



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.
Kristin K. Benton, DNP, RN
Kristin K. Benton, DNP, RN
Executive Director
Texas Board of Nursing

BEFORE THE TEXAS BOARD OF NURSING

In the Matter of
Registered Nurse License Number 786229
issued to MEREDITH NEAL GRAY

§
§
§
§

REINSTATEMENT
AGREED ORDER

On this day the Texas Board of Nursing, hereinafter referred to as the Board, consid
the Petition for Reinstatement, hereinafter referred to as the Petition, of Registered Nurse License
Number 786229, held by MEREDITH NEAL GRAY, hereinafter referred to as Petitioner.

Petitioner waived notice and hearing and agreed to the entry of this Reinstatement Agreed
Order approved by Kristin K. Benton, DNP, RN, Executive Director, on January 12, 2024.

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 Petitioner and Petitioner was given an opportunity to show compliance with all requirements of the law for retention of the license(s).
2. Petitioner waived notice and hearing, and agreed to the entry of this Reinstatement Agreed Order.
3. Petitioner received an Associate Degree in Nursing from Salt Lake Community College, Salt Lake City, Utah, on December 17, 1998. Petitioner was licensed to practice professional nursing in the State of Texas on June 21, 2010.
4. Petitioner's nursing employment history includes:

| | | |
|---------------|----|-----------------------------------------------------|
| 03/98 – 05/00 | RN | Intermountain Health Care Salt Lake City, Utah |
| 05/00 – 03/01 | RN | American Mobile Healthcare San Diego, California |
| 03/01 – 09/02 | RN | Intermountain Health Care Salt Lake City, Utah |

Petitioner's nursing employment history continued:

| | | |
|-----------------|-------------------------|---------------------------------------------------------------|
| 09/02 – 08/03 | RN | Eagle Air Med Blanding, Utah |
| 08/03 – 12/04 | RN | St. Rose Dominican Hospital Henderson, Nevada |
| 01/05 – 05/05 | RN | McAllen Medical Center McAllen, Texas |
| 06/05 – 07/06 | RN | Fastaff-Summerlin Hospital Las Vegas, Nevada |
| 07/06 – 07/09 | RN | Summerlin Hospital (UHS) Las Vegas, Nevada |
| 08/09 – 02/11 | RN | Spring Branch Medical Center (HCA, Inc.) Houston, Texas |
| 02/11 – 01/12 | RN | Conroe Regional Medical Center Conroe, Texas |
| 02/12 – 11/12 | RN | Westlake Health and Wellness Center Houston, Texas |
| 12/13 – 07/16 | RN | Spine Care Consultants Kingwood, Texas |
| 08/16 – 03/18 | RN | McKenzie-Willamette Medical Center Springfield, Oregon |
| 04/18 – 08/22 | RN | Ascension Seton Austin, Texas |
| 09/22 – Present | Not employed in nursing | |

5. On or about October 18, 2012, Petitioner was issued the sanction of Warning with Stipulations through an Order of the Board. On or about January 12, 2015, Petitioner successfully completed the terms of the Order. A copy of the October 18, 2012, Order is attached and incorporated herein by reference as part of this Reinstatement Agreed Order.

6. On or about August 2, 2022, Petitioner's license to practice nursing in the State of Texas was Revoked through an Order of the Board. A copy of the August 2, 2022, Order is attached and incorporated herein by reference as part of this Reinstatement Agreed Order.
7. On or about August 15, 2023, Petitioner submitted a Petition for Reinstatement of License to practice nursing in the State of Texas.
8. Petitioner presented the following in support of said petition:
 - A. Certificate of Completion, dated August 12, 2022, granted from The Ranch at Dove Tree program dedicated to recovery.
 - B. Letter dated August 14, 2023, from Petitioner's counselor, Jaime L. Devenport, M.A., LCDC-I with The Ranch at Dove Tree. Petitioner was a client at The Ranch at Dove Tree residential treatment center from June 30, 2022, until August 12, 2022.
 - C. Letter of support dated, July 25, 2023, from Terry Don Mooney, M.Ed., LCDC a therapist with Ranch at Dove Tree IOP, Lubbock, Texas.
 - D. Letter of support dated July 21, 2023, from Laura L. Cross, MA LCDC, Clinical Director at Cenikor Amarillo.
 - E. Letter of support dated August 3, 2023, from Charles H. Colbert.
 - F. Letter of support dated, August 14, 2023, from Amy Ewing, previous Program Manager/Treehaven Transitional Living, Lubbock, Texas.
 - G. Letter of support dated July 31, 2023, from Jacqueline Dill, RN.
 - H. Letter of support dated July 31, 2023, from her AA Sponsor, Kendra Cheves.
 - I. Documentation of the required continuing education contact hours.
9. The Executive Director considered evidence of Petitioner's past behavior in light of the factors set out in 22 TEX. ADMIN. CODE §213.27 and determined that Petitioner currently demonstrates the criteria required for relicensure.
10. The Executive Director considered evidence of Petitioner's substance use disorder, and subsequent rehabilitation as provided in 22 TEX. ADMIN. CODE §213.29 and in accordance with 22 TEX. ADMIN. CODE §213.33.
11. Relicensure of Petitioner poses no direct threat to the health and safety of patients or the public provided Petitioner complies with the stipulations outlined in this Order.
12. The Executive Director's review of Petitioner's eligibility for relicensure has been made on the basis of Petitioner's disclosures.
13. Petitioner's compliance with the terms of a Board approved peer assistance program should be sufficient to protect patients and the public.

