

IN THE MATTER OF PERMANENT  
PERMANENT REGISTERED NURSE  
LICENSE NUMBER 835028 &  
PERMANENT VOCATIONAL NURSE  
LICENSE NUMBER 211675  
ISSUED TO  
BRANDON MATTHEW WAKELAND,  
RESPONDENT

§ BEFORE THE TEXAS  
§  
§ BOARD OF NURSING  
§  
§ ELIGIBILITY AND  
§  
§ DISCIPLINARY COMMITTEE  
§

**ORDER OF THE BOARD**

TO: Brandon Matthew Wakeland  
6507 Northridge  
Dallas, TX 75214

During open meeting held in Austin, Texas, on November 8, 2016, 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 835028 and Permanent Vocational Nurse License Number 211675, previously issued to BRANDON MATTHEW WAKELAND, to practice nursing in the State of Texas be, and the same 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 8th day of November, 2016.

TEXAS BOARD OF NURSING



BY:

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

Attachment: Formal Charge filed August 29, 2016.

d17r(RN-LVN)(2016.05.11)

Re: Permanent Registered Nurse License Number 835028  
& Permanent Vocational Nurse License Number 211675  
Issued to BRANDON MATTHEW WAKELAND  
DEFAULT ORDER - REVOKE

CERTIFICATE OF SERVICE

I hereby certify that on the 14 day of November, 2016, 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

Brandon Matthew Wakeland  
6507 Northridge  
Dallas, TX 75214

BY:



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

In the Matter of	§	BEFORE THE TEXAS
Permanent Registered Nurse	§	
License Number 835028 &	§	
Permanent Vocational Nurse	§	
License Number 211675	§	
Issued to BRANDON MATTHEW WAKELAND,	§	
Respondent	§	BOARD OF NURSING

### FORMAL CHARGES

This is a disciplinary proceeding under Section 301.452(b), Texas Occupations Code. Respondent, BRANDON MATTHEW WAKELAND, is a Registered Nurse holding License Number 835028, which is in current status at the time of this pleading, and is a Vocational Nurse holding License Number 211675, 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 April 13, 2014, while employed as a Registered Nurse with Methodist Dallas Medical Center, Dallas, Texas, Respondent withdrew Dilaudid from the Medication Dispensing System (Omniceil) for patients, but failed to document and/or completely and accurately document the administration of the medication in the patient's Medication Administration Record and/or nurse's notes, as follows:

Date/Time	Patient	Omniceil	MAR	Nurse's Notes
04/13/14 19:28	DU00176363	Hydromorphone 1 MG/1ML 1ML Inj Quantity: 1 EA	No Documentation	None
04/13/14 23:44	DU00176363	Hydromorphone 1 MG/1ML 1ML Inj Quantity: 1 EA	No Documentation	None

Respondent's conduct was likely to injure the patient in that subsequent caregivers would rely on his documentation to further medicate the patient which could result in an overdose. Additionally, Respondent's conduct placed the facility in violation of Chapter 481 (Controlled Substance Act) of the Texas Health and Safety Code.

The above action constitutes grounds for disciplinary action in accordance with Section 301.452(b)(10)&(13), Texas Occupations Code, and is a violation of 22 TEX. ADMIN. CODE §217.11(1)(A),(1)(B),(1)(C)&(1)(D), and 22 TEX. ADMIN. CODE §217.12(1)(A),(1)(B),(1)(C),(4) &(11)(B).

## CHARGE II.

On or about April 13, 2014, while employed as a Registered Nurse with Methodist Dallas Medical Center, Dallas, Texas, Respondent withdrew Dilaudid from the Medication Dispensing System (Omniceil) for patients, but failed to follow the facility's policy and procedure for wastage of the unused portions of the medication, as follows:

Date/Time	Patient	Omniceil	Physician's Order	MAR	Nurse's Notes	Wastage
4/13/14 19:28	DU00176363	Hydromorphone 1 MG/1ML 1ML Inj Quantity: 1 EA	Dilaudid Inj (Hydromorphone 1 MG/1 ML Inj) 0.5 MG IV every 4 hours/PRN Breakthrough Pain	No Documentation	None	None
04/13/14 19:31	DU00176363	Hydromorphone 1MG/1ML 1ML Inj Quantity: 1 EA	Dilaudid Inj (Hydromorphone 1 MG/1 ML Inj) 0.5 MG IV every 4 Hours/PRN (Breakthrough Pain)	1946 Site: Right Hand Gave: 0.5 MG IV/ Injection	None	None
04/13/14 20:59	DU00176363	Hydromorphone 1MG/1ML 1ML Inj Quantity: 1 EA	Dilaudid Inj (Hydromorphone 1 MG/1 ML Inj) 0.5 MG IV every 4 Hours/PRN (Breakthrough Pain)	2310	None	None
04/13/14 23:44	DU00176363	Hydromorphone 1MG/1ML 1ML Inj Quantity: 1 EA	Dilaudid Inj (Hydromorphone 1 MG/1 ML Inj) 0.5 MG IV every 4 Hours/PRN (Breakthrough Pain)	No Documentation	None	None

