

BEFORE THE TEXAS BOARD OF NURSING

In the Matter of	§	AGREED ORDER
Registered Nurse License Number 959546	§	
issued to KRYSTAL HINDS	§	
	§	

On this day the Texas Board of Nursing, hereinafter referred to as the Board, considered the matter of KRYSTAL HINDS, Registered Nurse License Number 959546, hereinafter referred to as Respondent.

Information received by the Board produced evidence that Respondent may be subject to discipline pursuant to Section 301.452(b)(8), Texas Occupations Code.

Respondent waived notice and hearing and agreed to the entry of this Agreed Order approved by Katherine A. Thomas, MN, RN, FAAN, Executive Director, on August 23, 2021.

FINDINGS OF FACT

1. Prior to the institution of Agency proceedings, notice of the matters specified below in these Findings of Fact was served on Respondent and Respondent was given an opportunity to show compliance with all requirements of the law for retention of the license(s).
2. Respondent waived notice and hearing, and agreed to the entry of this Agreed Order.
3. Respondent's license to practice as a professional nurse in the State of Texas is in current status.
4. Respondent received an Associate Degree in Nursing from Amarillo College, Amarillo, Texas, on December 14, 2018. Respondent was licensed to practice professional nursing in the State of Texas on January 18, 2019.
5. On or about April 30, 2021, Respondent received a Decision and Order from the Board of Registered Nursing Department of Consumer Affairs State of California, wherein her license to practice professional nursing was reprimanded. A copy of the Decision and Order dated April 30, 2021, is attached and incorporated by reference as part of this pleading.

6. In response to Finding of Fact Number Five (5), Respondent states she does not plan on using her Texas license or returning to Texas as she lives in California now.
7. Respondent by her signature expresses her desire to voluntarily surrender the licenses.

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 959546, heretofore issued to KRYSTAL HINDS.
4. Pursuant to Section 301.463(d), Texas Occupations Code, this Agreed Order is a settlement agreement under Rule 408, Texas Rules of Evidence, in civil or criminal litigation.

TERMS OF ORDER

NOW, THEREFORE, IT IS AGREED and ORDERED that the VOLUNTARY SURRENDER of Registered Nurse License Number 959546 is accepted by the Texas Board of Nursing. In connection with this acceptance, the Board imposes the following conditions:

1. RESPONDENT SHALL NOT practice professional/registered nursing, use the title "registered nurse" or the abbreviation "RN" or wear any insignia identifying herself/himself 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 is surrendered.
2. RESPONDENT SHALL NOT petition for reinstatement of licensure until at least one (1) year has elapsed from the date of this Order.
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.

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CONTINUED ON NEXT PAGE.

RESPONDENT'S CERTIFICATION

I understand that I have the right to legal counsel prior to signing this Order. I waive representation by counsel. I have reviewed this Order. I neither admit nor deny the violation(s) alleged herein. By my signature on this Order, I agree to the entry of this Order, and any conditions of said Order, to avoid further disciplinary action in this matter. I waive judicial review of this Order. I understand that this Order becomes effective upon acceptance by the Executive Director on behalf of the Texas Board of Nursing and a copy will be mailed to me. I understand that if I fail to comply with all terms and conditions of this Order, I will be subject to investigation and disciplinary sanction, including possible revocation of my license(s) and/or privileges to practice nursing in the State of Texas, as a consequence of my noncompliance.

Signed this 19 day of OCT, 2021.



KRYSTAL HINDS, RESPONDENT

Sworn to and subscribed before me this _____ day of _____, 20____.

SEAL

Notary Public in and for the State of _____

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 San Diego

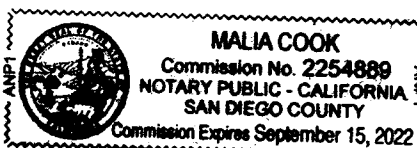
Subscribed and sworn to (or affirmed) before me on this 19 day
Of OCT, 2021 by _____
Krystal Hinds

Proved to me on the basis of satisfactory evidence to be the person(s)
who appeared before me.



Signature Notary Public

seal



WHEREFORE, PREMISES CONSIDERED, the Executive Director, on behalf of the Texas Board of Nursing does hereby ratify and adopt the Agreed Order that was signed on the 19th day of October, 2021, by KRYSTAL HINDS, Registered Nurse License Number 959546, and said Agreed Order is final.