CONCLUSIONS OF LAW

1. Pursuant to Texas Occupations Code, Sections 301.451-301.555, the Board has jurisdiction over this matter.
2. This reinstatement is made pursuant to Sections 301.453(c) and 301.467, Texas Occupations Code and 22 TEX. ADMIN. CODE §213.26.
3. The Board may relicense an individual upon evaluation of the factors in 22 TEX. ADMIN. CODE §213.27, and pursuant to 22 TEX. ADMIN. CODE §213.33, if the Board is satisfied that the individual is able to consistently conform her conduct to the requirements of the Nursing Practice Act, the Board's Rules and Regulations, and generally accepted standards of nursing practice.
4. The Board may license an individual who has a history of substance use disorder after consideration of the criteria set out in 22 TEX. ADMIN. CODE §213.29 if the Board determines the individual does not pose a direct threat to the health and safety of patients or the public.
5. The Board may, in its discretion, order a nurse to participate in a peer assistance program approved by the Board if the nurse would otherwise have been eligible for referral to peer assistance pursuant to Section 301.410, Texas Occupations Code.
6. This Order is conditioned upon the accuracy and completeness of Petitioner's disclosures. Any subsequently discovered discrepancies will result in investigation and possible disciplinary action, up to revocation of Petitioner's license(s).
7. 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

I. REINSTATEMENT OF LICENSURE AND APPLICABILITY

IT IS THEREFORE AGREED and ORDERED, subject to ratification by the Texas Board of Nursing, that the petition of MEREDITH NEAL GRAY for reinstatement of license to practice nursing in the State of Texas be **GRANTED** and Registered Nurse License Number 786229 is/are hereby **REINSTATED** in accordance with the terms of this Order.

- A. PETITIONER SHALL submit an application for licensure renewal/reactivation, as applicable, and pay all re-registration fees, if any, and PETITIONER'S licensure status in the State of Texas will be activated and updated to current status and to reflect the applicable conditions outlined herein.
- B. Until successfully completed, this Order SHALL apply to any and all future licenses issued to PETITIONER to practice nursing in the State of Texas.
- C. Until successfully completed, this Order SHALL be applicable to PETITIONER'S nurse licensure compact privileges, if any, to practice nursing in the State of Texas.
- D. Until successfully completed, PETITIONER may not practice nursing in the State of Texas except in accordance with the terms of this Order.
- E. As a result of this Order, PETITIONER'S license(s) will be designated "single state" as applicable and PETITIONER may not work outside the State of Texas in another nurse licensure compact party state using a Texas compact license.

II. COMPLIANCE WITH LAW

While under the terms of this Order, PETITIONER agrees to comply in all respects with the Nursing Practice Act, Texas Occupations Code, §§301.001 *et seq.*, the Rules and Regulations Relating to Nursing Education, Licensure and Practice, 22 TEX. ADMIN. CODE §§211.1 *et seq.*, and this Reinstatement Agreed Order.

III. PEER ASSISTANCE PROGRAM REQUIREMENTS

IT IS FURTHER AGREED and ORDERED that PETITIONER SHALL comply with the following conditions for such a time as is required for PETITIONER to successfully complete the **Texas Peer Assistance Program for Nurses (TPAPN)**:

- A. **Within forty-five (45) days** following the date of relicensure, PETITIONER SHALL apply to TPAPN.
- B. **Within ninety (90) days** following the date of relicensure, PETITIONER SHALL sign and execute the TPAPN participation agreement and complete the enrollment process, which SHALL include payment of a non-refundable participation fee payable to TPAPN in the amount of five hundred dollars (\$500.00), if licensed as

a registered nurse, or in the amount of three hundred fifty dollars (\$350.00), if licensed as a vocational nurse.

- C. Upon acceptance into the TPAPN, PETITIONER SHALL **waive confidentiality and provide a copy of the executed TPAPN participation agreement to the Texas Board of Nursing.**
- D. PETITIONER SHALL **comply with all requirements of the TPAPN participation agreement** during its term and SHALL keep all applicable license(s) to practice nursing in the State of Texas in current status.
- E. PETITIONER SHALL CAUSE the TPAPN to **notify the Texas Board of Nursing of any violation of the TPAPN participation agreement.**

IV. **REMEDIAL EDUCATION COURSE(S)**

In addition to any continuing education requirements the Board may require for licensure renewal, PETITIONER SHALL successfully complete the following remedial education course(s) **within one (1) year of relicensure, unless otherwise specifically indicated:**

- A. **A Board-approved course in Texas nursing jurisprudence and ethics** that shall be a minimum of six (6) hours in length. The course's content shall include the Nursing Practice Act, standards of practice, documentation of care, principles of nursing ethics, confidentiality, professional boundaries, and the Board's Disciplinary Sanction Policies regarding: Sexual Misconduct; Fraud, Theft, and Deception; Nurses with Substance Abuse, Misuse, Substance Dependency, or other Substance Use Disorder; and Lying and Falsification. Courses focusing on malpractice issues will not be accepted. Home study and video programs will not be approved.

In order to receive credit for completion of this/these course(s), PETITIONER SHALL CAUSE the instructor to submit a Verification of Course Completion form or SHALL submit the continuing education certificate, as applicable, to the attention of Monitoring at the Board's office. PETITIONER SHALL first obtain Board approval of any course prior to enrollment if the course is not being offered by a pre-approved provider. *Information about Board-approved courses and Verification of Course Completion forms are available from the Board at www.bon.texas.gov/compliance.*

V. **EFFECT OF NONCOMPLIANCE**

SHOULD PETITIONER fail to comply with this Order or the terms of the participation agreement with the TPAPN, such noncompliance will result in further disciplinary action including TEMPORARY SUSPENSION pursuant to Section 301.4551, Texas Occupations Code, or REVOCATION of PETITIONER'S license(s) and nurse licensure compact privileges, if any, to practice nursing in the State of Texas.