Respondent's conduct left medications unaccounted for, was likely to deceive the facility's pharmacy, and placed the pharmacy in violation of Chapter 481 (Controlled Substance Act) of the Texas Health and Safety Code.

The above action constitutes grounds for disciplinary action in accordance with Section 301.452(b)(10)&(13), Texas Occupations Code, and is a violation of 22 TEX. ADMIN. CODE §217.11(1)(A)&(1)(B), and 22 TEX. ADMIN. CODE §217.12(1)(A),(1)(B),(4),(10)(C)&(11)(B).

## CHARGE III.

On or about April 13, 2014, while employed as a Registered Nurse with Methodist Dallas Medical Center, Dallas, Texas, Respondent withdrew and/or administered Dilaudid from the Medication Dispensing System (Omniceil) for patients, in excess frequency and/or dosage of the physician's order, as follows:

Date/Time	Patient	Omniceil	Physician's Order	MAR	Nurse's Notes	Wastage
04/13/14 19:31	DU00176363	Hydromorphone 1MG/1ML 1ML Inj Quantity: 1 EA	Dilaudid Inj (Hydromorphone 1 MG/1 ML Inj) 0.5 MG IV every 4 Hours/PRN (Breakthrough Pain)	1946 Site: Right Hand Gave: 0.5 MG IV/ Injection	None	None
04/13/14 20:59	DU00176363	Hydromorphone 1MG/1ML 1ML Inj Quantity: 1 EA	Dilaudid Inj (Hydromorphone 1 MG/1 ML Inj) 0.5 MG IV every 4 Hours/PRN (Breakthrough Pain)	2310	None	None

Respondent's conduct was likely to injure the patient in that the administration of Dilaudid in excess frequency and/or dosage of the physician's order could result in the patient suffering from adverse reactions. Additionally, Respondent's conduct placed the facility in violation of Chapter 481 (Controlled Substance Act) of the Texas Health and Safety Code.

The above action constitutes grounds for disciplinary action in accordance with Section 301.452(b)(10)&(13), Texas Occupations Code, and is a violation of 22 TEX. ADMIN. CODE §217.11(1)(A),(1)(B),(1)(C)&(3), and 22 TEX. ADMIN. CODE §217.12(1)(A),(1)(B),(4)&(11)(B).

#### **CHARGE IV.**

On or about April 13, 2014, while employed as a Registered Nurse with Methodist Dallas Medical Center, Dallas, Texas, Respondent misappropriated 3 MG Dilaudid Intravenous (IV) Injection belonging to Patient Medical Record Number DU00176363, or failed to take precautions to prevent such misappropriation. Respondent's conduct was likely to defraud the patient of the cost of the medications.

The above action constitutes grounds for disciplinary action in accordance with Section 301.452(b)(10), Texas Occupations Code, and is a violation of 22 TEX. ADMIN. CODE §217.12(1)(A),(1)(B),(4),(6)(G),(8),(10)(E)&(11)(B).

#### **CHARGE V.**

On or about April 13, 2014, while employed as a Registered Nurse with Methodist Dallas Medical Center, Dallas, Texas, Respondent falsely documented on the Medication Administration Record (MAR) for Patient Medical Record Number DU00176363, the administration of 0.5 MG Dilaudid Intravenous (IV) Injection when there were no medication withdrawals from the Medication Dispensing System (Omniceil) associated with the time or date of administration. Respondent's conduct created an inaccurate medical record, and failure to administer medications as ordered by the physician could have resulted in non-efficacious treatment.

The above action constitutes grounds for disciplinary action in accordance with Section 301.452(b)(10)&(13), Texas Occupations Code, and is a violation of 22 TEX. ADMIN. CODE

§217.11(1)(A),(1)(B),(1)(C)&(1)(D), and 22 TEX. ADMIN. CODE §217.12(1)(A),(1)(B),(1)(C),(4), (6)(A),(6)(H),(10)(B)&(11)(B).

