

**BEFORE THE VIRGINIA BOARD OF NURSING**

**IN RE:           ANGELA LORRAINE RICHARDSON, L.P.N., R.N. APPLICANT**  
**L.P.N. License Number: 0002-078069**  
**L.P.N. Expiration Date:     August 31, 2018**  
**Case Number:             181402, 178176**

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**NOTICE OF INFORMAL CONFERENCE  
AND STATEMENT OF ALLEGATIONS**

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**You are hereby notified that an Informal Conference has been scheduled before the Board of Nursing ("Board") regarding your application for licensure to practice professional nursing in the Commonwealth of Virginia and regarding your license to practice practical nursing in the Commonwealth of Virginia.**

<b>TYPE OF PROCEEDING:</b>	This is an informal conference before a Special Conference Committee ("Committee") of the Board.
<b>DATE AND TIME:</b>	<b>August 21, 2017</b> 10:30 A.M.
<b>PLACE:</b>	Virginia Department of Health Professions Perimeter Center - 9960 Mayland Drive 2 <sup>nd</sup> Floor - Virginia Conference Center Henrico, Virginia 23233

**LEGAL AUTHORITY AND JURISDICTION:**

1. This informal conference is being held pursuant to Virginia Code §§ 2.2-4019 and 54.1-2400(10). This proceeding will be convened as a public meeting pursuant to Virginia Code § 2.2-3700.
2. The burden rests on you, as the applicant, to demonstrate that you meet the requirements of Virginia Code § 54.1 3017.
3. In considering your application, the Committee will consider evidence that grounds exist to refuse to issue you a license to practice professional nursing, as more fully set out in the enclosed Statement of Allegations.
4. At the conclusion of the proceeding, the Committee is authorized to take any of the following actions with respect to your application for licensure to practice professional nursing:
  - Approve your application and issue an unrestricted license to practice professional nursing.
  - Approve your application and issue a reprimand, a monetary penalty, and/or a restricted license subject to terms and conditions.

- Deny your application;
  - Refer the matter to the Board for a formal administrative hearing.
5. At the conclusion of the proceeding, the Committee is authorized to take any of the following actions with respect to your license to practice practical nursing:
- Exonerate you;
  - Reprimand you;
  - Require you to pay a monetary penalty;
  - Place you on probation and/or under terms and conditions;
  - Refer the matter to the Board of Nursing for a formal administrative hearing; or
  - Offer you a consent order for suspension or revocation of you license in lieu of a formal hearing.

#### **ABSENCE OF APPLICANT AND APPLICANT'S COUNSEL:**

If you fail to appear at the informal conference, the Committee may proceed to hear this matter in your absence and may take any of the actions outlined above.

#### **APPLICANT'S LEGAL RIGHTS:**

You have the right to the information on which the Committee will rely in making its decision, to be represented by counsel at this proceeding, to subpoena witnesses and/or documents, and to present relevant evidence on your behalf.

#### **INFORMAL CONFERENCE MATERIALS:**

Enclosed is a copy of the documents that will be distributed to the members of the Committee and will be considered by the Committee when discussing any allegations with you and when deliberating on your case. **These documents are enclosed only with the notice sent by certified mail, which you may be required to claim at the post office. Please bring these documents with you to the informal conference.**

#### **FILING DEADLINES:**

Deadline for filing materials: **August 14, 2017**. Submit 5 copies of all documents you want the Board to consider to Brenda Krohn, Board of Nursing, 9960 Mayland Drive, Suite 300, Henrico, Virginia 23233. Exhibits may not be sent by facsimile or e-mail.

## REQUEST FOR A CONTINUANCE

Absent exigent circumstances, such as personal or family illness, a request for a continuance after **August 14, 2017**, will not be considered. If you obtain counsel, you should do so as soon as possible, as a motion for a continuance due to the unavailability of counsel will not be considered unless received by **August 14, 2017**.

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**STATEMENT OF ALLEGATIONS**

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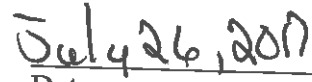
The Board alleges that at all times relevant hereto Angela Lorraine Richardson, L.P.N., was licensed to practice practical nursing in the Commonwealth of Virginia and that grounds exist to refuse to issue a license to Angela Lorraine Richardson, L.P.N. to practice professional nursing in that:

1. Ms. Richardson violated Virginia Code § 54.1-3007(2), (5), and (8) and 18 VAC 90-20-300(A)(2)(f) and (l) of the Regulations Governing the Practice of Nursing (currently found at 18 VAC 90-19-230(A)(2)(f) and (l) of the Regulations, effective February 24, 2017), in that during the course of her employment with Western State Hospital, Staunton, Virginia, in or about 2016, Ms. Richardson entered into an inappropriate personal relationship with Patient A, who had a primary diagnosis of schizoaffective disorder, bipolar type. Specifically, Ms. Richardson discussed personal details of her life with the patient, provided him personal contact information and a photograph of herself, requested to spend time together outside of the hospital setting, and wrote him handwritten personal notes with instructions to destroy them or keep them secret. The patient also reported that Ms. Richardson expressed an interest in engaging in a physical relationship with him.

See Confidential Attachment for the name of the patient referenced above.

  
Brenda Krohn, R.N., M.S.

Deputy Executive Director  
Virginia Board of Nursing

  
Date