statutes (2014).

18. Based on the foregoing, Respondent violated Section 456.072(1)(x), Florida Statutes (2014), for failing to report to the board, or the department if there is no board, in writing within 30 days after the licensee has been convicted or found guilty of, or entered a plea of nolo contendere to, regardless of adjudication, a crime in any jurisdiction.

{Remainder of page intentionally left blank}

WHEREFORE, the Petitioner respectfully requests that the Board of Nursing enter an order imposing one or more of the following penalties: permanent revocation or suspension of Respondent's license, restriction of practice, imposition of an administrative fine, issuance of a reprimand, placement of the Respondent on probation, corrective action, refund of fees billed or collected, remedial education and/or any other relief that the Board deems appropriate.

SIGNED this 24th day of February, 2015.

JOHN H. ARMSTRONG, MD, FACS
State Surgeon General and Secretary of Health

N. Thomas

Natalia S. Thomas
Assistant General Counsel
Florida Bar Number 83826
DOH Prosecution Services Unit
4052 Bald Cypress Way, Bin C-65
Tallahassee, Florida 32399-3265
Telephone: (850) 245-4444 ext. 8218
Facsimile: (850) 245-4683
Email: Natalia.Thomas@flhealth.gov

/NST

PCP: February 24, 2015
PCP Members: Whitson and Kemp

FILED
DEPARTMENT OF HEALTH
DEPUTY CLERK
CLERK Angel Sanders
DATE 2/25/2015

NOTICE OF RIGHTS

Respondent has the right to request a hearing to be conducted in accordance with Section 120.569 and 120.57, Florida Statutes, to be represented by counsel or other qualified representative, to present evidence and argument, to call and cross-examine witnesses and to have subpoena and subpoena duces tecum issued on his or her behalf if a hearing is requested.

NOTICE REGARDING ASSESSMENT OF COSTS

Respondent is placed on notice that Petitioner has incurred costs related to the investigation and prosecution of this matter. Pursuant to Section 456.072(4), Florida Statutes, the Board shall assess costs related to the investigation and prosecution of a disciplinary matter, which may include attorney hours and costs, on the Respondent in addition to any other discipline imposed.