### CHARGE VI.

On or about July 29, 2014, Respondent failed to repay his Texas Guaranteed Student Loan, as provided in Section 57.491 of the Texas Education Code. Respondent's failure to repay his Texas Guaranteed Student Loan may have deprived other applicants of funds for nursing school loans.

The above action constitutes grounds for disciplinary action in accordance with Section 301.452(b)(10), Texas Occupations Code, and is a violation of 22 TEX. ADMIN. CODE §217.12(7).

### CHARGE VII.

On or about October 18, 2015, through November 4, 2015, while employed as a Registered Nurse with HealthSouth Rehabilitation Hospital of Arlington, Arlington, Texas, Respondent withdrew and/or administered medications from the Medication Dispensing System for patients in excess frequency and/or dosage of the physician's orders, as follows:

Date/Time	Patient	Controlled Substance Activity Report	Physician's Order	MAR	Nurse's Notes	Wastage
10/18/15 06:44	224530	Oxycodone IR 5 mg Tab (2)	Oxycodone (Oxy IR) 10mg = 2 tab oral, q6hr PRN Breakthrough Pain	10/18/15 07:01 CDT Oral Numeric Pain Scale: 5 Moderate Pain	10/18/15 08:41 CDT Oxycodone, 10mg Oral Pain Location: Knee Laterality: Right Pain Radiates: No Quality: Sharp, Tenderness Numeric Rating: 3	None
10/18/15 11:29	224530	Oxycodone IR 5 mg Tab (2)	Oxycodone (Oxy IR) 10mg = 2 tab oral, q6hr PRN Breakthrough Pain	10/18/15 12:17 CDT Oral Numeric Pain Scale: 4	10/18/15 13:59 CDT Oxycodone, 10mg Oral Pain Location: Knee Laterality: Right Pain Radiates: No Quality: Sharp, Tenderness Numeric Rating: 2	None
10/18/15 15:30	224530	Oxycodone IR 5 mg Tab (2)	Oxycodone (Oxy IR) 10mg = 2 tab oral, q6hr PRN Breakthrough Pain	10/18/15 17:29 CDT Oral Pain Scale: 7	None	None
11/2/15 14:37	224605	Oxycodone IR 5 mg Tab (4)	Oxycodone 20 mg = 4 tab, Oral, q6hr	11/2/15 14:34 CST Oral Numeric Pain Scale: 6	None	None
11/2/15 17:46	224605	Oxycodone IR 5 mg Tab (4)	Oxycodone 20 mg = 4 tab, Oral, q6hr	11/2/15 17:43 CST Oral Numeric Pain Scale: 4	None	None

Date/Time	Patient	Controlled Substance Activity Report	Physician's Order	MAR	Nurse's Notes	Wastage
11/4/15 07:44	224557	Tramadol 50 mg Tab (1)	Tramadol (Ultram) 50 mg=1 tab, Oral, q6hr PRN Pain scale 4-6	11/4/15 07:44 CST Oral Numeric Pain Scale: 9	None	None
11/4/15 11:41	224557	Tramadol 50 mg Tab (1)	Tramadol (Ultram) 50 mg=1 tab, Oral, q6hr PRN Pain scale 4-6	11/4/15 11:40 CST Oral Numeric Pain Scale: 10 = Worst Possible Pain	None	None

Respondent's conduct was likely to injure the patient in that the administration of Dilaudid in excess frequency and/or dosage of the physician's order could result in the patient suffering from adverse reactions. Additionally, Respondent's conduct placed the facility in violation of Chapter 481 (Controlled Substance Act) of the Texas Health and Safety Code.

The above action constitutes grounds for disciplinary action in accordance with Section 301.452(b)(10)&(13), Texas Occupations Code, and is a violation of 22 TEX. ADMIN. CODE §217.11(1)(A),(1)(B),(1)(C)&(3), and 22 TEX. ADMIN. CODE §217.12(1)(A),(1)(B),(4)&(11)(B).

#### CHARGE VIII.

On or about November 2, 2015, while employed as a Registered Nurse with HealthSouth Rehabilitation Hospital of Arlington, Arlington, Texas, Respondent withdrew medications from the Medication Dispensing System for patients, but failed to document and/or completely and accurately document or prechart the administration of the medications in the patient's Medication Administration Records (MAR) or nurses' notes, as follows:

Date/Time	Patient	Controlled Substance Activity Report	MAR	Nurse's Notes
11/2/15 09:31	223756	Oxycodone 20 mg Tab-ER (1)	No Documentation	None
11/2/15 15:52	223756	Oxycodone 20 mg Tab-ER (1)	No Documentation	None
11/2/15 14:37	224605	Oxycodone IR 5 mg Tab (4)	11/2/15 14:34 CST Oral Numeric Pain Scale: 6	None
11/2/15 17:46	224605	Oxycodone IR 5 mg Tab (4)	11/2/15 17:43 CST Oral Numeric Pain Scale: 4	None

Respondent's conduct was likely to injure the patient in that subsequent caregivers would rely on his documentation to further medicate the patient which could result in an overdose. Additionally, Respondent's conduct placed the facility in violation of Chapter 481 (Controlled Substance Act) of the Texas Health and Safety Code.