VI. RESTORATION OF UNENCUMBERED LICENSE(S)

Upon full compliance with the terms of this Reinstatement Agreed Order, all encumbrances will be removed from PETITIONER'S license(s) and/or privilege(s) to practice nursing in the State of Texas and, subject to meeting all existing eligibility requirements in Texas Occupations Code Chapter 304, Article III, PETITIONER may be eligible for nurse licensure compact privileges, if any.

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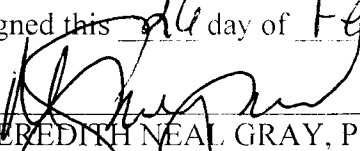
CONTINUED ON NEXT PAGE.

PETITIONER'S CERTIFICATION

I understand this Order is conditioned upon the accuracy and completeness of my petition and disclosures. I further understand that subsequently discovered discrepancies in my petition and/or disclosures will result in investigation and possible disciplinary action, up to revocation of my license(s).

I have reviewed this Order. I understand that I have the right to legal counsel prior to signing this Order. I waive representation by counsel. By my signature on this Order, I agree to the Findings of Fact, Conclusions of Law, Order, and any conditions of said Order.

I do acknowledge possessing a diagnosis that deems me eligible to participate in the Texas Peer Assistance Program for Nurses. I waive judicial review of this Order. I understand that this Order is subject to ratification by the Board. When this Order is ratified, the terms of this Order become effective, and a copy will be mailed to me. I agree to inform the Board of any other fact or event that could constitute a ground for denial of licensure prior to reinstating my license(s) to practice nursing in the state of Texas. 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 TEMPORARY SUSPENSION pursuant to Section 301.4551, Texas Occupations Code, and/or REVOCATION of my license(s) and/or nurse licensure compact privileges, if any, to practice nursing in the State of Texas, as a consequence of my noncompliance.

Signed this 26 day of February, 2024


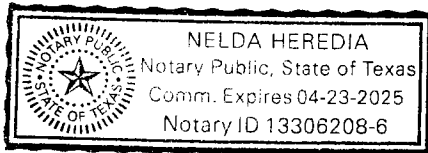
MEREDITH NEAL GRAY, PETITIONER

Sworn to and subscribed before me this 26 day of February, 2024.

SEAL

Nelda Heredia

Notary Public in and for the State of Texas



WHEREFORE, PREMISES CONSIDERED, the Texas Board of Nursing does hereby ratify and adopt the Reinstatement Agreed Order that was signed on the 26th day of February, 2024, by MEREDITH NEAL GRAY, Registered Nurse License Number 786229, and said Reinstatement Agreed Order is final.

Effective this 18th day of April, 2024.

Kristin K. Benton, DNP, RN

Kristin K. Benton, DNP, RN
Executive Director on behalf
of said Board



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
Stephanie Johnson
Executive Director of the Board

**In the Matter of
Permanent Registered Nurse
License Number 786229
Issued to MEREDITH NEAL GRAY,
Respondent**

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

ORDER OF THE BOARD

TO: Meredith Gray
3201 65th Street
Unit A
Lubbock, TX 79413

During open meeting held in Austin, Texas, on August 2, 2022, 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 786229, previously issued to MEREDITH NEAL GRAY to practice nursing in the State of Texas be, and the same is/are hereby, REVOKED.

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

Entered this 2nd day of August, 2022

TEXAS BOARD OF NURSING

BY: 

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

Attachment: Formal Charges filed December 1, 2021

d17r(2022.07.13)

Re: Permanent Registered Nurse License Number 786229
Issued to MEREDITH NEAL GRAY
DEFAULT ORDER - REVOKE

CERTIFICATE OF SERVICE

I hereby certify that on the 3RD day of August, 2022, 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,

Copy Via USPS First Class Mail

Meredith Gray
3201 65th Street
Unit A
Lubbock, TX 79413

Copy Via USPS First Class Mail

Meredith Neal Gray
4404 Elkhart Ave Unit A
Lubbock, TX 79414

Meredith Neal Gray
1230 N. LBJ Dr. #112
San Marcos, Texas 78666

Meredith Neal Gray
160 Kid Ranch Lane
San Marcos, TX 78666

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 786229 §
Issued to MEREDITH NEAL GRAY, § **BOARD OF NURSING**
Respondent §

FORMAL CHARGES

This is a disciplinary proceeding under Section 301.452(b), Texas Occupations Code. Respondent, MEREDITH NEAL GRAY, is a Registered Nurse holding license number 786229 which is in current 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 August 13, 2021, while licensed as a Registered Nurse with the state of Texas, and while participating in the Texas Peer Assistance Program for Nurses (TPAPN) Extended Evaluation Program (EEP), Respondent engaged in the intemperate use of Methamphetamine and Amphetamine in that she submitted a specimen that resulted positive for Methamphetamine and Amphetamine. As a result of her positive screen for Methamphetamine and Amphetamine, Respondent's EEP case was closed and referred back to the Texas Board of Nursing. Additionally, Respondent admitted to using illegal substances. Respondent's condition could have affected her ability to recognize subtle signs, symptoms or changes in conditions, and could have affected her ability to make rational, accurate and appropriate assessments, judgements and decisions regarding patient care, thereby placing patients 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 §217.11(1)(A)&(1)(B), and 22 TEX. ADMIN. CODE §217.12(1)(A),(1)(B),(4),(5),(9),(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) and/or privilege(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.

