

BEFORE THE VIRGINIA BOARD OF NURSING

IN RE: SHERI RANDOLPH BRADSHAW, R.N.
License Number: 0001-179588
Case Number: 176148

CONSENT ORDER

JURISDICTION AND PROCEDURAL HISTORY

The Virginia Board of Nursing ("Board") and Sheri Randolph Bradshaw, R.N., as evidenced by their signatures hereto, in lieu of proceeding to a formal administrative proceeding, enter into the following Consent Order affecting Ms. Bradshaw's license to practice professional nursing in the Commonwealth of Virginia.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

1. Sheri Randolph Bradshaw, R.N. was issued License Number 0001-179588 to practice professional nursing on July 9, 2002, which was suspended by Order of the Board entered March 25, 2015 and reinstated by Order of the Board entered August 31, 2016. The license was suspended pursuant to Virginia Code § 54.1-2409 by Order of the Virginia Department of Health Professions on November 15, 2016. Ms. Bradshaw also holds licenses to practice professional nursing in the States of California, Florida, Illinois, Ohio, and Washington and the in Commonwealths of Massachusetts and Pennsylvania, all of which are suspended. Her primary state of residence is Virginia
2. By Consent Order entered March 25, 2015, the Board suspended Ms. Bradshaw's license to practice professional nursing. By Order entered August 31, 2016, the Board granted Ms. Bradshaw's application for reinstatement of her license contingent on her entry into and compliance with the Virginia Health Practitioners' Monitoring Program.

3. By Order entered July 23, 2015, the Washington Board of Nursing suspended Ms. Bradshaw's license to practice professional nursing in the State of Washington. This Order was based on the Virginia Consent Order of March 25, 2015, suspending Ms. Bradshaw's Virginia nursing license.

4. By Consent Order entered January 26, 2016, the California Board of Nursing suspended Ms. Bradshaw's license to practice nursing in the State of California. This Order was based on the Virginia Consent Order of March 25, 2015, suspending Ms. Bradshaw's Virginia nursing license.

5. By Consent Order entered March 29, 2016, the Florida Board of Nursing suspended Ms. Bradshaw's license to practice nursing in the State of Florida. This Order was based on the Virginia Consent Order of March 25, 2015, suspending Ms. Bradshaw's Virginia nursing license.

6. By Order entered May 19, 2016, the Ohio Board of Nursing suspended Ms. Bradshaw's license to practice nursing in the State of Ohio. This Order was based on the Virginia Consent Order of March 25, 2015, suspending Ms. Bradshaw's Virginia nursing license.

7. By Order entered July 11, 2016, the Illinois Board of Nursing suspended Ms. Bradshaw's license to practice nursing in the State of Illinois. This Order was based on the Virginia Consent Order of March 25, 2015, suspending Ms. Bradshaw's Virginia nursing license.

8. By Consent Order entered August 22, 2016, the Massachusetts Board of Nursing suspended Ms. Bradshaw's license to practice nursing in the Commonwealth of Massachusetts. This Order was based on the Virginia Consent Order of March 25, 2015, suspending Ms. Bradshaw's Virginia nursing license.

9. By Order entered August 24, 2016, the Pennsylvania Board of Nursing suspended Ms. Bradshaw's license to practice nursing in the Commonwealth of Pennsylvania. This Order was based

on the Virginia Consent Order of March 25, 2015, suspending Ms. Bradshaw's Virginia nursing license.

10. The matter of the reinstatement of Ms. Bradshaw's license to practice professional nursing in the Commonwealth of Virginia is properly before the Board.

CONSENT

Sheri Randolph Bradshaw, R.N., by affixing her signature to this Consent Order, agrees to the following:

1. I have been advised to seek advice of counsel prior to signing this document;
2. I am fully aware that without my consent, no legal action can be taken against me or my license except pursuant to the Virginia Administrative Process Act, Virginia Code § 2.2-4000 *et seq.*;
3. I acknowledge that I have the following rights, among others: the right to a formal administrative hearing before the Board; the right to representation by counsel; and the right to cross-examine witnesses against me;
4. I waive my right to a formal hearing;
5. I admit to the Findings of Fact and Conclusions of Law contained herein and waive my right to contest such Findings of Fact and Conclusions of Law and any sanction imposed hereunder in any future judicial or administrative proceeding in which the Board is a party;
6. I consent to the entry of the following Order affecting my license to practice professional nursing in the Commonwealth of Virginia.

ORDER

Based on the foregoing Findings of Fact and Conclusions of Law, the Virginia Board of Nursing hereby ORDERS as follows:

1. The license of Sheri Randolph Bradshaw, R.N., is REINSTATED contingent upon her entry into the HPMP. Thereafter, Sheri Randolph Bradshaw shall comply with the terms and conditions of the HPMP for the period specified by the HPMP.

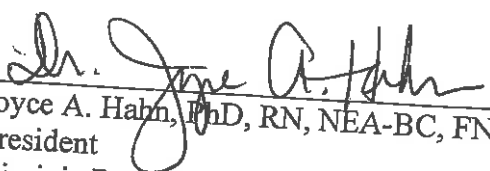
2. Upon receipt of evidence of Sheri Randolph Bradshaw's participation in and successful completion of the terms specified by the HPMP, the Board, at its discretion, may waive Sheri Randolph Bradshaw's appearance before the Board and conduct an administrative review of this matter, at which time she may be issued an unrestricted license.

3. This Order is applicable to Sheri Randolph Bradshaw's multistate licensure privileges, if any, to practice professional nursing in the Commonwealth of Virginia. For the duration of this Order, Sheri Randolph Bradshaw shall not work outside of the Commonwealth of Virginia pursuant to a multistate licensure privilege without the written permission of the Virginia Board of Nursing and the Board of Nursing in the party state where she seeks to work. Any requests for out of state employment should be directed, in writing, to the Executive Director of the Board.

4. Sheri Randolph Bradshaw shall comply with all laws and regulations governing the practice of professional nursing in the Commonwealth of Virginia.

Pursuant to Virginia Code §§ 2.2-4023 and 54.1-2400.2, the signed original of this Order shall remain in the custody of the Department of Health Professions as a public record, and shall be made available for public inspection and copying upon request.

FOR THE BOARD


Joyce A. Hahn, PhD, RN, NEA-BC, FNAP
President
Virginia Board of Nursing

ENTERED: 11/15/16

SEEN AND AGREED TO:

Sheri R Bradshaw RN
Sheri Randolph Bradshaw, R.N.

COMMONWEALTH OF ~~VIRGINIA~~ Georgia
COUNTY/CITY OF Chatham/Savannah, Ga, TO WIT:

Subscribed and sworn to me, a notary public in and for the Commonwealth of ~~Virginia~~ Georgia at large, on this
28th day of October, 20 16.

Rebecca M. Smith
Notary Public

My commission expires:

3/29/17

Registration No.:

Certified True Copy
By dgraham
Virginia Board Of Nursing

BEFORE THE VIRGINIA DEPARTMENT OF HEALTH PROFESSIONS

IN RE: SHERI RANDOLPH BRADSHAW, R.N.
License Number: 0001-179588
Case Number: 176148

ORDER OF MANDATORY SUSPENSION

In accordance with Virginia Code § 54.1-2409, I, David E. Brown, D.C., Director of the Virginia Department of Health Professions, received and acted upon evidence that the Boards of Nursing of California, Florida, Illinois, Ohio, Massachusetts, Pennsylvania, and Washington suspended the licenses of Sheri Randolph Bradshaw, R.N., to practice professional nursing in those States. Certified copies of the Orders entered in those States are attached hereto as Commonwealth's Exhibits 1-7.

WHEREUPON, by the authority vested in the Director of the Department of Health Professions pursuant to Virginia Code § 54.1-2409, it is hereby ORDERED that the license of Sheri Randolph Bradshaw, R.N., to practice professional nursing in the Commonwealth of Virginia is hereby SUSPENDED.

Upon entry of this Order, the license of Sheri Randolph Bradshaw, R.N., will be recorded as suspended and no longer current and valid. Should Sheri Randolph Bradshaw, R.N., seek reinstatement of her license pursuant to Virginia Code § 54.1-2409, she shall be responsible for any fees that may be required for the reinstatement of the license prior to issuance of the license to resume practice.

This Order shall be applicable to Ms. Bradshaw's multistate licensure privilege, if any, to practice professional nursing in the Commonwealth of Virginia.

Pursuant to Virginia Code § 2.2-4023 and § 54.1-2400.2, the signed original of this Order shall remain in the custody of the Department of Health Professions as a public record and shall be made available for public inspection or copying on request.



David E. Brown, D.C., Director
Virginia Department of Health Professions

ENTERED:


11/15/16

Certified True Copy

By drabham
Virginia Board Of Nursing

CERTIFICATION OF DUPLICATE RECORDS

I, David E. Brown, D.C., Director of the Department of Health Professions, hereby certify that the attached Orders regarding Sheri Randolph Bradshaw, R.N., are true copies of the records received from the Boards of Nursing of the States of California, Florida, Illinois, Ohio, and Washington and the Commonwealths of Massachusetts and Pennsylvania.



David E. Brown, D.C.

Date: 11/15/16

BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Stipulated Surrender
Pursuant to Business and Professions
Code section 2751 of:

Case No. 2016-723

SHERI R. BRADSHAW a.k.a.,
SHERI ANN RANDOLPH

Registered Nurse License No. 718484

Respondent.

DECISION AND ORDER

Pursuant to Title 16 of the California Code of Regulations, section 1403,
the attached Stipulated Settlement is hereby adopted by the Board of Registered
Nursing as its Decision and Order in the above-entitled matter.

This Decision shall become effective on January 26, 2016.

IT IS SO ORDERED this 26th day of January, 2016.

Louise R. Bailey

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

Board of Registered Nursing
Department of Consumer Affairs
State of California

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

BOARD OF REGISTERED NURSING

Louise R. Bailey, M.Ed., RN
Louise R. Bailey, M. ED., RN
Executive Officer



1 KAMALA D. HARRIS
Attorney General of California
2 JAMES M. LEDAKIS
Supervising Deputy Attorney General
3 ERIN M. SUNSERI
Deputy Attorney General
4 State Bar No. 207031
600 West Broadway, Suite 1800
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
Telephone: (619) 645-2071
7 Facsimile: (619) 645-2061
8 *Attorneys for Complainant*

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

11 In the Matter of the Stipulated Surrender Pursuant to
12 Business and Professions Code section 2751 of:

13 **SHERI R. BRADSHAW,**
14 **AKA SHERI ANN RANDOLPH**
13701 River Tree Court, Apartment 102
15 Chester, VA 23836

16 Registered Nurse License No. 718484

17 Respondent.

Case No.

