BEFORE THE VIRGINIA BOARD OF NURSING

IN RE:

CHARLOTTE WRIGHT, R.N.

License Number:

0001-249813

Issue Date:

February 18, 2014

Expiration Date:

July 31, 2018

Case Number:

172744

NOTICE OF INFORMAL CONFERENCE AND STATEMENT OF ALLEGATIONS

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

TYPE OF PROCEEDING:	This is an informal conference before a Special Conference Committee ("Committee") of the Board.
DATE AND TIME:	February 2, 2017 9:00 A.M.
PLACE:	Virginia Department of Health Professions Perimeter Center - 9960 Mayland Drive 2 nd 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. At the conclusion of the proceeding, the Committee is authorized to take any of the following actions:
 - 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;
 - Offer you a consent order for suspension or revocation of your license in lieu of a formal hearing.

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ABSENCE OF RESPONDENT AND RESPONDENT'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.

RESPONDENT'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 <u>only</u> 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:

- 1. Deadline for filing materials: January 26, 2017. Submit 5 copies of all documents you want the Board to consider to Melvina Baylor, Board of Nursing, 9960 Mayland Drive, Suite 300, Henrico, Virginia 23233. Exhibits may not be sent by facsimile or e-mail.
- 2. Deadline for filing motions, including requests for continuance or objections to exhibits, in writing, to Melvina Baylor at the above address: January 26, 2017. NOTE: Failure to object to the distribution prior to the proceeding will not affect your right to contest any information contained in these documents at the proceeding.

REQUEST FOR A CONTINUANCE

Absent exigent circumstances, such as personal or family illness, a request for a continuance after **January 26, 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 **January 26, 2017**.

STATEMENT OF ALLEGATIONS

The Board alleges that:

- At all times relevant hereto, Charlotte Wright, R.N., was licensed to practice professional 1. nursing in the Commonwealth of Virginia.
- Charlotte Wright, R.N., violated Virginia Code § 54.1-3007(2) and (5) and 18 VAC 90-2. 20-300(A)(2)(e) of the Regulations Governing the Practice of Nursing in that she falsified preemployment documentation, as evidenced by the following:
- In or about February 2016, in her application materials to Sentara Internal Medicine Physicians, Williamsburg, Virginia ("SIMP"), by her own admission:
- Ms. Wright falsely listed a fictitious person as a reference and set up an (i) email for that person. She then completed the online skill survey herself, in the name of the fictitious person.
- Ms. Wright falsely listed her mother as her manager for a former employer (ii) and fabricated the reference information. Ms. Wright's mother was not her manager. Ms. Wright set up a false email address for her mother and completed the online skill survey herself.
- (iii) Ms. Wright listed a former coworker as a reference, set up a false email address for the reference, and completed the online skill survey herself.
- In or about December 2015, in her application materials to Riverside Regional b. Medical Center, Newport News, Virginia ("Riverside"), Ms. Wright falsely listed her mother as her supervisor for a former employer. Ms. Wright's mother was not her supervisor.

Gloria Mitchell-Lively, R.N., M.S.N., M.B.A.

Deputy Executive Director Virginia Board of Nursing

December 30, 2016