



# COMMONWEALTH of VIRGINIA

David E. Brown, D.C.  
Director

## Department of Health Professions

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Virginia Board of Nursing  
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Executive Director

Board of Nursing (804) 367-4515  
Nurse Aide Registry (804) 367-4569  
FAX (804) 527-4455

November 16, 2016

Vicki L Shure, R.N.  
1525 9th Ave, #2510  
Seattle, WA 98101

Certified Article Number

9414 7266 9904 2062 9208 19

SENDERS RECORD

RE: Case Number 164252

Dear Ms. Shure:

Attached is a Notice of Informal Conference and Statement of Allegations.

For information regarding this type of proceeding, including Frequently Asked Questions regarding Disciplinary Proceedings, directions to the Department of Health Professions Conference Center, instructions for requesting subpoenas, the Board's Sanctioning Reference Points, the text of the Administrative Process Act and other statutes and regulations cited herein, and other related information, please see [www.dhp.virginia.gov/Nursing/Nursing\\_Hearings.htm](http://www.dhp.virginia.gov/Nursing/Nursing_Hearings.htm). If you do not have Internet access, you may request a hard copy of any of this information by calling Dawnyel Towles at (804) 367-4647.

If you have any questions, you may contact Gloria Mitchell-Lively at (804) 367-4634 or [Gloria.Mitchell-Lively@dhp.virginia.gov](mailto:Gloria.Mitchell-Lively@dhp.virginia.gov).

Please notify the Board office of your intent to attend this proceeding.

Sincerely,

Gloria Mitchell-Lively, R.N., M.S.N., M.B.A.  
Deputy Executive Director  
Virginia Board of Nursing

GML/dt

cc: David Kazzie, Adjudication Specialist, Administrative Proceedings Division  
Anne G. Joseph, Deputy Director, Administrative Proceedings Division  
Lisa Elgin, Senior Investigator, Division of Enforcement  
Committee Members  
Nathan Mortier, Esquire, Mellette, PC, 428 McLaws Circle, Suite 200, P.O. Box 6133, Williamsburg, VA 23185

**BEFORE THE VIRGINIA BOARD OF NURSING**

**IN RE: VICKI L SHURE, R.N.**  
**License Number: 0001-200695**  
**Issue Date: April 20, 2006**  
**Expiration Date: November 30, 2015**  
**Case Number: 164252**

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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 license to practice professional 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>December 14, 2016 9:00 A.M.</b>
<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. 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.

**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 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:**

1. Deadline for filing materials: December 7, 2016. Submit 5 copies of all documents you want the Board to consider to Dawnyel Towles, 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 Dawnyel Towles at the above address: December 7, 2016. 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 **December 7, 2016**, 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 **December 7, 2016**.

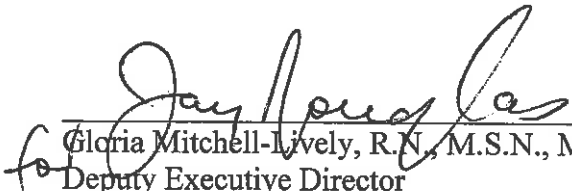
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STATEMENT OF ALLEGATIONS

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The Board alleges that:

1. At all times relevant hereto, Vicki L Shure, R.N., was licensed to practice professional nursing in the Commonwealth of Virginia.
2. Ms. Shure violated Virginia Code § 54.1-3007(2) and (5) and 18 VAC 90-20-300(A)(2)(c) of the Regulations Governing the Practice of Nursing in that between about April 2015, and June 18, 2015, during the course of her employment with ATC Healthcare, Smyrna, Georgia, as a travel nurse assigned to Carilion Roanoke Memorial Hospital, Roanoke, Virginia, by her own admission, Ms. Shure diverted Toradol (C-VI) for her own personal and unauthorized use.

  
Gloria Mitchell-Lively, R.N., M.S.N., M.B.A.  
Deputy Executive Director  
Virginia Board of Nursing

November 16<sup>th</sup>,  
Date 2016