**STIPULATED SURRENDER OF
LICENSE AND ORDER PURSUANT
TO BUSINESS AND PROFESSIONS
CODE SECTION 2751**

19
20 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
21 entitled proceedings that the following matters are true:

22 **PARTIES**

23 1. Louise R. Bailey, M.Ed., RN (Complainant) is the Executive Officer of the Board of
24 Registered Nursing. She brought this action solely in her official capacity and is represented in
25 this matter by Kamala D. Harris, Attorney General of the State of California, by Erin M. Sunseri,
26 Deputy Attorney General.

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1 2. Respondent Sheri R. Bradshaw, aka Sheri Ann Randolph (Respondent) is
2 representing herself in this proceeding and has chosen not to exercise her right to be represented
3 by counsel.

4 3. On or about January 23, 2008, the Board of Registered Nursing issued Registered
5 Nurse License No. 718484 to Respondent. The license will expire on December 31, 2015, unless
6 renewed.

7
JURISDICTION

8 4. Pursuant to Business and Professions Code section 2751, the Board in its discretion,
9 may accept the surrender of a license through a stipulated settlement in the absence of a pleading
10 when the ability of a registered nurse to practice nursing safely is impaired due to a mental or
11 physical illness.

12
ADVISEMENT AND WAIVERS

13 5. Respondent has carefully read, and understands the effects of this Stipulated
14 Surrender of License and Order.

15 6. Respondent is fully aware of her legal rights in this matter, including the right to a
16 hearing; the right to be represented by counsel at her own expense; the right to confront and
17 cross-examine the witnesses against her; the right to present evidence and to testify on her own
18 behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the
19 production of documents; the right to reconsideration and court review of an adverse decision;
20 and all other rights accorded by the California Administrative Procedure Act and other applicable
21 laws.

22 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
23 every right set forth above.

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CULPABILITY

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8. Respondent's ability to practice as a Registered Nurse is currently impaired due to a physical or mental illness. On March 25, 2015, in a matter entitled, *In Re: Sheri R. Bradshaw, R.N., License No.: 0001-179588*, the Virginia Board entered a Consent Order accepting the voluntary surrender for indefinite suspension of Respondent's license to practice professional nursing in the Commonwealth of Virginia and her multistate privilege to practice professional nursing. Respondent was found unable to practice safely due to physical or mental impairment, which constituted a violation of Code of Virginia (CV) section 54.1-3007, subdivision (6). Respondent last worked as a nurse on July 1, 2014, Respondent reported that her psychiatrist did not feel that she is safe to practice professional nursing. On December 3, 2014, Respondent submitted a written statement voluntarily surrendering her license to practice professional nursing for an indefinite period. On December 3, 2014, pursuant to CV sections 2.2-4019, 2.2-4021, and 54.1-2400, subdivision (10), an informal conference was held and the Virginia Board adopted a Findings of Fact and Conclusions of Law.

9. Respondent hereby surrenders her Registered Nurse License for the Board's formal acceptance pursuant to Business and Professions Code section 2751.

10. Respondent understands that by signing this stipulation, she enables the Board to issue an order accepting the surrender of her Registered Nurse License without further process.

CONTINGENCY

11. This stipulation shall be subject to approval by the Board of Registered Nursing. Respondent understands and agrees that counsel for Complainant and the staff of the Board of Registered Nursing may communicate directly with the Board regarding this stipulation and surrender, without notice to or participation by Respondent. By signing the stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action

1 between the parties, and the Board shall not be disqualified from further action by having
2 considered this matter.

3 12. The parties understand and agree that Portable Document Format (PDF) and facsimile
4 copies of this Stipulated Surrender of License and Order, including PDF and facsimile signatures
5 thereto, shall have the same force and effect as the originals.

6 13. This Stipulated Surrender of License and Order is intended by the parties to be an
7 integrated writing representing the complete, final, and exclusive embodiment of their agreement.
8 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
9 negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order
10 may not be altered, amended, modified, supplemented, or otherwise changed except by a writing
11 executed by an authorized representative of each of the parties.

12 14. In consideration of the foregoing admissions and stipulations, the parties agree that
13 the Board may, without further notice or formal proceeding, issue and enter the following
14 Disciplinary Order:

15 **ORDER**

16 IT IS HEREBY ORDERED that Registered Nurse License No. 718484 issued to
17 Respondent Sheri R. Bradshaw, aka Sheri Ann Randolph (Respondent) is surrendered and
18 accepted by the Board of Registered Nursing.

19 1. The surrender of Respondent's Registered Nurse License and the acceptance of the
20 surrendered license by the Board shall constitute the imposition of discipline against Respondent.
21 This stipulation constitutes a record of the discipline and shall become a part of Respondent's
22 license history with the Board of Registered Nursing.

23 2. Respondent shall lose all rights and privileges as a registered nurse in California as of
24 the effective date of the Board's Decision and Order.

25 3. Respondent shall cause to be delivered to the Board her pocket license and, if one was
26 issued, her wall certificate on or before the effective date of the Decision and Order.

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1 4. If Respondent ever files an application for licensure or a petition for reinstatement in
2 the State of California, the Board shall treat it as a petition for reinstatement. Any reinstatement
3 proceeding shall be conducted pursuant to Business and Professions Code section 2760.1.
4 Respondent must comply with all laws, regulations and procedures for reinstatement of a revoked
5 license in effect at the time the petition is filed, and all the admissions and stipulations contained
6 in the Stipulated Surrender of License and Order shall be deemed to be true, correct and admitted
7 by Respondent when the Board determines whether to grant or deny the petition. Upon seeking
8 reinstatement, it is the responsibility of the former licensee to submit competent evidence of her
9 ability to safely and competently practice as a registered nurse.

10 5. Respondent may petition the Board for reinstatement after a period of not less than
11 one (1) year from the effective date of the Board of Registered Nursing's Decision and Order.

12 ACCEPTANCE

13 I have carefully read the above Stipulated Surrender of License and Order. I understand
14 the stipulation and the effect it will have on my Registered Nurse License. I enter into this
15 Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to
16 be bound by the Decision and Order of the Board of Registered Nursing.

17
18 DATED: 1/10/15

Sheri R Bradshaw

SHERI R. BRADSHAW, AKA SHERI ANN
RANDOLPH
Respondent

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ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Board of Registered Nursing.

Dated: 1/19/2016

Respectfully submitted,

KAMALEA D. HARRIS
Attorney General of California
JAMES M. LEDAKIS
Supervising Deputy Attorney General


ERIN M. SUNSERI
Deputy Attorney General
Attorneys for Complainant

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STATE OF FLORIDA
BOARD OF NURSING

Final Order No. DOH-16-1415-S -MQA

FILED DATE - 7-6-16
Department of Health

By: Amy L. Conway
Deputy Agency Clerk

DEPARTMENT OF HEALTH,

Petitioner,

vs.

Case No.: 2015-10779

License No.: RN 9280933

SHERI ANN BRADSHAW,

Respondent.

FINAL ORDER

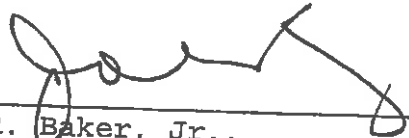
THIS CAUSE came before the BOARD OF NURSING (Board) pursuant to Sections 120.569 and 120.57(4), Florida Statutes, on June 2, 2016, in Jacksonville, Florida, for the purpose of considering a settlement agreement (attached hereto as Exhibit A) entered into between the parties in this cause. Upon consideration of the settlement agreement, the documents submitted in support thereof, the arguments of the parties, and being otherwise fully advised in the premises, it is hereby

ORDERED AND ADJUDGED that the settlement agreement as submitted be and is hereby approved and adopted in toto and incorporated herein by reference. Accordingly, the parties shall adhere to and abide by all the terms and conditions of the settlement agreement. The investigative costs are \$690.28.

This Final Order shall take effect upon being filed with the Clerk of the Department of Health.

DONE AND ORDERED this 30th day of June, 2016.

BOARD OF NURSING



Joe R. Baker, Jr.,
Executive Director for
Jody Bryant Newman, EdD, EdS
Chair

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Final Order has been provided by U.S. Mail-certified mail to SHERI ANN BRADSHAW, 13701 River Tree Court, Apt. 102, Chester, VA 23836; 4283 Baxter Road, Prince George, VA 23875; and William E. Strickland, Esq., 1700 N. Monroe, Suite 11-344, Tallahassee, Florida 32303; and by email to Dept. of Health - PSU, at Matthew.Witters@flhealth.gov and by email to Lee Ann Gustafson, Senior Assistant Attorney General, at

LeeAnn.Gustafson@myfloridalegal.com this 7th day of

Jody, 2016.
Chester



Deputy Agency Clerk

7016 0340 0000 8263 1159

Prince George

7016 0340 0000 8263 1166

Case No. 2015-10779



7016 0340 0000 8263 1173

**STATE OF FLORIDA
DEPARTMENT OF HEALTH**

DEPARTMENT OF HEALTH,

PETITIONER,

v.

CASE NO. 2015-10779

**SHERI ANN BRADSHAW, R.N.,
a.k.a. SHERI R. BRADSHAW, R.N.,**

RESPONDENT.

SETTLEMENT AGREEMENT

Pursuant to Section 120.57(4), Florida Statutes, the above named parties hereby offer this Settlement Agreement (Agreement) and agree to entry of a Final Order of the Board of Nursing (Board) incorporating this Agreement as disposition of the Administrative Complaint, in lieu of any other administrative proceedings. The terms herein become effective only if and when a Final Order accepting this Agreement is issued by the Board and filed with the Department of Health Agency Clerk.

In considering this Agreement, the Board may review all materials gathered during the investigation of this case. If this Agreement is rejected, it, and its presentation to the Board, shall not be used against either party.

STIPULATED FACTS

1. At all times material to this matter, Respondent was a registered nurse in the State of Florida holding license number RN 9280933.
2. The Department charged Respondent with an Administrative Complaint that was properly served upon Respondent with violations of Chapters 456 and/or 464, Florida

Statutes. A true and correct copy of the Administrative Complaint is attached hereto and incorporated by reference as Exhibit A.