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.

NOTICE IS GIVEN that, based on the Formal Charges, the Board will rely on adopted policies related to Substance Use Disorders and Other Alcohol and Drug Related Conduct, which can be found under the "Discipline & Complaints; Board Policies & Guidelines" section of the Board's website, 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.

NOTICE IS ALSO GIVEN that Respondent's past disciplinary history, as set out below and described in the Order(s) which is/are attached and incorporated by reference as part of these charges, will be offered in support of the disposition recommended by staff: Order(s) of the Board dated October 18, 2012.

Filed this 1st day of December, 2021.

TEXAS BOARD OF NURSING



James W. Johnston, General Counsel
Board Certified - Administrative Law
Texas Board of Legal Specialization
State Bar No. 10838300

Jena Abel, Deputy General Counsel
Board Certified - Administrative Law
Texas Board of Legal Specialization
State Bar No. 24036103

Brian L. Miller, Jr., Assistant General Counsel
State Bar No. 24117478

JoAnna Starr, Assistant General Counsel
State Bar No. 24098463

Jacqueline A. Strashun, Assistant General Counsel
State Bar No. 19358600

John Vanderford, Assistant General Counsel
State Bar No. 24086670

333 Guadalupe, Tower III, Suite 460
Austin, Texas 78701

P: (512) 305-8657

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

Attachment(s): Order(s) of the Board dated October 18, 2012.
D(2021.11.15)



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
Katherine A. Thomas
Executive Director of the Board

BEFORE THE TEXAS BOARD OF NURSING

In the Matter of Registered Nurse License Number 786229 issued to MEREDITH NEAL GRAY § AGREED § ORDER

On this day the Texas Board of Nursing, hereinafter referred to as the Board, considered the matter MEREDITH NEAL GRAY, Registered Nurse License Number 786229, 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)(9),(10)&(12) Texas Occupations Code. Respondent waived informal proceedings, notice and hearing, and agreed to the entry of this Order offered on June 27, 2012, by Katherine A. Thomas, MN, RN, FAAN, Executive Director, subject to ratification by the Board.

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 informal proceedings, notice and hearing, and agreed to the entry of this Order.
3. Respondent is currently licensed to practice professional nursing in the State of Texas.
4. Respondent received an Associate Degree in Nursing from Salt Lake Community College, Salt Lake City, Utah on December 17, 1998. Respondent was licensed to practice professional nursing in the State of Texas on June 21, 2010.
5. Respondent's professional nursing employment history includes:

03/98 - 05/00 RN Intermountain Health Care Salt Lake City, Utah

Respondent's professional nursing employment history continued:

| | | |
|-----------------|----|---------------------------------------------------------------|
| 05/00 - 03/01 | RN | American Mobile Healthcare San Diego, California |
| 03/01 - 09/02 | RN | Intermountain Health Care Salt Lake City, Utah |
| 09/02 - 08/03 | RN | Eagle Air Med Blanding, Utah |
| 08/03 - 12/04 | RN | St. Rose Dominican Hospital Henderson, Nevada |
| 01/05 - 05/05 | RN | McAllen Medical Center McAllen, Texas |
| 06/05 - 07/06 | RN | Fastaff- Summerlin Hospital Las Vegas, Nevada |
| 07/06 - 07/09 | RN | Summerlin Hospital (UHS) Las Vegas, Nevada |
| 08/09 - 02/11 | RN | Spring Branch Medical Center (HCA, Inc.) Houston, Texas |
| 02/11 - 01/12 | RN | Conroe Regional Medical Center Conroe, Texas |
| 02/12 - Present | RN | Westlake Health and Wellness Center Houston, Texas |

6. At the time of the initial incident, Respondent was employed as an Emergency Department Manager with Conroe Regional Medical Center, Conroe, Texas, and had been in this position for eight (8) months.
7. On or about October 2011 through December 19, 2011, while employed with Conroe Regional Medical Center, Conroe, Texas, Respondent may have lacked fitness to practice professional nursing due to exhibiting impaired behavior, including but not limited to falling asleep while on duty on numerous occasions. Respondent's condition could have affected her ability to recognize subtle signs, symptoms or changes in patients' conditions, and could have affected her ability to make rational, accurate, and appropriate assessments, judgments, and decisions regarding patient care, thereby placing the patients in potential danger.

8. On or about December 19, 2011, while employed with Conroe Regional Medical Center, Conroe, Texas, Respondent engaged in the intemperate use of Carisoprodol/Meprobamate (Soma) in that she produced a specimen for a drug screen which tested positive for Carisoprodol/Meprobamate (Soma). Unlawful possession of Soma is prohibited by Chapter 481 of the Texas Health & Safety Code (Controlled Substances Act). The use of Soma 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.
9. Regarding the conduct outlined in Finding of Fact Number Seven (7), Respondent states that she was made aware of only two incidents in which she allegedly fell asleep during her shift. She states that one of the incidents occurred in either October or November of 2011, and the second on or about December 13, 2011, when she was reprimanded by her employer for intermittently and briefly nodding off during staff meetings. Respondent states that in January of 2012 she sought an evaluation by David Michalak, M.D., which resulted in a diagnosis of Narcolepsy. Regarding the conduct outlined in Finding of Fact Number Eight (8), Respondent denies purposefully ingesting the medication and her only explanation is that she accidentally ingested her husband's prescription Soma.
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 to prove violation(s) of 22 TEX. ADMIN. CODE §217.12(5),(10)(A)(D)&(11)(B).
4. The evidence received is sufficient cause pursuant to Section 301.452(b)(9),(10)&(12) Texas Occupations Code, to take disciplinary action against MEREDITH NEAL GRAY, Registered Nurse License Number 786229, including revocation of Respondent's license to practice nursing in the State of Texas.