Effective this 22nd day of October, 2021.

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

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

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

In the Matter of the Accusation Against:

Case No. 4002020007730

KRYSTAL HINDS

Registered Nurse License No. 95191327

Respondent

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order for Public Reapproval is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on **April 30, 2021.**

IT IS SO ORDERED **April 30, 2021.**

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

BOARD OF REGISTERED NURSING

Loretta Melby
Loretta Melby, RN, MSN
Executive Officer



Dolores Trujillo

Dolores Trujillo, RN
Board President
Board of Registered Nursing
Department of Consumer Affairs
State of California

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Attorney General of California
2 MARICHELLE S. TAHIMIC
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Attorneys for Complainant

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

12
13 In the Matter of the Accusation Against:

Case No. 4002020007730

14 **KRYSTAL HINDS**
8180 Whitehead Pl.
15 La Mesa, CA 91942

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER FOR PUBLIC
REPROVAL**

[Bus. & Prof. Code § 495]

16 **Registered Nurse License No. 95191327**

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

21 **PARTIES**

22 1. Loretta Melby, R.N., M.S.N. (Complainant) is the Executive Officer of the Board of
23 Registered Nursing (Board). She brought this action solely in her official capacity and is
24 represented in this matter by Xavier Becerra, Attorney General of the State of California, by
25 Dionne Mochon, Deputy Attorney General.

26 2. Respondent Krystal Hinds (Respondent) is representing herself in this proceeding and
27 has chosen not to exercise her right to be represented by counsel.

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4. Accusation No. 4002020007730 was filed before the Board and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on January 15, 2021. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of Accusation No. 4002020007730 is attached as exhibit A and incorporated herein by reference.

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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.

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9. Respondent agrees that her Registered Nurse License is subject to discipline and she agrees to be bound by the Disciplinary Order below.

CONTINGENCY

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

11. The parties understand and agree that Portable Document Format (PDF) and facsimile copies of this Stipulated Settlement and Disciplinary Order for Public Reprimand, including PDF and facsimile signatures thereto, shall have the same force and effect as the originals.

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

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

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DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Registered Nurse License No. 95191327 issued to Respondent Krystal Hinds (Respondent) shall be publicly reprovved by the Board of Registered Nursing under Business and Professions Code section 495 in resolution of Accusation No. 4002020007730, attached as exhibit A.

Coursework. No later than six months from the effective date of the public reproval, Respondent, at her own expense, shall enroll, successfully complete and submit verification of course(s) relevant to the practice of registered nursing as specified by the Board. Respondent shall obtain prior approval from the Board before enrolling in the course(s). Respondent shall submit to the Board the original transcripts or certificates of completion for the above-required course(s).

Cost Recovery. No later than twelve (12) months from the effective date of the Decision, Respondent shall pay \$5,690.00 to the Board for its costs associated with the investigation and enforcement of this matter pursuant to Business and Professions Code Section 125.3. If Respondent fails to pay the Board costs as ordered, Respondent shall not be allowed to renew her Registered Nurse License until Respondent pays costs in full. In addition, the Board may enforce this order for payment of its costs in any appropriate court, in addition to any other rights the Board may have.

Full Compliance. As a resolution of the charges in Accusation No. 4002020007730, this stipulated settlement is contingent upon Respondent's full compliance with all conditions of this Order. If Respondent fails to satisfy any of these conditions, such failure to comply constitutes cause for discipline, including outright revocation, of Respondent's Registered Nurse License No. 95191327.

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ACCEPTANCE

I have carefully read the Stipulated Settlement and Disciplinary Order for Public Reapproval. I understand the stipulation and the effect it will have on my Registered Nurse License. I enter into this Stipulated Settlement and Disciplinary Order for Public Reapproval voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Registered Nursing.