3. Respondent neither admits nor denies the factual allegations contained in the Administrative Complaint.

STIPULATED LAW

1. Respondent admits that she is subject to the provisions of Chapters 456 and 464, Florida Statutes, and the jurisdiction of the Department and the Board.

2. Respondent admits that the stipulated facts, if proven true, constitute violations of Chapter 456 and/or 464, Florida Statutes as alleged in the Administrative Complaint.

3. Respondent agrees that the Agreement is a fair, appropriate, and reasonable resolution of this pending matter.

PROPOSED DISPOSITION

1. The Respondent shall pay investigative costs not to exceed one thousand, four hundred, eight dollars and sixty-three cents (\$1,408.63) within 1 year from the date of entry of the Final Order. Payment shall be made to the Board of Nursing and mailed to, DOH/HMQACS, Compliance Management Unit, Bin C76, Post Office Box 6320, Tallahassee, Florida 32314-6320, Attention: Nursing Compliance Officer. **Payment must be made by cashier's check or money order ONLY.** Personal checks will NOT be accepted.

2. Respondent's license is suspended unless and until Respondent provides proof of reinstatement/licensure as a registered nurse in the State of Virginia. Proof of

compliance and reinstatement/licensure in Virginia shall be sent to: DOH/HMQACS, Compliance Management Unit, Bin C76, Post Office Box 6320, Tallahassee, Florida 32314-6320, Attention: Nursing Compliance Officer.

3. Within 30 days, the Respondent shall return the license to DOH-Compliance Management Unit, 4052 Bald Cypress Way, Tallahassee, Florida 32399-3276, Attention: Nursing Compliance Officer, or shall surrender her license to an investigator with the Department of Health. The Respondent's employer shall immediately be informed of the suspension in writing by the Respondent with a copy to DOH-Compliance Management Unit, 4052 Bald Cypress Way, Tallahassee, Florida 32399-3276, Attention: Nursing Compliance Officer.

STANDARD LANGUAGE

1. The Respondent shall not violate Chapter 456 or 464, Florida Statutes, the rules promulgated pursuant thereto, any other state or federal law, rule, or regulation relating to the practice or the ability to practice nursing. Violation of an order from another state/jurisdiction shall constitute grounds for violation of the Final Order accepting this Settlement Agreement.

2. It is expressly understood that this Settlement Agreement is subject to the approval of the Department and the Board, and has no force and effect until a Final Order is entered accepting this Settlement Agreement.

3. This Settlement Agreement is executed by the Respondent for the purpose of avoiding further administrative action by the Board of Nursing regarding the acts or omissions specifically set forth in the Administrative Complaint attached hereto. In this

regard, Respondent authorizes the Board to review and examine all investigative file materials concerning Respondent prior to, or in conjunction with, consideration of the Agreement. Furthermore, should this Settlement Agreement not be accepted by the Board, it is agreed that presentation to, and consideration of, this Settlement Agreement and other documents and matters by the Board shall not unfairly or illegally prejudice the Board or any of its members from further participation, consideration or resolution of these proceedings. Respondent shall offer no evidence, testimony or argument that disputes or contravenes any stipulated fact or conclusion of law.

4. Respondent and the Department fully understand that this Settlement Agreement and subsequent Final Order Incorporating same will in no way preclude additional proceedings by the Board and/or Department against the Respondent for acts or omissions not specifically set forth in the Administrative Complaint attached hereto. This Agreement relates solely to the current disciplinary proceedings arising from the above-mentioned Administrative Complaint and does not preclude further action by other divisions, departments, and/or sections of the Department, including but not limited to the Agency for Health Care Administration's Medicaid Program Integrity Office.

5. The Respondent waives the right to seek any attorney's fees or costs from the Department in connection with this disciplinary proceeding.

6. Respondent waives all rights to appeal and further review of this Agreement and these proceedings.

WHEREFORE, the parties hereto request the Board enter a Final Order accepting and implementing the terms of the Settlement Agreement contained herein.

SIGNED this 28th day of March, 2016.

Sheri R Bradshaw
SHERI ANN BRADSHAW, R.N.

Virginia
STATE OF FLORIDA
COUNTY OF Howell

Before me personally appeared Greg R. Beckwith whose identity is known to be by VA Driver License (type of identification), and who under oath, acknowledges that his/her signature appears above. Sworn to and subscribed by Respondent before me this 28 day of March, 2016.

Shari A. Lickel
Notary Public
My Commission Expires Sept 30, 2017
790-4132

APPROVED this 29th day of March, 2016.

John H. Armstrong, MD, FACS
State Surgeon General and
Secretary of Health

Jenna Perlin
Jenna Perlin
Assistant General Counsel
DOH Prosecution Services Unit
4052 Bald Cypress Way, Bin C-65
Tallahassee, FL 32399-3265
Florida Bar #28242
(850) 245-4444 telephone
(850) 245-4662 facsimile
Email: jenna.perlin@flhealth.gov

**STATE OF FLORIDA
DEPARTMENT OF HEALTH**

DEPARTMENT OF HEALTH,

PETITIONER,

v.

CASE NO. 2015-10779

**SHERI ANN BRADSHAW, R.N.,
a/k/a SHERI R. BRADSHAW, R.N.,**

RESPONDENT.

ADMINISTRATIVE COMPLAINT

COMES NOW, Petitioner, Department of Health, by and through its undersigned counsel, and files this Administrative Complaint before the Board of Nursing against Respondent, Sherri Ann Bradshaw, R.N., and in support thereof alleges:

1. Petitioner is the state agency charged with regulating the practice of nursing pursuant to Section 20.43, Florida Statutes; Chapter 456, Florida Statutes; and Chapter 464, Florida Statutes.

2. At all times material to this Administrative Complaint, Respondent was a registered nurse (R.N.) within the state of Florida, having been issued license number RN9280933.

3. Respondent's address of record is 13701 River Tree Court, Apartment 102, Chester, Virginia 23836.

4. At all times material to this Administrative Complaint, Respondent was licensed to practice nursing in the state of Virginia, having been issued Virginia license number 0001-179588.

5. The Board of Nursing of the Commonwealth of Virginia ("Virginia Board") is the licensing authority for nurses in the state of Virginia.

6. On or about March 25, 2015, the Virginia Board issued an order accepting Respondent's Voluntary Surrender for Indefinite Suspension of Respondent's Virginia nursing license, whereby suspending Respondent's Virginia nursing license.

7. Section 464.018(1)(b), Florida Statutes (2014), provides that having a license to practice nursing revoked, suspended, or otherwise acted against, including the denial of licensure, by the licensing authority of another state, territory, or country, constitutes grounds for disciplinary action.

8. On or about March 25, 2015, Respondent's license to practice nursing in the state of Virginia was suspended or otherwise acted against by the Virginia Board.

9. Based on the foregoing, Respondent has violated Section 464.018(1)(b), Florida Statutes (2014).

[Remainder of page intentionally left blank]

WHEREFORE, the Petitioner respectfully requests that the Board of Nursing enter an order imposing one or more of the following penalties: permanent revocation or suspension of Respondent's license, restriction of practice, imposition of an administrative fine, issuance of a reprimand, placement of the Respondent on probation, corrective action, refund of fees billed or collected, remedial education and/or any other relief that the Board deems appropriate.

SIGNED this 8th day of September, 2015.

John H. Armstrong, MD, FACS
State Surgeon General and Secretary of Health



CHRISTOPHER A. JURICH
Assistant General Counsel
Fla. Bar No. 0099014
DOH Prosecution Services Unit
4052 Bald Cypress Way, Bin C-65
Tallahassee, FL 32399-3265
Telephone: (850) 245-4444 ext. 8174
Facsimile: (850) 245-4662
Email: christopher.jurich@flhealth.gov

/CAJ

PCP Meeting: September 8, 2015
PCP Members: Lavigne Kirkpatrick, Todd Katz

FILED
DEPARTMENT OF HEALTH
DEPUTY CLERK
CLERK *Angel Sanders*
DATE SEP 08 2015

NOTICE OF RIGHTS

Respondent has the right to request a hearing to be conducted in accordance with Section 120.569 and 120.57, Florida Statutes, to be represented by counsel or other qualified representative, to present evidence and argument, to call and cross-examine witnesses and to have subpoena and subpoena duces tecum issued on his or her behalf if a hearing is requested.

A request or petition for an administrative hearing must be in writing and must be received by the Department within 21 days from the day Respondent received the Administrative Complaint, pursuant to Rule 28-106.111(2), Florida Administrative Code. If Respondent fails to request a hearing within 21 days of receipt of this Administrative Complaint, Respondent waives the right to request a hearing on the facts alleged in this Administrative Complaint pursuant to Rule 28-106.111(4), Florida Administrative Code. Any request for an administrative proceeding to challenge or contest the material facts or charges contained in the Administrative Complaint must conform to Rule 28-106.2015(5), Florida Administrative Code.

Mediation under Section 120.573, Florida Statutes, is not available to resolve this Administrative Complaint.

NOTICE REGARDING ASSESSMENT OF COSTS

Respondent is placed on notice that Petitioner has incurred costs related to the investigation and prosecution of this matter. Pursuant to Section 456.072(4), Florida Statutes, the Board shall assess costs related to the investigation and prosecution of a disciplinary matter, which may include attorney hours and costs, on the Respondent in addition to any other discipline imposed.

STATE OF ILLINOIS
DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION
DEPARTMENT OF PROFESSIONAL REGULATION

DEPARTMENT OF FINANCIAL AND)	
PROFESSIONAL REGULATION of the)	
State of Illinois,)	
)	Complainant,
)	
vs.)	No. 2015-3718
)	
SHERI R. BRADSHAW)	
License No. 041371426)	
)	Respondent.

ORDER

This matter having come before the Illinois Board of Nursing of the Department of Financial and Professional Regulation, Division of Professional Regulation of the State of Illinois, [hereinafter, the "Department,"] the Illinois Board of Nursing, having made Findings of Fact, Conclusions of Law and a Recommendation to the Director of the Department; and the Department having complied with all required notices; and the time allowed for Respondent to file a Motion for Rehearing having now passed;

NOW, THEREFORE, I, Jay Stewart, Director of the Division of Professional Regulation of the Department of Financial and Professional Regulation of the State of Illinois, do HEREBY ADOPT the FINDINGS OF FACT, CONCLUSIONS OF LAW AND RECOMMENDATION of the Illinois Board of Nursing dated May 6, 2016.