ORDER

IT IS THEREFORE AGREED and ORDERED, subject to ratification by the Texas Board of Nursing, that RESPONDENT SHALL receive the sanction of WARNING WITH STIPULATIONS, and RESPONDENT SHALL comply in all respects with the Nursing Practice Act, Texas Occupations Code, §§301.001 *et seq.*, the Rules and Regulations Relating to Nurse Education, Licensure and Practice, 22 TEX. ADMIN. CODE §211.1 *et seq.* and this Order.

IT IS FURTHER AGREED and ORDERED that, while under the terms of this Order, this Order SHALL apply to any and all future licenses issued to Respondent to practice nursing in the State of Texas.

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.

IT IS FURTHER AGREED and ORDERED that while Respondent's license(s) is/are encumbered by this Order, Respondent may not work outside the State of Texas pursuant to a nurse licensure compact privilege without the written permission of the Texas Board of Nursing and the Board of Nursing in the party state where Respondent wishes to work.

IT IS FURTHER AGREED that:

(1) RESPONDENT SHALL, within one (1) year of entry of this Order, successfully complete a course in Texas nursing jurisprudence and ethics. RESPONDENT SHALL obtain Board approval of the course prior to enrollment only if the course is not being offered by a pre-approved provider. Home study courses and video programs will not be approved. In order for the course to be approved, the target audience shall include nurses. It shall be a minimum of six (6) hours in length. The course's content shall include the Nursing Practice Act, standards of practice,

documentation of care, principles of nursing ethics, confidentiality, professional boundaries, and the Board's Disciplinary Sanction Policies regarding: Sexual Misconduct; Fraud, Theft and Deception; Nurses with Substance Abuse, Misuse, Substance Dependency, or other Substance Use Disorder; and Lying and Falsification. Courses focusing on malpractice issues will not be accepted. RESPONDENT SHALL CAUSE the sponsoring institution to submit a Verification of Course Completion form, provided by the Board, to the Office of the Board to verify RESPONDENT'S successful completion of the course. This course shall be taken in addition to any other courses stipulated in this Order, if any, and in addition to any continuing education requirements the Board has for relicensure. *Board-approved courses may be found at the following Board website address:* <http://www.bon.texas.gov/disciplinaryaction/stipscourses.html>.

(2) RESPONDENT SHALL, within one (1) year of entry of this Order, successfully complete the course "Sharpening Critical Thinking Skills," a 3.6 contact hour online program provided by the National Council of State Boards of Nursing (NCSBN) Learning Extension. In order to receive credit for completion of this program, RESPONDENT SHALL SUBMIT the continuing education certificate of completion for this program to the Board's office, to the attention of Monitoring. This course is to be taken in addition to any continuing education requirements the Board may have for relicensure. *Board-approved courses may be found at the following Board website address:* <http://www.bon.texas.gov/disciplinaryaction/stipscourses.html>.

IT IS FURTHER AGREED, SHOULD RESPONDENT PRACTICE AS A NURSE IN THE STATE OF TEXAS, RESPONDENT WILL PROVIDE DIRECT PATIENT CARE AND PRACTICE IN A HOSPITAL, NURSING HOME, OR OTHER CLINICAL SETTING AND RESPONDENT MUST WORK IN SUCH SETTING A MINIMUM OF SIXTY-FOUR (64) HOURS PER MONTH UNDER THE FOLLOWING STIPULATIONS FOR ONE (1) YEAR

OF EMPLOYMENT. THE LENGTH OF THE STIPULATION PERIOD WILL BE EXTENDED UNTIL SUCH TWELVE (12) MONTHS HAVE ELAPSED. PERIODS OF UNEMPLOYMENT OR OF EMPLOYMENT THAT DO NOT REQUIRE THE USE OF A REGISTERED NURSE (RN) OR A VOCATIONAL NURSE (LVN) LICENSE, AS APPROPRIATE, WILL NOT APPLY TO THIS STIPULATION PERIOD:

(3) RESPONDENT SHALL notify each present employer in nursing of this Order of the Board and the stipulations on RESPONDENT'S license(s). RESPONDENT SHALL present a complete copy of this Order and all Proposals for Decision issued by the Administrative Law Judge, if any, to each present employer within five (5) days of receipt of this Order. RESPONDENT SHALL notify all future employers in nursing of this Order of the Board and the stipulations on RESPONDENT'S license(s). RESPONDENT SHALL present a complete copy of this Order and all Proposals for Decision issued by the Administrative Law Judge, if any, to each future employer prior to accepting an offer of employment.

(4) RESPONDENT SHALL CAUSE each present employer in nursing to submit the Notification of Employment form, which is provided to the Respondent by the Board, to the Board's office within ten (10) days of receipt of this Order. RESPONDENT SHALL CAUSE each future employer to submit the Notification of Employment form, which is provided to the Respondent by the Board, to the Board's office within five (5) days of employment as a nurse.