The above action constitutes grounds for disciplinary action in accordance with Section



301.452(b)(10)&(13), Texas Occupations Code, and is a violation of 22 TEX. ADMIN. CODE §217.11(1)(A),(1)(B),(1)(C)&(1)(D), and 22 TEX. ADMIN. CODE §217.12(1)(A),(1)(B),(1)(C),(4) &(11)(B).

#### CHARGE IX.

On or about November 2, 2015, through November 9, 2015, while employed as a Registered Nurse with HealthSouth Rehabilitation Hospital of Arlington, Arlington, Texas, Respondent falsely documented in the patient's Medication Administration Record (MAR) that he administered Oxycodone and Hydromorphone to patients when there were no medication withdrawals from the Medication Dispensing System associated with this time or date of administration, as follows:

Date/Time	Patient	Controlled Substance Activity Report	Physician's Order	MAR	Nurse's Notes
11/2/15	223756	None	Oxycodone (Oxycontin) 20mg = 1 tab, Tab-ER, Oral, q8hr	11/2/15 13:14 CST Oral Numeric Pain Scale: 8	None
11/4/15	224557	None	Hydromorphone 2 mg=1 tab, Oral q4hr PRN Pain scale 7-10	11/4/15 07:50 CST Oral Numeric Pain Scale: 9	None
11/9/15	224496	None	Oxycodone 10 mg = 2 tab, Oral, q4hr PRN Pain scale 6-10	11/9/15 10:22 CST Oral Numeric Pain Scale: 4	11/9/15 11:54 CST Oxycodone, 10mg Oral Pain Location: Upper Back Laterality: Bilateral Quality: Aching, Tenderness Numeric Rating: Patient Asleep Numeric Rating Score: 0

Respondent's conduct created an inaccurate medical record, and failure to administer medications as ordered by the physician could have resulted in non-efficacious treatment.

The above action constitutes grounds for disciplinary action in accordance with Section 301.452(b)(10)&(13), Texas Occupations Code, and is a violation of 22 TEX. ADMIN. CODE §217.11(1)(A),(1)(B),(1)(C)&(1)(D), and 22 TEX. ADMIN. CODE §217.12(1)(A),(1)(B),(1)(C),(4), (6)(A),(6)(H),(10)(B)&(11)(B).

#### CHARGE X.

On or about November 2, 2015, through November 9, 2015, while employed as a Registered Nurse with HealthSouth Rehabilitation Hospital of Arlington, Arlington, Texas, Respondent withdrew Hydrocodone from the Medication Dispensing System for patients, but failed to administer the Hydrocodone to patients in a timely manner, as follows:

Date/Time	Patient	Controlled Substance Activity Report	Physician's Order	MAR	Nurse's Notes	Wastage
11/2/15 06:13	223756	apap-Hydrocodone 325 mg-10 mg Tab (2)	Acetaminophen Hydrocodone (Norco 10 mg-325 mg oral tablet) 2 tab, oral, q4hr PRN Pain Scale 6-10	11/2/15 08:38 CST Oral Numeric Pain Scale: 9	11/2/15 09:42 CST acetaminophen-Hydrocodone, 2 tab oral, Pain Location: Knee Laterality: Left Pain Radiates: Yes Quality: Aching, Incisional, Sharp Numeric Rating: 5 = Moderate Pain	None
11/4/15 06:35	201901	apap-Hydrocodone 325 mg-5mg Tab (2)	Acetaminophen - Hydrocodone (Norco 5 mg-325 mg oral Tablet) 2 tab, Oral, q4hr PRN Pain Scale 6-10	11/4/15 07:27 CST Oral Numeric Pain Scale: 4	11/4/15 09:42 CST Acetaminophen - Hydrocodone, 2 tab Oral Pain Location: Shoulder Laterality: Left Pain Radiates: No Quality: Aching, Sharp, Tenderness Numeric Rating: 2	None
11/8/15 06:36	224621	apap-Hydrocodone 325 mg-10 mg Tab (1)	Acetaminophen - Hydrocodone (Norco 10 mg-325 mg oral Tablet) 1 tab, Oral, q4hr PRN severe pain Pain Scale 3-6	11/8/15 08:20 CST Oral Numeric Pain Scale: 7	11/8/15 10:53 CST Acetaminophen - Hydrocodone, 1 tab Oral Pain Location: Pelvic Laterality: Bilateral Pain Radiates: Yes Quality: Tenderness Numeric Rating: 3	None
11/8/15 15:41	224621	apap-Hydrocodone 325 mg-10 mg Tab (1)	Acetaminophen - Hydrocodone (Norco 10 mg-325 mg oral Tablet) 1 tab, Oral, q4hr PRN severe pain Pain Scale 3-6	11/8/15 17:49 CST Oral Numeric Pain Scale: 4	None	None
11/9/15 06:20	224621	apap-Hydrocodone 325 mg-10 mg Tab (1)	Acetaminophen - Hydrocodone (Norco 10 mg-325 mg oral Tablet) 1 tab, Oral, q4hr PRN severe pain Pain Scale 3-6	11/9/15 08:49 CST Oral Numeric Pain Scale: 6	11/9/15 13:49 CST Acetaminophen - Hydrocodone, 1 tab Oral Pain Location: Pelvic Numeric Rating: 2	None