IT IS HEREBY ORDERED that SHERI R. BRADSHAW's License No. 041371426, as a Registered Professional Nurse shall be INDEFINITELY SUSPENDED for a minimum of six (6) months. Upon filing a Petition to Restore the Respondent must provide proof of evaluation by a psychiatrist who or an advanced practice nurse certified in mental health, and must meet the recommendations of the evaluation. If Respondent remains out of practice for five years, she must present evidence of successful completion of a Department-approved licensure examination (NCLEX).

IT IS FURTHER ORDERED that SHERI R. BRADSHAW immediately surrender her license and all other indicia of licensure to the Department. Failure to surrender shall allow the Department to seize License No. 041371426.

DATED THIS 11th day of July, 2016.

DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION
DIVISION OF PROFESSIONAL REGULATION of the State of Illinois,
Bryan Schneider, SECRETARY.



Jay Stewart, DIRECTOR

Sheri R. Bradshaw
Lic. N

**STATE OF ILLINOIS
DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION
DIVISION OF PROFESSIONAL REGULATION**

DEPARTMENT OF FINANCIAL AND)
PROFESSIONAL REGULATION)
of the State of Illinois,	Complainant)
v.) No. 2015-3718
SHERI R. BRADSHAW)
License No. 041371426	Respondent)

**FINDINGS OF FACT, CONCLUSIONS OF LAW
AND RECOMMENDATION TO THE DIRECTOR**

Now comes the Illinois State Board of Nursing of the Division of Professional Regulation of the Department of Financial and Professional Regulation of the State of Illinois and, after reviewing the record in this matter, a majority of its members hereby makes the following Findings of Fact, Conclusions of Law and Recommendation to the Director of Professional Regulation:

FINDINGS OF FACT

1. THAT Respondent, SHERI R. BRADSHAW, is presently the holder of a NON RENEWED Registered Professional Nurse License No. 041371426, in the State of Illinois, issued by the Department of Financial and Professional Regulation of the State of Illinois. Respondent's license has been in NOT RENEWED status since May 31, .
2. THAT the Department filed a Complaint against Respondent and sent Notice of Preliminary Hearing and a Complaint to Respondent by certified and regular mail to the last known address of Respondent: 13701 River Tree Ct. #102, Chester, VA 23836-6163. The Preliminary Hearing was set for November 23, 2015.
3. THAT on November 23, 2015, Respondent failed to appear, either in person or by counsel.
4. THAT on November 23, 2015, the Administrative Law Judge ordered that Respondent file an Answer to the Department's Complaint on or before December 21, 2015. A Status Hearing was set for December 28, 2015. The Administrative Law Judge's Order stated that the failure to file an Answer would result in Respondent being held in default and the matter being sent to the Illinois Board of Nursing on the pleadings.
5. THAT on December 28, 2015, Respondent failed to appear and file an Answer to the

Department's complaint. The Administrative Law Judge held the Respondent in DEFAULT and transferred the matter to the Nursing Board for its deliberation on the pleadings. A copy of the Administrative Law Judge's Order was sent by certified and regular mail to the last known address of Respondent.

6. THAT this Board finds the following allegations of the Complaint to be true:
 - A. Respondent, SHERI R. BRADSHAW's Illinois Registered Professional Nurse License No. 041371426, issued by the Department of Financial and Professional Regulation of the State of Illinois has been in NOT RENEWED status since May 31, 2014.
 - B. On 3/25/15 the VIRGINIA Board of Nursing determined Respondent was unable to practice safely due to psychological impairment or mental disorder and SUSPENDED AND VOLUNTARILY SURRENDERED Respondent's license.
 - C. That Respondent failed to report the Virginia Board discipline to Illinois.
 - C. That the foregoing acts and/or omissions are grounds for revocation or suspension in Illinois of a Nurse License and fines not to exceed \$10,000.00 per violation, pursuant to 225 ILCS 65/70-5(b) (10) and (16), and 68 Ill. Adm. Code §1300.90 et seq., §1300.250, and §1300.260.

CONCLUSIONS OF LAW

1. THAT the Illinois State Board of Nursing of the Division of Professional Regulation of the Illinois Department of Financial and Professional Regulation has jurisdiction over the subject matter and of the parties in this case.
2. THAT Respondent's conduct as alleged in the Department's Complaint was in violation of the Illinois Nurse Practice Act pursuant to 225 ILCS 65/70-5(b) (10) and (16), and 68 Ill. Adm. Code §1300.90 et seq., §1300.250, and §1300.260.

RECOMMENDATION

The Illinois State Board of Nursing of the Division of Professional Regulation of the Department of Financial and Professional Regulation of the State of Illinois, after deliberation has made Findings of Fact and Conclusions of Law, and recommends to the Director of the Division that the license to practice as a registered professional nurse of SHERI R. BRADSHAW, License No. 041371426, be INDEFINITELY SUSPENDED FOR A MINIMUM OF SIX MONTHS.

DATED THIS 6th DAY OF May, 2016.

CHAIRPERSON, ILLINOIS STATE BOARD OF NURSING

Susan Emberson
MEMBER

MEMBER

A. Puck
MEMBER

MEMBER

Veronica Smith
MEMBER

MEMBER

MEMBER

MEMBER

MEMBER

MEMBER

MEMBER

MEMBER

Resp. SHERI R. BRADSHAW
Case No. 2015-3718
License No. 041371426

DATED THIS 6th DAY OF May, 2016.

Jean Lubien
CHAIRPERSON, ILLINOIS STATE BOARD OF NURSING

Ann Amaefule
MEMBER

MEMBER

Charly Cooper
MEMBER

MEMBER

[Signature]
MEMBER

MEMBER

[Signature]
MEMBER

MEMBER

[Signature]
MEMBER

MEMBER

Bernadette Roche
MEMBER

MEMBER

Resp. SHERI R. BRADSHAW
Case No. 2015-3718
License No. 041371426

STATE OF ILLINOIS
DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION

DIVISION OF PROFESSIONAL REGULATION
of the State of Illinois, Complainant

v.

SHERI R BRADSHAW

Respondent

)
)
)
)
)

201503718

NOTICE

TO: SHERI R BRADSHAW
13701 RIVER TREE CT.
APT 102
CHESTER, VA 23836-6163

PLEASE TAKE NOTICE that the Director of the Division of Professional Regulation signed the attached Order.

YOU ARE FURTHER NOTIFIED that you have a right to judicial review of all final administrative decisions of this Department, pursuant to the provisions of the Code of Civil Procedure, Administrative Review Law, 735 ILCS 5/3-103, and all amendments and modifications thereof, and the rules adopted pursuant thereto.

The Order of the Director of the Division of Professional Regulation will be implemented as of the date of the Order unless otherwise stated.

DIVISION OF PROFESSIONAL REGULATION
of the State of Illinois

BY:


Clerk for the Department

All inquiries should be
Directed to:
Chicago Office: 312-814-4504
PERCs only: 217-785-0820

STATE OF ILLINOIS)
)
COUNTY OF SANGAMON) ss:

UNDER PENALTY of perjury, as provided by law pursuant to Section 1-109 of the Illinois Code of Civil Procedure, the undersigned Certifies that I caused copies of the attached NOTICE AND CONSENT OR ORDER, to be deposited in the United States mail, by certified mail at 320 W. Washington, Springfield, Illinois 62786, before 5:00 p.m. with proper postage prepaid on the 19th day of July, 2016 to all parties at the addresses listed on the attached documents.



AFFIANT



Ohio Board of Nursing

www.nursing.ohio.gov

17 South High Street, Suite 400 • Columbus, Ohio 43215-7410 • (614) 466-3947

BEFORE THE OHIO BOARD OF NURSING

IN THE MATTER OF:

CASE # 2015-001956

SHERI BRADSHAW, RN

ORDER

On July 31, 2015, the Ohio Board of Nursing issued a Notice of Opportunity for Hearing to **SHERI BRADSHAW, RN**, informing her that the Board intended to consider disciplinary action regarding **MS. BRADSHAW's** license to practice nursing as a registered nurse in the State of Ohio, and that **MS. BRADSHAW** was entitled to a hearing if such hearing was requested within thirty (30) days of the mailing of said notice.

In accordance with Section 119.07, Ohio Revised Code, said notice was sent via certified mail, return receipt requested, to the address of record of **MS. BRADSHAW**.

No hearing request has been received from **MS. BRADSHAW** and more than thirty (30) days have now elapsed since the mailing of the notice.

Upon consideration of the charges stated against **SHERI BRADSHAW** in the July 31, 2015 Notice of Opportunity for Hearing and evidence supporting the charges, the Board finds that **MS. BRADSHAW** has committed acts in violation of the Nurse Practice Act, Ohio Revised Code Chapter 4723, as stated in the Notice of Opportunity for Hearing, and the Ohio Board of Nursing **ORDERS** that **MS. BRADSHAW's** license to practice nursing as a registered nurse is hereby suspended for an indefinite period of time with the conditions for reinstatement set forth below.

REQUIREMENTS AND CONDITIONS FOR REINSTATEMENT

1. **MS. BRADSHAW** shall obey all federal, state, and local laws, and all laws and rules governing the practice of nursing in Ohio.
2. **MS. BRADSHAW** shall appear in person for interviews before the full Board or its designated representative as requested by the Board or its designee.
3. **Prior to requesting reinstatement by the Board, MS. BRADSHAW** shall submit a request to the Bureau of Criminal Identification and Investigation (BCII) to conduct a

criminal records check of **MS. BRADSHAW**, including a check of Federal Bureau of Investigation (FBI) records, and shall cause BCII to submit **MS. BRADSHAW's** criminal records check reports to the Board. A request for reinstatement will not be considered by the Board until the completed criminal records check, including the FBI check, has been received by the Board.

4. **Prior to requesting reinstatement by the Board, MS. BRADSHAW** shall submit documentation of her full compliance with the terms and conditions imposed by the Consent Order issued by the Virginia Board of Nursing dated March 25, 2015, and that her Virginia license is fully reinstated and unencumbered.
5. **Prior to requesting reinstatement by the Board, MS. BRADSHAW** shall complete and submit satisfactory documentation of completion of a nurse refresher course or an extensive orientation approved in advance by the Board or its designee.

