

**VIRGINIA:**

**BEFORE THE BOARD OF NURSING**

**IN RE: KEISHA M. BROOKS, L.P.N.  
License No.: 0002-072926**

**NOTICE OF HEARING**

Pursuant to §§ 2.2-4020, 2.2-4024(F), and 54.1-2400(11) of the Code of Virginia (1950), as amended ("Code"), Keisha M. Brooks, L.P.N., who holds License No. 0002-072926 to practice practical nursing in Virginia, which expires on July 31, 2014, is hereby given notice that a formal administrative hearing will be held in the presence of a panel of the Board of Nursing. The hearing will be held on July 15, 2013 at 1:00 p.m., at the offices of the Department of Health Professions, Board of Nursing, Perimeter Center, 9960 Mayland Drive, Suite 201, Henrico, Virginia 23233, at which time Ms. Brooks will be afforded the opportunity to be heard in person or by counsel.

At the hearing, Ms. Brooks has the following rights, among others: the right to representation by counsel; the right to have witnesses subpoenaed and to present witnesses on her behalf; the right to present documentary evidence; and the right to cross-examine adverse witnesses. If Ms. Brooks desires any witnesses to appear on her behalf, she must notify the Director of Administrative Proceedings, Department of Health Professions, 9960 Mayland Drive, Suite 300, Henrico, Virginia 23233, in accordance with the Instructions for Requesting Subpoenas.

The purpose of the hearing is to inquire into evidence that Ms. Brooks may have violated certain laws and regulations governing practical nursing practice in Virginia, as more fully set forth in the Statement of Particulars below.

**STATEMENT OF PARTICULARS**

The Board alleges that:

1. Keisha M. Brooks, L.P.N., may have violated § 54.1-3007(2) of the Code and 18 VAC 90-20-300(A)(2)(e) of the Regulations Governing the Practice of Nursing (“Regulations”) in that on her July 6, 2011, application for employment with The Pediatric Connection, Richmond, Virginia:

a. Ms. Brooks failed to disclose her employment with and termination from Meadow Glen of Richmond;

b. Ms. Brooks failed to disclose her previous employments with The Hermitage, Manor Care of Stratford Hills, Westport Health Care Center, Beaufont Health and Rehabilitation Center, and Sitter and Barfoot Veterans’ Care Center;

c. Ms. Brooks falsified the dates of her employment with Westminster Canterbury and Elizabeth Adam Crump Manor.

2. Ms. Brooks may have violated § 54.1-3007(2) of the Code and 18 VAC 90-20-300(A)(2)(e) of the Regulations in that during the course of her employment with The Pediatric Connection, she falsified time sheets by reporting home visits with Client A of eight hours each on June 19, 2012, and July 19, 2012, although she had not conducted those home visits.

3. Ms. Brooks may have violated § 54.1-3007(2), (5) and (8) of the Code and 18 VAC 90-20-300(A)(2)(f) of the Regulations in that during the course of her employment with The Pediatric Connection, Ms. Brooks failed to prepare any nursing notes documenting her home visits with Client A from about April 17, 2012, through about July 31, 2012.

FOR THE BOARD

*for* *Alicia Mitchell*  
Jay P. Douglas R.N., M.S.M., C.S.A.C.  
Executive Director for the  
Board of Nursing

ENTERED: *June 20, 2013*