Respondent's conduct was likely to injure the patients in that failure to administer the Hydrocodone in a timely manner could have resulted in nonefficacious treatment.

The above action constitutes grounds for disciplinary action in accordance with Section 301.452(b)(10)&(13), Texas Occupations Code, and is a violation of 22 TEX. ADMIN. CODE §217.11(1)(A),(1)(B)&(1)(C)&(3), and 22 TEX. ADMIN. CODE §217.12(1)(A),(1)(B),(4)&(11)(B).

### **CHARGE XI.**

On or about November 2, 2015, while employed as a Registered Nurse with HealthSouth Rehabilitation Hospital of Arlington, Arlington, Texas, Respondent misappropriated two (2) Oxycodone tabs belonging to Patient Medical Record 223756, or failed to take precautions to prevent such misappropriation. Respondent's conduct was likely to defraud the patient of the cost of the medications.

The above action constitutes grounds for disciplinary action in accordance with Section 301.452(b)(10), Texas Occupations Code, and is a violation of 22 TEX. ADMIN. CODE §217.12(1)(A),(1)(B),(4),(6)(G),(8),(10)(E)&(11)(B).

### **CHARGE XII.**

On or about December 4, 2015, while employed as a Registered Nurse with Northgate Plaza, Irving, Texas, Respondent misappropriated seventy-eight (78) Oxycodone tabs belonging to Resident W.L. and nine (9) Lorazepam tabs belonging to Resident A.O. or failed to take precautions to prevent such misappropriation. Respondent's conduct was likely to defraud the residents of the cost of the medications.

The above action constitutes grounds for disciplinary action in accordance with Section 301.452(b)(10), Texas Occupations Code, and is a violation of 22 TEX. ADMIN. CODE §217.12(1)(A),(1)(B),(4),(6)(G),(8),(10)(E)&(11)(B).

### **CHARGE XIII.**

On or about December 4, 2015, while employed as a Registered Nurse with Northgate Plaza, Irving, Texas, Respondent engaged in the intemperate use of Benzodiazepines in that he produced a specimen for a urine drug screen which resulted positive for Benzodiazepines. Possession of Benzodiazepines is prohibited by Chapter 481 of the Texas Health & Safety Code (Controlled Substances Act). The use of Benzodiazepines by a Registered Nurse, while subject to call or duty, could impair the nurse's ability to recognize subtle signs, symptoms or changes in the patient's condition, and could impair the nurse's ability to make rational, accurate, and appropriate assessments, judgments, and decisions regarding patient care, thereby placing the patient in potential danger.

The above action constitutes grounds for disciplinary action in accordance with Section 301.452(b)(9)&(10), Texas Occupations Code, and is a violation of 22 TEX. ADMIN. CODE §217.12(1)(A),(1)(B),(4),(5),(10)(A),(10)(D)&(11)(B).

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 related to Substance Use Disorders and Other Alcohol and Drug Related Conduct; related to Behavior Involving Lying and Falsification; and related to Behavior Involving Fraud, Theft, and Deception, which can be found under the "Discipline & Complaints; Board Policies & Guidelines" section of 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, located at 22 TEX. ADMIN. CODE §213.33(b), which can be found under the "Discipline & Complaints; Board Policies & Guidelines" section of the Board's website, [www.bon.texas.gov](http://www.bon.texas.gov).

Filed this 29th day of August, 20 16.

TEXAS BOARD OF NURSING



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