Monitoring

6. **Prior to requesting reinstatement by the Board, MS. BRADSHAW** shall, at her expense, obtain a psychiatric evaluation from a Board approved psychiatrist and shall provide the Board with complete documentation of such evaluation. Prior to the evaluation, **MS. BRADSHAW** shall provide the psychiatrist with a copy of this Order and the Notice of Opportunity for Hearing and shall execute releases to permit the psychiatrist to obtain any information deemed appropriate and necessary for the evaluation. The psychiatrist shall submit a written opinion to the Board that includes diagnoses, recommendations for treatment and monitoring, any additional restrictions that should be placed on **MS. BRADSHAW's** license, and a statement as to whether **MS. BRADSHAW** is capable of practicing nursing according to acceptable and prevailing standards of safe nursing care.
7. **MS. BRADSHAW** shall provide the Board with satisfactory documentation of compliance with all aspects of the treatment plan developed by the psychiatrist described above until released. Further, the Board may utilize the professional's recommendations and conclusions from the evaluation as a basis for additional terms and restrictions on **MS. BRADSHAW's** license.
8. **Prior to requesting reinstatement by the Board, MS. BRADSHAW** shall, at her expense, obtain a comprehensive physical examination by a Board approved physician for the purposes of evaluating **MS. BRADSHAW's** fitness for duty and safety to practice nursing as a registered nurse. This Board approved physician shall provide the Board with complete documentation of **MS. BRADSHAW's** comprehensive physical examination and with a comprehensive assessment regarding **MS. BRADSHAW's** fitness for duty and safety to practice nursing as a registered nurse. Prior to the examination, **MS. BRADSHAW** shall provide the Board approved physician with a copy of this Order and the Notice of Opportunity for Hearing. Further, **MS. BRADSHAW** shall execute releases to permit the Board approved physician performing the comprehensive physical examination and assessment to obtain any information deemed

appropriate and necessary for the assessment. The evaluating physician shall submit a written opinion to the Board that includes diagnoses, recommendations for treatment and monitoring, any additional restrictions that should be placed on **MS. BRADSHAW's** license to practice, and stating whether **MS. BRADSHAW** is capable of practicing nursing according to acceptable and prevailing standards of safe nursing care.

9. The Board may utilize the Board approved physician's recommendations and conclusions from the comprehensive physical examination and assessment as a basis for additional terms and restrictions on **MS. BRADSHAW's** license.

Reporting Requirements of MS. BRADSHAW

10. **MS. BRADSHAW** shall sign release of information forms allowing health professionals and other organizations to submit requested documentation or information directly to the Board.
11. **MS. BRADSHAW** shall submit any and all information that the Board may request regarding her ability to practice nursing according to acceptable and prevailing standards of safe nursing practice.
12. **MS. BRADSHAW** shall not submit or cause to be submitted any false, misleading, or deceptive statements, information, or documentation to the Board or to employers or potential employers.
13. **MS. BRADSHAW** shall submit the reports and documentation required by this Order on forms specified by the Board. All reporting and communications required by this Order shall be made to the Compliance Unit of the Board.
14. **MS. BRADSHAW** shall submit the reports and documentation required by this Order to the attention of the Compliance Unit, Ohio Board of Nursing, 17 South High Street, Suite 400, Columbus, OH 43215-7410.
15. **MS. BRADSHAW** shall verify that the reports and documentation required by this Order are received in the Board office.
16. **MS. BRADSHAW** shall inform the Board within five (5) business days, in writing, of any change in address and/or telephone number.

DURATION

The Board may only alter the indefinite suspension imposed if: (1) **MS. BRADSHAW** submits a written request for reinstatement; (2) the Board determines that **MS. BRADSHAW** has complied with all conditions of reinstatement; and (3) the Board determines that **MS. BRADSHAW** is able to practice nursing according to acceptable and prevailing standards of safe nursing care based upon an interview with **MS. BRADSHAW** and review of the documentation specified in this Order.

This ORDER shall become effective immediately and is hereby entered upon the Journal of the Board for the 19th day of May, 2016.

TIME AND METHOD TO PERFECT AN APPEAL

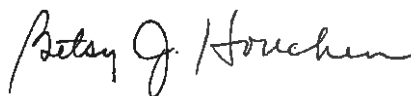
Any party desiring to appeal shall file a Notice of Appeal with the Ohio Board of Nursing, 17 S. High St., Suite 400, Columbus OH 43215-7410, setting forth the order appealed from and stating that the agency's order is not supported by reliable, probative, and substantial evidence and is not in accordance with law. The notice of appeal may, but need not, set forth the specific grounds of the party's appeal.

A copy of such Notice of Appeal shall also be filed by the appellant with the Franklin County Court of Common Pleas, Columbus, Ohio. In filing a notice of appeal with the agency or court, the notice that is filed may be either the original notice or a copy of the original notice. Such notices of appeal shall be filed within fifteen (15) days after the mailing of the notice of the Ohio Board of Nursing's Order as provided in Section 119.12 of the Ohio Revised Code.

CERTIFICATION

The State of Ohio
County of Franklin

I, the undersigned Betsy J. Houchen, Executive Director for the Ohio Board of Nursing, hereby certify that the foregoing is a true and exact reproduction of the original Order of the Ohio Board of Nursing entered on its Journal, on the 19th day of May, 2016.



Betsy J. Houchen, R.N., M.S., J.D.
Executive Director

May 19, 2016
Date

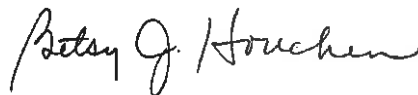
(SEAL)

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Order, concerning **SHERI BRADSHAW**, was sent via certified mail, return receipt requested, this 1st day of June, 2016 to **SHERI BRADSHAW**, at the following addresses:

- 1) 13701 River Tree Ct., Apt #102, Chester, VA 23836;
- 2) 103 S. 4th Avenue, Hopewell, VA 23860;
- 3) 4283 Baxter Rd., Prince George, VA 23875-2927.

I also certify that a copy of the same was sent via regular U.S. mail this 1st day of June, 2016, to Lamont Pugh, SAC, Sanctions & Exclusions, Department of Health and Human Services, Office of Inspector General, Office of Investigations, P.O. Box 81020, Chicago, IL 60601-81020.



Betsy J. Houchen, R.N., M.S., J.D.
Executive Director

bah

cc: Henry G. Appel, Principal Assistant Attorney General

Certified Mail Receipt No. 7015 3430 0001 1695 3497
Second Address Certified Mail Receipt No. 7015 3430 0001 1695 3503
Third Address Certified Mail Receipt No. 7015 3440 0001 1695 3510

COPY

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BEFORE THE STATE BOARD OF NURSING

PROTHONOTARY
2016 AUG 24 AM 7:33
Department of State

Commonwealth of Pennsylvania
Bureau of Professional and
Occupational Affairs
vs.
Sheri Randolph Bradshaw, RN,
Respondent

Docket No. 1867-51-15
File No. 15-51-07620

FINAL ORDER ADOPTING HEARING EXAMINER'S PROPOSED ADJUDICATION
AND SUBSTITUTING BOARD ORDER

AND NOW, this 24th day of August, 2016, the State Board of Nursing (Board), having reviewed the evidentiary record of this proceeding, together with the hearing examiner's Proposed Adjudication and Order, and noting that neither party filed exceptions to the hearing examiner's proposal, hereby **ORDERS** that the Proposed Adjudication of the hearing examiner, filed April 13, 2016, including the Proposed Findings of Fact, Proposed Conclusions of Law and Discussion, be, except for the Proposed Order, adopted as the **FINAL** Adjudication of the Board in this proceeding. A copy of the hearing examiner's Proposed Adjudication and Order is attached to this Order as **Appendix A**.

Because Respondent failed to report the Virginia disciplinary action to the Board, the Board concludes that the imposition of a \$250.00 civil penalty is not sufficient to deter Respondent and others from committing similar violations. Instead the Board concludes that it must impose a civil penalty of \$500.00 on Respondent. Accordingly, the Board will substitute its own **FINAL ORDER** as follows:

ORDER

AND NOW, this 24th day of August, 2016, the State Board of Nursing, based upon the foregoing Findings of Fact, Conclusions of Law and Discussion, hereby levies a civil penalty of \$500.00 and **SUSPENDS INDEFINITELY** the license of Respondent, Sheri Randolph Bradshaw, license no. RN-596052, until such time as she demonstrates that she has obtained an unrestricted license in the state of Virginia.

The civil penalty shall be paid by cashier's check, certified check, attorney's check or US Postal Service money order payable to "Commonwealth of Pennsylvania." Respondent shall return to the Board all licensure documents, including wall certificate and wallet card. The full amount of the civil penalty and the licensure documents shall be remitted to Board Counsel,

TRUE AND CORRECT COPY
CERTIFIED FROM THE RECORD
THIS 22nd DAY OF Sept A.D. 2016

Kimberly Ordson
PROTHONOTARY

Bureau of Professional and Occupational Affairs, P.O. Box 69523, Harrisburg, PA 17106-9523, on or before, September 23, 2016, 30 days from the date of mailing of this Order.

If Respondent does not pay the civil penalty by the due date, she may not petition to have her license reinstated until it is paid in full.

Respondent may Petition for Reinstatement of his license upon providing the following documentation:

(a) Evidence from the proper authority in Virginia demonstrating that Respondent's license has been restored to active, non-probationary, unrestricted status;

(b) A current Criminal History Record Information (a/k/a "Criminal Record Check") from a governmental agency from all states where Respondent has resided since the suspension, compiled no more than three months prior to the Petition for Reinstatement; and

(c) A signed verification that Respondent has not practiced nursing since the suspension.

Following receipt of the documentation, a formal hearing will be held on Respondent's Petition. At the hearing, Respondent will have the burden to prove that she can resume the competent practice of professional nursing with reasonable skill and safety to patients.

This Order is effective immediately. The sanction becomes effective 30 days from the date of mailing of this Order, namely, September 23, 2016.