DATED: 3/15/2021 

KRYSTAL HINDS
Respondent

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order for Public Reapproval is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

DATED: _____

Respectfully submitted,

XAVIER BECERRA
Attorney General of California
MARICHELLE S. TAHIMIC
Supervising Deputy Attorney General

DIONNE MOCHON
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 4002020007730

1 XAVIER BECERRA
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2 MARICHELLE S. TAHIMIC
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3 DIONNE MOCHON
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Attorneys for Complainant
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9 **BEFORE THE**
10 **BOARD OF REGISTERED NURSING**
11 **DEPARTMENT OF CONSUMER AFFAIRS**
12 **STATE OF CALIFORNIA**

13 In the Matter of the Accusation Against:

Case No. 4002020007730

14 **KRYSTAL HINDS**
15 **8180 Whitehead Pl.**
La Mesa, CA 91942

ACCUSATION

16 **Registered Nurse License No. 95191327**

17 Respondent.

18
19 **PARTIES**

20 1. Loretta Melby, R.N., M.S.N. (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 April 3, 2019, the Board issued Registered Nurse License Number
24 95191327 to Krystal Hinds (Respondent). The Registered Nurse License was in full force and
25 effect at all times relevant to the charges brought herein and will expire on March 31, 2021,
26 unless renewed.

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1 **JURISDICTION**

2 3. This Accusation is brought before the Board under the authority of the following
3 laws. All section references are to the Code unless otherwise indicated.

4 4. Section 2750 of the Business and Professions Code (Code) provides, in pertinent part,
5 that the Board may discipline any licensee, including a licensee holding a temporary or an
6 inactive license, for any reason provided in Article 3 (commencing with section 2750) of the
7 Nursing Practice Act.

8 5. Code section 2764 provides, in pertinent part, that the expiration of a license shall not
9 deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or
10 to render a decision imposing discipline on the license.

11 **STATUTORY PROVISIONS**

12 6. Section 2761 of the Code states, in pertinent part:

13 The board may take disciplinary action against a certified or licensed nurse or
14 deny an application for a certificate or license for any of the following:

15 (a) Unprofessional conduct

16 ...

17 **COST RECOVERY**

18 7. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
19 administrative law judge to direct a licensee found to have committed a violation or violations of
20 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
21 enforcement of the case, with failure of the licensee to comply subjecting the license to not being
22 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
23 included in a stipulated settlement.

24 **DEFINITIONS**

25 8. **Vistaril** (Hydroxyzine) is a prescription medication that reduces activity in the central
26 nervous system. It is used as a sedative to treat anxiety and tension, and can also be used together
27 with other medications given during and after general anesthesia. Vistaril also acts as an
28 antihistamine that reduces the effects of natural chemical histamine in the body. Histamine can

1 produce symptoms of itching, or hives, on the skin. Vistaril is used to treat allergic skin reactions
2 such as hives or contact dermatitis.

3 FACTUAL ALLEGATIONS

4 9. At all times relevant herein, Respondent was employed at Alvarado Parkway Institute
5 (API), a behavioral health system in La Mesa, California, as a Registered Nurse (RN),
6 specifically as the Charge Nurse for API's south unit. API's Medication and Administration
7 Procedure states, in pertinent part: "Licensed nurses may only administer medications under their
8 own login. The medication administration will be electronically signed off whoever is logged in."

9 10. On or about May 29, 2020, Respondent was standing near or around the medication
10 cart currently in use by licensed vocational nurse, SA. Respondent observed Patient 1 having an
11 episode during which Patient 1 indicated that she wanted to harm herself by cutting. In response,
12 Respondent accessed the Medication Cart without logging SA out of the system, removed Vistaril
13 from the cart, scanned the medication, and administered the medication to the patient.
14 Respondent admitted that she should have logged SA out prior to accessing and administering the
15 medication.

16 FIRST CAUSE FOR DISCIPLINE

17 (Unprofessional Conduct)

18 11. Respondent is subject to disciplinary action under Code section 2761, subdivision (a),
19 in that she acted unprofessionally in violation of API's Medication and Administrative Policy by
20 administering medication under the name of another staff member, as alleged in paragraphs 9-10
21 above.

22 PRAYER

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

25 1. Revoking or suspending Registered Nurse License Number 95191327, issued to
26 Krystal Hinds;

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1 2. Ordering Krystal Hinds to pay the Board of Registered Nursing the reasonable costs
2 of the investigation and enforcement of this case, pursuant to Business and Professions Code
3 section 125.3; and,

4 3. Taking such other and further action as deemed necessary and proper.
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7 DATED: January 13, 2021

Shannon Johnson
for LORETTA MELBY, R.N., M.S.N.
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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