(5) RESPONDENT SHALL be supervised by a Registered Nurse, if licensed as a Registered Nurse, or by a Licensed Vocational Nurse or a Registered Nurse, if licensed as a Licensed Vocational Nurse, who is on the premises. The supervising nurse is not required to be on the same unit or ward as RESPONDENT, but should be on the facility grounds and readily available to provide assistance and intervention if necessary. The supervising nurse shall have a minimum of

two (2) years experience in the same or similar practice setting to which the Respondent is currently working. RESPONDENT SHALL work only regularly assigned, identified and predetermined unit(s). RESPONDENT SHALL NOT be employed by a nurse registry, temporary nurse employment agency, hospice, or home health agency. RESPONDENT SHALL NOT be self-employed or contract for services. Multiple employers are prohibited.

(6) RESPONDENT SHALL CAUSE each employer to submit, on forms provided to the Respondent by the Board, periodic reports as to RESPONDENT'S capability to practice nursing. These reports shall be completed by the nurse who supervises the RESPONDENT. These reports shall be submitted by the supervising nurse to the office of the Board at the end of each three (3) month period for one (1) year(s) of employment as a nurse.

(7) RESPONDENT SHALL abstain from the consumption of alcohol, Nubain, Stadol, Dalgan, Ultram, or other synthetic opiates, and/or the use of controlled substances, except as prescribed by a licensed practitioner for a legitimate purpose. If prescribed, RESPONDENT SHALL CAUSE the licensed practitioner to submit a written report identifying the medication, dosage and the date the medication was prescribed. The report shall be submitted directly to the office of the Board by the prescribing practitioner, within ten (10) days of the date of the prescription. **In the event that prescriptions for controlled substances are required for periods of two (2) weeks or longer, the Board may require and RESPONDENT SHALL submit to a pain management and/or chemical dependency evaluation by a Board approved evaluator. The performing evaluator must submit a written report meeting the Board's requirements to the Board's office within thirty (30) days from the Board's request.**

(8) RESPONDENT SHALL submit to random periodic screens for controlled substances, tramadol hydrochloride (Ultram), and alcohol. For the first three (3) month period, random screens shall be performed at least once per week. For the next three (3) month period,

random screens shall be performed at least twice per month. For the next six (6) month period, random screens shall be performed at least once per month. For the remainder of the stipulation/probation period, random screens shall be performed at least once every three (3) months. All random screens SHALL BE conducted through urinalysis. Screens obtained through urinalysis are the sole method accepted by the Board.

Specimens shall be screened for at least the following substances:

| | |
|---------------------------------|---------------|
| Amphetamines | Meperidine |
| Barbiturates | Methadone |
| Benzodiazepines | Methaqualone |
| Cannabinoids | Opiates |
| Cocaine | Phencyclidine |
| Ethanol | Propoxyphene |
| tramadol hydrochloride (Ultram) | |

A Board representative may appear at the RESPONDENT'S place of employment at any time during the stipulation period and require RESPONDENT to produce a specimen for screening.

All screens shall be properly monitored and produced in accordance with the Board's policy on Random Drug Testing. A complete chain of custody shall be maintained for each specimen obtained and analyzed. RESPONDENT SHALL be responsible for the costs of all random drug screening during the stipulation period.

Any positive result for which the nurse does not have a valid prescription or failure to report for a drug screen, which may be considered the same as a positive result, will be regarded as non-compliance with the terms of this Order and may subject the nurse to further disciplinary action including EMERGENCY SUSPENSION pursuant to Section 301.4551, Texas Occupations Code, or REVOCATION of Respondent's license(s) and nurse licensure compact privileges, if any, to practice nursing in the State of Texas.

IT IS FURTHER AGREED, that upon full compliance with the terms of this Order, all encumbrances will be removed from RESPONDENT'S license(s) to practice nursing in the State

of Texas and RESPONDENT shall be eligible for nurse licensure compact privileges, if any.

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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 Agreed Order. 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 Findings of Fact, Conclusions of Law, 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 is subject to ratification by the Board. When this Order is ratified, the terms of this Order become effective, 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 revocation of my license(s) to practice nursing in the State of Texas, as a consequence of my noncompliance.

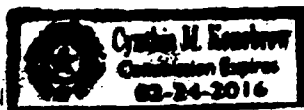
Signed this 24 day of August, 2012.


MEREDITH NEAL GRAY, RESPONDENT

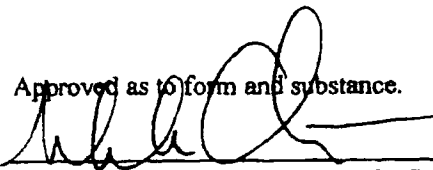
Sworn to and subscribed before me this 24th day of August, 2012

SEAL


Notary Public in and for the State of Texas



Approved as to form and substance.


Michele Quattlebaum, Attorney for Respondent

Signed this 27 day of AUGUST, 2012

WHEREFORE, PREMISES CONSIDERED, the Texas Board of Nursing does hereby ratify and adopt the Agreed Order that was signed on the 24th day of August, 2012, by MEREDITH NEAL GRAY, Registered Nurse License Number 786229, and said Order is final.

Effective this 18th day of October, 2012.



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

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

REGISTERED NURSING PROGRAM

Louise R. Bailey M.Ed., RN
Louise R. Bailey, M. Ed., RN



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

In the Matter of the Accusation Against:
**MEREDITH NEAL, AKA MEREDITH
NEAL GRAY**
8496 South Monroe Street
Midvale, UT 84047
Registered Nurse License No. 568458
Respondent.