**BUREAU OF PROFESSIONAL AND
OCCUPATIONAL AFFAIRS**



**IAN J. HARLOW
COMMISSIONER**

BY ORDER:

STATE BOARD OF NURSING



**KRISTIN MALADY, RN, BSN
CHAIRMAN**

Respondent's Address:

Sheri Randolph Bradshaw, RN
4283 Baxter Road
Prince George, VA 23875

Commonwealth's Attorney:

T'rese M. Evancho, Esquire

Board Counsel:

Megan E. Castor, Esquire

Date of Mailing:

August 24, 2016

NOTICE

The attached Final Order represents the final agency decision in this matter. It may be appealed to the Commonwealth Court of Pennsylvania by the filing of a Petition for Review with that Court within 30 days after the entry of the order in accordance with the Pennsylvania Rules of Appellate Procedure. See Chapter 15 of the Pennsylvania Rules of Appellate Procedure entitled "Judicial Review of Governmental Determinations," Pa. R.A.P 1501 – 1561. Please note: An order is entered on the date it is mailed. If you take an appeal to the Commonwealth Court, you must serve the Board with a copy of your Petition for Review. The agency contact for receiving service of such an appeal is:

Board Counsel
P.O. Box 69523
Harrisburg, PA 17106-9523

The name of the individual Board Counsel is identified on the Final Order.

ORIGINAL

RECEIVED
AUG 23 2010
Department of State
Prothonotary

**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BEFORE THE STATE BOARD OF NURSING**

**Commonwealth of Pennsylvania,
Bureau of Professional and
Occupational Affairs**

v.

**Sheri Randolph Bradshaw, R.N.
Respondent**

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**Docket no. 1867-51-15
File no. 15-51-07620**

PROPOSED ADJUDICATION AND ORDER

**Ruth D. Dunnewold
Hearing Examiner**

**COMMONWEALTH OF PENNSYLVANIA
GOVERNOR'S OFFICE OF GENERAL COUNSEL
DEPARTMENT OF STATE
OFFICE OF HEARING EXAMINERS
P.O. Box 2649
Harrisburg, PA 17105-2649**

DATE DISTRIBUTED 4/13/16
PROSECUTION _____
COUNSEL _____
HEARING EXAMINER _____
OTHER -R

HISTORY

This matter was initiated by the filing of a two-count order to show cause alleging that Sheri Randolph Bradshaw, R.N. ("Respondent"), violated the Professional Nursing Law¹ ("R.N. Law"). More specifically, the order to show cause alleged that Respondent's professional nurse license in the Commonwealth of Virginia was disciplined by that Commonwealth's nurse licensing authority, subjecting Respondent to disciplinary action by this State Board of Nursing ("Board") pursuant to the R.N. Law at section 14(a)(6), 63 P.S. § 224(a)(6), and that Respondent failed to report the Virginia disciplinary action to the Board as required under the R.N. Law at section 11.1, 63 P.S. § 221.1, which subjects her to the imposition of disciplinary sanctions by the Board under section 14(a)(3), 63 P.S. § 224(a)(3).

The Commonwealth filed its order to show cause on October 22, 2015. On December 21, 2015, Respondent filed a letter in response, admitting the underlying discipline by the Virginia Board of Nursing ("Virginia Board"). A formal hearing on the charges was held February 23, 2016. The Commonwealth was represented by T'rese M. Evancho, Prosecuting Attorney, while neither Respondent nor anyone on her behalf appeared. The record was closed with the filing of the hearing transcript on March 15, 2016.

¹R.N. Law of May 22, 1951, P.L. 317, *as amended*, 63 P.S. § 211 *et seq.*

FINDINGS OF FACT

1. Respondent holds a license to practice as a registered nurse in the Commonwealth of Pennsylvania, license no. RN596052, which was originally issued on July 18, 2008, expired on October 31, 2015, and absent further action by the Board, may be renewed, reactivated or reinstated upon the filing of the appropriate documentation and payment of the necessary fees. Official notice of Board records.²
2. At all pertinent times, Respondent held a license to practice as a registered nurse in the Commonwealth of Pennsylvania. *Id.*
3. Respondent's last-known address on file with the Board is 13701 River Tree Court, Apartment 102, Chester, Virginia 23836. *Id.*
4. Respondent's current address is 4283 Baxter Road, Prince George, Virginia 23875. Exhibit C-2.
5. On July 9, 2002, the Virginia Board issued Respondent license no. 0001-179588 to practice professional nursing ("Virginia license"). Exhibit C-3, paragraph 1.
6. In Finding of Fact No. 3 of a Consent Order entered March 25, 2015 by the Virginia Board ("Virginia Consent Order"), Respondent admitted that her psychiatrist did not feel she was safe to practice at that time. Exhibit C-3, Finding of Fact 3 and Consent paragraph 5.
7. The Virginia Consent Order included a conclusion of law finding that Finding of Fact No. 3 constitutes a violation of Virginia law. Exhibit C-3, Conclusions of Law.

²At the hearing, the Commonwealth asked that official notice be taken of the Board's licensing records pertaining to Respondent, and that requested was granted. Notes of Testimony at 7. A licensing board may take official notice of its own records pursuant to the General Rules of Administrative Practice and Procedure, 1 Pa. Code § 31.1 *et seq.*, at § 35.173. *See also Gleeson v. State Bd. of Medicine*, 900 A.2d 430, 440 (Pa. Cmwlth. 2006), *appeal denied*, 917 A.2d 316 (Pa. 2007). All citations in this proposed decision to "Board records" rely on that taking of official notice.

8. In the Virginia Consent Order, the Virginia Board accepted Respondent's voluntary surrender for indefinite suspension of Respondent's Virginia license and indicated that Respondent's license in Virginia would be recorded as suspended and no longer current. Exhibit C-3, Order paragraphs 1 and 2.

9. At no time did Respondent notify the Board that the Virginia Board had taken disciplinary action against her professional nursing license in Virginia by entering the Virginia Consent Order. Exhibit C-4.

10. Respondent received the order to show cause and all other filings in this matter, filed an answer, and had the opportunity to appear at a hearing in the matter. Board records at Docket No. 1867-51-15.

CONCLUSIONS OF LAW

1. The Board has jurisdiction in this matter. Findings of Fact 1, 2.
2. Respondent received notice of this proceeding and was afforded an opportunity to be heard in accordance with section 4 of the Administrative Agency Law, 2 Pa. C.S. § 504. Finding of Fact 10.
3. Based on the Virginia disciplinary matter, Respondent has received disciplinary action by the proper licensing authority in another state, authorizing the Board to impose disciplinary sanctions on her pursuant to the R.N. Law at section 14(a)(6), 63 P.S. § 224(a)(6). Findings of Fact 5 – 8.
4. Respondent failed to report the Virginia Consent Order to the Board at any time, repeatedly violating the R.N. Law at section 11.1, 63 P.S. § 221.1, which authorizes the Board to impose disciplinary sanctions upon her pursuant to the R.N. Law at section 14(a)(3), 63 P.S. § 224(a)(3). Findings of Fact 5 – 9.

DISCUSSION

Violation

This action was brought under the R.N. Law at section 11.1, 63 P.S. § 221.1, as well as subsections 14(a)(3) and (6), 63 P.S. § 224(a)(3) and (6). The relevant portions of those provisions read as follows:

Section 11.1. Reporting of Multiple Licensure.--

* * *

Any disciplinary action taken in other states shall be reported to the Board on the biennial registration application or within ninety (90) days of final disposition, whichever is sooner. . . .

* * *

63 P.S. § 221.1.

Section 14. Refusal, Suspension or Revocation of Licenses.--(a) The Board may refuse, suspend or revoke any license in any case where the Board shall find that—

(3) The licensee has wilfully or repeatedly violated any of the provisions of this act or of the regulations of the Board.

* * *

(6) The licensee has his or her license suspended or revoked or has received other disciplinary action by the proper licensing authority in another state, territory, possession or country.

* * *

63 P.S. § 224(a)(3) and (6).

In Count One, the Commonwealth charged that Respondent's R.N. license in Pennsylvania is subject to disciplinary action because her registered nurse license in Virginia has been disciplined by the Virginia Board. Respondent admitted in her answer to the order to show cause that she had been disciplined in Virginia. Additionally, the Commonwealth placed in the

record at the hearing a certified copy of the discipline imposed by the Virginia Board through its entering the Consent Order. Accordingly, the Commonwealth has met its burden of proof³ as to Count One of the order to show cause.

In Count Two, the Commonwealth alleged that Respondent failed to report the Virginia Consent Order to the Board at any time, in violation of the R.N. Law at section 11.1, 63 P.S. § 221.1, which subjects her to the imposition of disciplinary sanctions by the Board under section 14(a)(3), 63 P.S. § 224(a)(3), because Respondent's failure to report constituted a willful or repeated violation of section 11.1, a provision of the R.N. Law. In support of this allegation, the Commonwealth placed into the record a Certificate and Attestation by the custodian of the Board's records which stated that there is no record that Respondent reported the Virginia Consent Order to the Board on her renewal application or at any other time. *See* Exhibit C-4.

To warrant the imposition of discipline under the language of section 14(a)(3), 63 P.S. § 224(a)(3), the licensee must "wilfully or repeatedly" violate the R.N. Law. "Willful" means something is "done deliberately or intentionally." WEBSTER'S NEW WORLD DICTIONARY 1528 (3d coll. ed. 1994). Here, the Commonwealth produced no evidence that Respondent deliberately or intentionally failed to report the Virginia Consent Order. However, under the applicable provision, Respondent was required to report it on her biennial registration application or within ninety (90) days of final disposition, whichever was sooner. Because Respondent did not renew her license in the Commonwealth but allowed it to expire on October 31, 2015, Respondent has

³The degree of proof required to establish a case before an administrative tribunal in an action of this nature is a preponderance of the evidence. *Lansberry v. Pennsylvania Public Utility Commission*, 578 A.2d 600, 602 (Pa. Cmwlth. 1990). A preponderance of the evidence is generally understood to mean that the evidence demonstrates a fact is more likely to be true than not to be true, or if the burden were viewed as a balance scale, the evidence in support of the Commonwealth's case must weigh slightly more than the opposing evidence. *Se-Ling Hosiery, Inc. v. Margulies*, 70 A.2d 854, 856 (Pa. 1949). The Commonwealth therefore has the burden of proving the charges against Respondent with evidence that is substantial and legally credible, not by mere "suspicion" or by only a "scintilla" of evidence. *Lansberry*, 578 A.2d at 602.

not filed a biennial registration application since the Virginia Consent Order was entered, so she did not violate the R.N. Law by failing to report it on her biennial registration application.

On the other hand, Respondent was required under the R.N. Law to report the Virginia Consent Order within 90 days of the date it was entered, March 25, 2015, and she has never done so. Each day that she fails to report it repeats her violation of that requirement. Therefore, she has engaged in repeated violations of section 11.1, 63 P.S. § 221.1. It follows that the Commonwealth has sustained its burden of proving that Respondent has repeatedly violated a provision of the R.N. Law, thus subjecting her to the imposition of discipline pursuant to section 14(a)(3), 63 P.S. § 224(a)(3), as alleged in Count Two.