Case No. 2014-12

DEFAULT DECISION AND ORDER

[Gov. Code, §11520]

FINDINGS OF FACT

1. On or about July 7, 2013, Complainant Louise R. Bailey, M.Ed., RN, in her official capacity as the Executive Officer of the Board of Registered Nursing, Department of Consumer Affairs, filed Accusation No. 2014-12 against Meredith Neal, aka Meredith Neal Gray (Respondent) before the Board of Registered Nursing. (Accusation attached as Exhibit A.)
2. On or about July 14, 2000, the Board of Registered Nursing (Board) issued Registered Nurse License No. 568458 to Respondent. The Registered Nurse License expired on September 30, 2001, and has not been renewed.
3. On or about July 7, 2013, Respondent was served by Certified and First Class Mail copies of the Accusation No. 2014-12, Statement to Respondent, Notice of Defense, Request for

1 Discovery, and Discovery Statutes (Government Code sections 11507.5, 11507.6, and 11507.7) at
2 Respondent's address of record which, pursuant to California Code of Regulations, title 16,
3 section 1409.1, is required to be reported and maintained with the Board, which is 8496 South
4 Monroe Street Midvale, UT 84047. On August 9, 2013 Respondent was served by Certified and
5 First Class Mail copies of the Accusation No. 2014-12, Statement to Respondent, Notice of
6 Defense, Request for Discovery, and Discovery Statutes (Government Code sections 11507.5,
7 11507.6, and 11507.7) at her alternate address, 5015 Louetta Road, Apt. 623, Spring, TX 77379.

8 4. Service of the Accusation was effective as a matter of law under the provisions of
9 Government Code section 11505, subdivision (c) and/or Business & Professions Code section
10 124.

11 5. On or about July 31, 2013, the aforementioned documents were returned by the U.S.
12 Postal Service marked "Unclaimed" at her address of record, 8496 South Monroe Street Midvale,
13 UT 84047, however, on or about August 26, 2013, the domestic return receipt was signed for at
14 Respondent's alternate address, 5015 Louetta Road, Apt. 623, Spring, TX 77379.

15 6. Government Code section 11506 states, in pertinent part:

16 (c) The respondent shall be entitled to a hearing on the merits if the respondent
17 files a notice of defense, and the notice shall be deemed a specific denial of all parts
18 of the accusation not expressly admitted. Failure to file a notice of defense shall
19 constitute a waiver of respondent's right to a hearing, but the agency in its discretion
20 may nevertheless grant a hearing.

21 7. Respondent failed to file a Notice of Defense within 15 days after service upon her of
22 the Accusation, and therefore waived her right to a hearing on the merits of Accusation No. 2014-
23 12.

24 8. California Government Code section 11520 states, in pertinent part:

25 (a) If the respondent either fails to file a notice of defense or to appear at the
26 hearing, the agency may take action based upon the respondent's express admissions
27 or upon other evidence and affidavits may be used as evidence without any notice to
28 respondent.

9. Pursuant to its authority under Government Code section 11520, the Board finds
Respondent is in default. The Board will take action without further hearing and, based on the
relevant evidence contained in the Default Decision Evidence Packet in this matter, as well as

1 taking official notice of all the investigatory reports, exhibits and statements contained therein on
2 file at the Board's offices regarding the allegations contained in Accusation No. 2014-12, finds
3 that the charges and allegations in Accusation No. 2014-12, are separately and severally, found to
4 be true and correct by clear and convincing evidence.

5 10. Taking official notice of its own internal records, pursuant to Business and
6 Professions Code section 125.3, it is hereby determined that the reasonable costs for Investigation
7 and Enforcement is \$787.50 as of September 11, 2013.

8 DETERMINATION OF ISSUES

9 1. Based on the foregoing findings of fact, Respondent Meredith Neal, aka Meredith
10 Neal Gray has subjected her Registered Nurse License No. 568458 to discipline.

11 2. The agency has jurisdiction to adjudicate this case by default.

12 3. The Board of Registered Nursing is authorized to revoke Respondent's Registered
13 Nurse License based upon the following violations alleged in the Accusation which are supported
14 by the evidence contained in the Default Decision Evidence Packet in this case.:

15 a. On August 27, 2012, pursuant to TOC section 301.451-301.555, the Disciplinary
16 Committee of the Texas Board took a disciplinary action against Respondent's registered nurse
17 license in a matter entitled, *In the Matter of Registered Nurse License Number 786229 Issued to*
18 *Meredith Neal Gray*, by offering an Agreed Order, which Respondent accepted through a
19 certification sanctioning a Warning with Stipulations against her registered nurse license in the
20 State of Texas.

Exhibit A

Accusation

1 KAMALA D. HARRIS
Attorney General of California
2 ALFREDO TERRAZAS
Senior Assistant Attorney General
3 LINDA K. SCHNEIDER
Supervising Deputy Attorney General
4 State Bar No. 101336
110 West "A" Street, Suite 1100
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
Telephone: (619) 645-3037
7 Facsimile: (619) 645-2061
Attorneys for Complainant

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

11
12 In the Matter of the Accusation Against:

Case No. *2014-12*

13 **MEREDITH NEAL,**
AKA MEREDITH NEAL GRAY
14 **8496 South Monroe Street**
Midvale, UT 84047

ACCUSATION

15 **Registered Nurse License No. 568458**

16 Respondent.

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19 Complainant alleges:

20 **PARTIES**

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

24 2. On July 14, 2000, the Board of Registered Nursing issued Registered Nurse
25 License Number 568458 to Meredith Neal, also known as Meredith Neal Gray (Respondent).
26 The Registered Nurse License expired on September 30, 2001, and has not been renewed.

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JURISDICTION

3. This Accusation is brought before the Board, under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

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

5. Section 2764 of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811, subdivision (b) of the Code, the Board may renew an expired license at any time.

6. Section 2811, subdivision (b) of the Code states:

Each such license not renewed in accordance with this section shall expire but may within a period of eight years thereafter be reinstated upon payment of the biennial renewal fee and penalty fee required by this chapter and upon submission of such proof of the applicant's qualifications as may be required by the board, except that during such eight-year period no examination shall be required as a condition for the reinstatement of any such expired license which has lapsed solely by reason of nonpayment of the renewal fee. After the expiration of such eight-year period the board may require as a condition of reinstatement that the applicant pass such examination as it deems necessary to determine his present fitness to resume the practice of professional nursing.

STATUTORY PROVISIONS

7. Section 2761 of the Code states:

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

(a) Unprofessional conduct, which includes, but is not limited to, the following:

(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action against a health care professional license or certificate by another state or territory of the United States, by any other government agency, or by another California health care professional licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that action.

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1 **COST RECOVERY**

2 8. Section 125.3 of the Code provides, in pertinent part, that the Board may request
3 the administrative law judge to direct a licentiate found to have committed a violation or
4 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation
5 and enforcement of the case, with failure of the licentiate to comply subjecting the license to not
6 being renewed or reinstated. If a case settles, recovery of investigation and enforcement costs
7 may be included in a stipulated settlement.

8 **DRUG AT ISSUE**

9 9. Carisoprodol, also known as Soma, is a dangerous drug as designated by Code
10 section 4022, subdivision (c), with the active ingredient Meprobamate, a Schedule IV controlled
11 substance under Health and Safety Code section 11057, subdivision (d)(18).

12 **CAUSE FOR DISCIPLINE**

13 **(Out of State Discipline)**

14 10. Respondent has subjected her Registered Nurse License to disciplinary action
15 under Code section 2761, subdivision (a)(4), in that her Texas registered nurse license was
16 disciplined by the State of Texas Board of Nursing (Texas Board). The circumstances are as
17 follows.

18 11. On June 21, 2010, the Texas Board issued Registered Nurse License number
19 786229 to Respondent to practice professional nursing in the State of Texas. The Texas
20 Registered Nurse License will expire on August 31, 2014, unless renewed.

21 12. On August 27, 2012, pursuant to TOC section 301.451-301.555, the Disciplinary
22 Committee of the Texas Board took a disciplinary action against Respondent's registered nurse
23 license in a matter entitled, *In the Matter of Registered Nurse License Number 786229 Issued to*
24 *Meredith Neal Gray*, by offering an Agreed Order, which Respondent accepted through a
25 certification sanctioning a Warning with Stipulations against her registered nurse license in the
26 State of Texas.

27 13. The facts that led to the discipline are that in October through December, 19,
28 2011, while utilizing the Registered Nurse License issued by the Texas Board, and employed as

1 an Emergency Department Manager for eight months with Conroe Regional Medical Center in
2 Conroe, Texas, Respondent lacked fitness to practice professional nursing due to impairment.

3 a. On December 19, 2011, Respondent engaged in the intemperate use of
4 Soma in that she produced a specimen for a drug screen that tested positive for Carisoprodol/
5 Meprobamate, in violation of Chapter 481 of the Texas Health and Safety Code.

6 b. In October or November 2011 and on December 13, 2011, Respondent
7 intermittently and briefly nodded off during staff meetings.

8 14. On June 27, 2012, the Executive Director of the Texas Board received sufficient
9 evidence to prove Respondent's violation of TOC section 301.452, subdivisions (b)(9), (b)(10)
10 and (b)(12), and title 22 Texas Administrative Code (TAC) section 217.12, subdivisions (5),
11 (10)(A), (10)(D), and (11)(H), finding that Respondent placed her patients in potential danger
12 due to her condition that affected her ability to recognize subtle signs, symptoms or changes in
13 patients' conditions, make rational, accurate, and appropriate assessments, judgments, and
14 decisions regarding patient care.

15 15. On October 18, 2012, the Texas Board ratified and adopted the Agreed Order as
16 its order in resolution of the disciplinary action. In the Order, Respondent's license to practice as
17 a registered nurse in the State of Texas and her nurse licensure compact privileges, were
18 sanctioned with a warning and subjected to stipulations. While her license was encumbered,
19 Respondent was required to comply within one year of the Order to successfully complete
20 courses in Texas nursing jurisprudence and ethics, and Sharpening Critical Thinking Skills, pay a
21 fine of five hundred dollars, notify each present employer in nursing of the Order, cause each
22 present employer in nursing to submit the Notification of Employment form, be supervised by a
23 Registered Nurse, cause each employer to submit periodic reports as to Respondent's capability
24 to practice nursing, abstain from the consumption of alcohol and synthetic opiates, and the use of
25 controlled substances, except as prescribed, and submit to random periodic screens for controlled
26 substances, tramadol hydrochloride, and alcohol.

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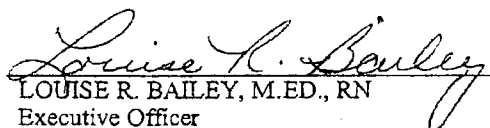
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PRAYER

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

1. Revoking or suspending Registered Nurse License Number 568458, issued to Meredith Neal, also known as Meredith Neal Gray;
2. Ordering Meredith Neal to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;
3. Taking such other and further action as deemed necessary and proper.

DATED: July 7, 2013


LOUISE R. BAILEY, M.ED., RN
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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