Sanction

The only other question is what sanction is appropriate. The R.N. Law at section 14(b), 63 P.S. § 224(b), authorizes the Board to take the following actions in the face of a violation of section 14(a) of the R.N. Law, 63 P.S. § 224(a):

§ 224. Refusal, suspension or revocation of licenses

* * *

(b) When the Board finds that the license of any nurse may be refused, revoked or suspended under the terms of subsection (a), the Board may:

* * *

- (1) Deny the application for a license.
- (2) Administer a public reprimand.
- (3) Revoke, suspend, limit or otherwise restrict a license as determined by the Board.
- (4) Require a licensee to submit to the care, counseling or treatment of a physician or a psychologist designated by the Board.

(5) Suspend enforcement of its finding thereof and place a licensee on probation with the right to vacate the probationary order for noncompliance.

(6) Restore or reissue, in its discretion, a suspended license to practice professional or practical nursing and impose any disciplinary or corrective measures which it might originally have imposed.

* * *

The Board is the agency charged with the responsibility and authority to oversee and regulate the nursing profession. *Leukhardt v. Com., State Bd. of Nurse Examiners, Bur. of Professional and Occupational Affairs*, 403 A.2d 645 (Pa. Cmwlth. 1979). As discussed above, the Board is authorized by statute to impose disciplinary or corrective measures on its licensees when they engage in various types of prohibited conduct. 63 P.S. § 224(a) and (b). The Board, like other licensing boards, is granted broad latitude in fashioning those measures. *Yousufzai v. State Board of Medicine*, 793 A.2d 1008 (Pa. Cmwlth. 2002); *Telang v. Com., State Board of Medicine*, 751 A.2d 1147, 1152 (Pa. 2000).

With that in mind, it is appropriate in a disciplinary case to consider any evidence in the record which may serve to mitigate any proposed penalty. In this case, it is clear from the Virginia Consent Order that the basis for the Virginia Board's imposition of discipline on Respondent's license was her mental health, which gave rise to the possibility that she is not able to practice safely. In other words, Respondent has not committed any practice violations which led to discipline. Rather, she is ill. This is a mitigating factor.

Nonetheless, the facts which Respondent admitted in the Virginia Consent Order call into question her ability to practice nursing safely, and the safe practice of nursing by its licensees is the prime concern of this Board. At the hearing, the Commonwealth recommended that Respondent's license in the Commonwealth be indefinitely suspended until such time as her

license in Virginia is reinstated to unrestricted status, and that she be assessed a civil penalty of \$250 for her failure to report the Virginia Consent Order to the Board. An indefinite suspension tied to the restoration of her license in Virginia both mirrors the sanction imposed by the Virginia Board and affords to Pennsylvania's citizens the same protection Virginia afforded to its citizens.

As for the civil penalty which the Commonwealth recommended, in order for the Board to properly police the profession, licensees must promptly provide accurate information about their disciplinary actions to the Board either separately, within 90 days, or on their license renewal applications, whichever is sooner. The recommended monetary penalty will serve as a reminder to Respondent, as well as to similarly situated licensees, of their responsibility to act promptly in order to keep the Board apprised of their disciplinary status in other jurisdictions.

Under the totality of the circumstances, the Commonwealth's overall recommendation is reasonable. Accordingly, the following proposed order will issue:

**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE
BEFORE THE STATE BOARD OF NURSING**

**Commonwealth of Pennsylvania,
Bureau of Professional and
Occupational Affairs**

v.

**Sheri Randolph Bradshaw, R.N.
Respondent**

:
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:

**Docket no. 1867-51-15
File no. 15-51-07620**

PROPOSED ORDER

AND NOW, this 13th day of **April, 2016**, upon consideration of the foregoing findings of fact, conclusions of law and discussion, it is hereby ordered that the license to practice professional nursing of Respondent **Sheri Randolph Bradshaw, R.N.**, license no. **RN596052**, is **INDEFINITELY SUSPENDED** until such time as her license to practice nursing in the Commonwealth of Virginia has been restored to unrestricted, non-probationary status.

IT IS FURTHER ORDERED that Respondent shall pay a total **CIVIL PENALTY** of **\$250** within 30 days of the Board's Final Order in this matter. The civil penalty shall be paid by certified check, attorney's check or U.S. Postal Service money order, made payable to "Commonwealth of Pennsylvania," and shall be mailed to:

Board Counsel
State Board of Nursing
P.O. Box 69523
Harrisburg, PA 17106-9523

within 30 days of the date of the Board's Final Order in this matter.

Respondent shall surrender her licensure documents, including her wall certificate, registration certificate, wallet card, and other licensure documents, by the effective date of the Final Order issued in this matter by forwarding them to the Board counsel at the same address set

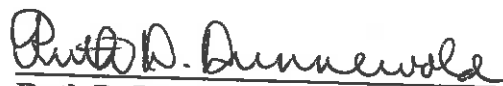
forth above for payment of the civil penalty.

Upon the restoration of her Virginia license to active, unrestricted, non-probationary status, Respondent may file with this Board a written petition for reinstatement of her Pennsylvania license to active, unrestricted, non-probationary status. Respondent shall include with her petition for reinstatement original source documentation demonstrating that her license to practice medicine in Virginia has been reinstated to active, unrestricted, non-probationary status. **Payment of the civil penalty assessed by this Order shall be an additional prerequisite to the reinstatement of Respondent's license to practice professional nursing in the Commonwealth.**

At the Board's discretion, prior to reinstatement, Respondent may be required to prove at a formal hearing before the Board or its designee that her license in Virginia has been restored to active, unrestricted, non-probationary status, and that she is able to practice the profession with reasonable skill and safety to patients.

The State Board of Nursing has announced its intention to review this Proposed Report in accordance with 1 Pa. Code § 35.226(a)(2).

BY ORDER



**Ruth D. Dunnewold
Hearing Examiner**

For the Commonwealth:

T'rese M. Evancho, Esquire
GOVERNOR'S OFFICE OF GENERAL COUNSEL
DEPARTMENT OF STATE OFFICE OF CHIEF COUNSEL
PROSECUTION DIVISION
P.O. Box 69521
Harrisburg, PA 17106-9521

For Respondent:

Sheri Randolph Bradshaw, R.N.
4283 Baxter Rd.

Prince George, VA 23875

Date of mailing:

4/13/16



NOTICE

SERVICE OF PROPOSED REPORT:

The foregoing is the proposed report issued in this matter by a Hearing Examiner for the Department of State, in accordance with the General Rules of Administrative Practice and Procedure at 1 Pa. Code §35.207.

EXCEPTIONS TO PROPOSED REPORT:

Any participant who wishes to appeal all or part of the Hearing Examiner's proposed report to the Board must file exceptions in the form of a *Brief on Exceptions* with the Prothonotary of the Department of State within 30 days after the date of mailing shown on this proposed report in accordance with the General Rules of Administrative Practice and Procedure at 1 Pa. Code §§35.211-214.

The *Brief on Exceptions* shall contain a short statement of the case, a summary of the appealing party's position, the grounds for filing exceptions to the proposed report, and the argument in support of the appealing party's position with citations to the record and legal authority. The appealing party may also include proposed findings of fact and conclusions of law.

In the event any participant files exceptions, the Board may substitute its findings for those of the Hearing Examiner, and /or may impose a greater or lesser sanction than that imposed by the Hearing Examiner without regard to the relief requested or the position argued by any party, and without hearing additional argument or facing additional evidence.

Failure to file a *Brief on Exceptions* within the time allowed under the General Rules of Administrative Practice and Procedure at 1 Pa. Code §§35.211-214 shall constitute a waiver of all objections to the proposed report.

FILING AND SERVICES:

An original and three (3) copies of the *Brief on Exceptions* shall be filed with:

Prothonotary
2601 North Third Street
P. O. Box 2649
Harrisburg, PA 17105-2649

Copies of the *Brief on Exceptions* must also be served on all participants to the proceeding.

Briefs on Exceptions must be received for filing by the Prothonotary within the time limits specified herein. Date of receipt by the Office of Prothonotary and not date of deposit in the mail is determinative.



I do hereby certify the foregoing to be a true and certified copy of the document on file with the Massachusetts Board of Registration in Nursing.

Auth. Sign 8/27/16
Date

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK COUNTY

BOARD OF REGISTRATION
IN NURSING

In the Matter of
Sheri Randolph Bradshaw
License No. RN281983
Expire 11/24/2014

Docket No. NUR-2015-0099

CONSENT AGREEMENT FOR VOLUNTARY SURRENDER

The Massachusetts Board of Registration in Nursing (Board) and Sheri Randolph Bradshaw (Licensee), a Registered Nurse (RN) licensed by the Board, License No. RM281983 do hereby stipulate and agree that the following information shall be entered into and become a permanent part of the Licensee's record maintained by the Board:

1. The Licensee acknowledges that a complaint has been filed with the Board against her Massachusetts Registered Nurse license (license¹) related to the conduct set forth in paragraph 2, identified as Docket No. NUR-2015-0099 (Complaint).
2. The Licensee admits that while holding a right to renew her Massachusetts RN license the Licensee agreed to a "Voluntary Surrender for an Indefinite Suspension" of her Virginia RN license (attached hereto as Exhibit 1). The Licensee acknowledges that her conduct constitutes failure to comply with the Board's Standards of Conduct at 244 Code of Massachusetts Regulations (CMR) 9.03 (47) and warrants disciplinary action by the Board under Massachusetts General Laws (G.L.) Chapter 112, section 61 and Board regulations at 244 CMR 7.04, Disciplinary Actions.
3. The Licensee agrees to SURRENDER her nursing license and right to renew said license for an indefinite period commencing with the date on which the Board signs this Agreement (Effective Date).
4. After the Surrender Period when the Licensee can complete to the satisfaction of the Board all of the requirements set forth in this Paragraph the Licensee may petition the Board for reinstatement of her license. The petition must be in

SRO

¹ The term "license" applies to both a current license and the right to renew an expired license.

writing and must include the following documentation of the Licensee's ability to practice nursing in a safe and competent manner, all to the Board's satisfaction:

- a. Evidence of completion of all continuing education required by Board regulations for the two (2) renewal cycles immediately preceding the date on which the Licensee submits her petition ("petition date");
- b. A performance evaluation sent directly to the Board from each of the Licensee's employers, prepared on official letterhead that reviews the Licensee's attendance, general reliability, and specific job performance during the year immediately prior to the petition date²;
- c. Written verification sent directly to the Board from each of the Licensee's medical care providers, which meets the requirements set forth in Attachment B1;
- d. A report of a mental health evaluation, prepared within thirty (30) days of the petition date and sent directly to the Board, which meets the requirements set forth in Attachment B 2,
- e. Authorization for the Board to obtain a Criminal Offender Record Information (CORI) report of the Licensee conducted by the Massachusetts Department of Criminal Justice Information Services.
- f. Documentation that the Licensee has completed, at least one (1) year prior to the petition date, all requirements imposed upon her in connection with all criminal and/or administrative matter(s) arising from, or related to, the conduct identified in Paragraph 2³. Such documentation shall be certified and sent directly to the Board by the appropriate court or administrative body and shall include a description of the requirements and the disposition of each matter.
- g. Certified documentation from the state board of nursing of each jurisdiction in which the Licensee has ever been licensed to practice as a nurse, sent directly to the Massachusetts Board identifying her license status and discipline history, and verifying that her nursing license is, or is eligible to be, in good standing and free of any restrictions or conditions.

SRB

² If the Licensee has not been employed during the year immediately prior to the petition date, Licensee shall submit an affidavit to the Board so attesting.

³ If there have been no criminal or administrative matters against the Licensee arising from or in any way related to the conduct identified in Paragraph 2, the Licensee shall submit an affidavit so attesting.

5. The Board may choose to reinstate the Licensee's license if the Board determines that reinstatement is in the best interests of the public at large. Any reinstatement of the Licensee's license may be conditioned upon the Licensee entering into a consent agreement for the PROBATION of his license for at least one (1) year including other requirements that the Board determines at the time of relicensure to be reasonably necessary in the best interests of the public health, safety and welfare.
6. The Licensee agrees that she will not practice as a Registered Nurse in Massachusetts from the Effective Date unless and until the Board reinstates her license.⁴
7. The Board agrees that in return for the Licensee's execution of this Agreement it will not prosecute the complaint.
8. The Licensee understands that she has a right to formal adjudicatory hearing concerning the allegations against her and that during said adjudication she would possess the right to confront and cross-examine witnesses, to call witnesses, to present evidence, to testify on her own behalf, to contest the allegations, to present oral argument, to appeal to the courts, and all other rights as set forth in the Massachusetts Administrative Procedures Act, G. L. c. 30A, and the Standard Adjudicatory Rules of Practice and Procedure, 801 CMR 1.01 *et seq.* The Licensee further understands that by executing this Agreement she is knowingly and voluntarily waiving her right to a formal adjudication of the complaints.
9. The Licensee acknowledges that she has been at all times free to seek and use legal counsel in connection with the complaint and this Agreement.
10. The Licensee acknowledges that after the Effective Date, the Agreement constitutes a public record of disciplinary action by the Board. The Board may forward a copy of this Agreement to other licensing boards, law enforcement entities, and other individuals or entities as required or permitted by law.
11. The Licensee certifies that she has read this Agreement. The Licensee understands and agrees that entering into this Agreement is a final act and not subject to reconsideration, appeal or judicial review.

SRB

⁴ The Licensee understands that practice as a Registered Nurse includes, but is not limited to, seeking and/or accepting a paid or voluntary position as a Registered Nurse or a paid or voluntary position requiring that the applicant hold a current Registered Nurse license. The Licensee further understands that if she accepts a voluntary or paid position as a Registered Nurse or engages in any practice of nursing after the Effective Date and before the Board formally reinstates her license, evidence of such practice shall be grounds for the Board's referral of any such unlicensed practice to the appropriate law enforcement authorities for prosecution, as set forth in G. L. c. 112, ss. 65 and 80.

Sheri Randolph 8/8/16
Sheri Randolph Bradshaw (sign and date)

Andrew Wells
Witness Print

A Wells 08 Aug 16
Witness (sign and date)

Lorena M. Silva
Lorena M. Silva, MSN-L, MBA, DNP, RN
Executive Director
Board of Registration in Nursing

August 22nd, 2016
Effective Date of Surrender Agreement

Fully Signed Agreement Sent to Licensee on 8/22/16 by Certified

Mail No. 7016 0340 0000 4976 0687

Sheri Randolph Bradshaw
License No: RN281983
NUR-2015-0099

**STATE OF WASHINGTON
DEPARTMENT OF HEALTH
NURSING CARE QUALITY ASSURANCE COMMISSION**

In the Matter of

No. M2015-604

SHERI RANDOLPH BRADSHAW
Credential No. RN.RN.60331275

**FINDINGS OF FACT,
CONCLUSIONS OF LAW AND
FINAL ORDER OF DEFAULT
(Failure to Respond)**

Respondent

This matter is before the presiding officer, on designation by the Nursing Care Quality Assurance Commission (Commission), for final order of default. Based on the record, the presiding officer issues the following:

1. FINDINGS OF FACT

1.1 On May 23, 2013, the State of Washington issued Respondent a credential to practice as a registered nurse. Respondent's credential is currently expired.

1.2 On March 25, 2015, the Virginia State Board of Nursing (Virginia Board) entered an Order In Re: Sheri R. Bradshaw, R.N. License No. 0001-179588 (Virginia Order) for indefinite suspension after accepting Respondent's voluntary surrender of her registered nurse credential. Respondent surrendered her license after she was diagnosed with a major mental health disorder and her psychiatrist determined that she is not safe to practice nursing at this time.

1.3 On June 25, 2015, the Commission served Respondent with a copy of the following documents at Respondent's last known address:

- A. Statement of Charges;
- B. Notice of Your Legal Rights; and
- C. Answer to Statement of Charges and Request for Settlement and Hearing (Answer).

1.4 The Answer was due in the Adjudicative Clerk Office by July 15, 2015.
RCW 18.130.090.

1.5 The Adjudicative Clerk Office has not received the Answer. On July 16, 2015, the Adjudicative Clerk Office issued a Notice of Failure to Respond.

ORIGINAL

1.6 The Commission has no reason to believe Respondent is now on active duty in the U.S. armed forces.

2. CONCLUSIONS OF LAW

2.1 The Commission has jurisdiction over Respondent and over the subject matter of this case, RCW 18.130.040.

2.2 Respondent did not file a request for hearing within the time allowed. RCW 18.130.090(1). Respondent is in default, and the Commission may issue a final order based on the evidence presented. RCW 18.130.090(1) and RCW 34.05.440.

2.3 Respondent has committed unprofessional conduct in violation of RCW 18.130.180(5).

2.4 The above violation provides grounds for imposing sanctions under RCW 18.130.160.

3. COMPLIANCE WITH SANCTION RULES

3.1 The disciplining authority applies WAC 246-16-800, *et seq.*, to determine appropriate sanctions. WAC 246-16-800(2)(b)(iv) provides that "indefinite suspension may be imposed in default and waiver of hearing orders."

3.2 The sanction of indefinite suspension adequately addresses the alleged facts of this case and is sufficient to protect the public.

4. ORDER

The COMMISSION ORDERS:

4.1 Respondent's credential to practice as a registered nurse in the state of Washington is **INDEFINITELY SUSPENDED**.

4.2 Respondent may petition for reinstatement pursuant to RCW 18.130.150. The disciplining authority may agree to an order of reinstatement. If the disciplining authority does not agree, a hearing may be held on the petition. An order of reinstatement based on agreement or following a hearing may impose any terms and conditions listed in RCW 18.130.160 deemed necessary by the disciplining authority to protect the public and/or rehabilitate Respondent's practice.

4.3 Within sixty (60) days prior to any petition for reinstatement, Respondent shall undergo a psychiatric or psychological evaluation by a psychiatrist or psychologist pre-approved by the Commission. Prior to the evaluation, Respondent shall provide the

evaluator with a copy of this Agreed Order and the Virginia State Board of Nursing Consent Order. The evaluator shall make reference to the Washington State and Virginia State orders. Respondent shall ensure that a copy of the evaluator's report is provided to the Commission within thirty (30) days of its completion. Respondent shall comply with all treatment or follow up care recommendations made by the evaluator.

4.4 Respondent shall assume all costs of complying with this Order.

4.5 The effective date of this Order is that date the Adjudicative Clerk Office places the signed order into the U.S. mail.

5. NOTICE TO PARTIES

This Order will be reported to the National Practitioner Databank (45 CFR Part 60) and elsewhere as required by law. It is a public document and will be placed on the Department of Health's website and otherwise disseminated as required by the Public Records Act (Chap. 42.56 RCW) and the Uniform Disciplinary Act. RCW 18.130.110.

Any Party may file a petition for reconsideration. RCW 34.05.461(3); RCW 34.05.470. The petition must be filed within ten (10) days of service of this Order with:

Adjudicative Clerk Office
Adjudicative Service Unit
PO Box 47879
Olympia, WA 98504-7879

and a copy must be sent to:

State of Washington
Department of Health
Nursing Care Quality Assurance Commission
PO Box 47864
Olympia, WA 98504-7864

The petition must state the specific grounds upon which reconsideration is requested and the relief requested. The petition for reconsideration is considered denied twenty (20) days after the petition is filed if the Adjudicative Clerk Office has not responded to the petition or served written notice of the date by which action will be taken on the petition.

A petition for judicial review must be filed and served within thirty (30) days after service of this Order. RCW 34.05.542. The procedures are identified in chapter 34.05 RCW, Part V, Judicial Review and Civil Enforcement. A petition for reconsideration is not required before seeking judicial review. If a petition for reconsideration is filed, however, the thirty (30) day period will begin to run upon the resolution of that petition. RCW 34.05.470(3).

The Order remains in effect even if a petition for reconsideration or petition for review is filed. "Filed" means actual receipt of the document by the Adjudicative Clerk Office. RCW 34.05.010(6). This Order was "served" upon you on the day it was deposited in the United States mail. RCW 34.05.010(19).

DATED: July 23, 2015

STATE OF WASHINGTON
DEPARTMENT OF HEALTH
NURSING CARE QUALITY ASSURANCE
COMMISSION



PRESIDING OFFICER

PRESENTED BY:



TIMOTHY TALKINGTON, WSBA #41297
DEPARTMENT OF HEALTH STAFF ATTORNEY

July 22, 2015
DATE