



Certified True Copy

By [Signature]
Virginia Board of Nursing

COMMONWEALTH of VIRGINIA

David E. Brown, D.C.
Director

Department of Health Professions
Perimeter Center
9960 Mayland Drive, Suite 300
Henrico, Virginia 23233-1463

www.dhp.virginia.gov
TEL (804) 367-4400
FAX (804) 527-4475

November 1, 2016

Maureen Eghreriniovo, R.N.
4411 Deborah Court, Apt 4
Chesapeake, VA 23321

DUPLICATE COPY
VIA FIRST CLASS MAIL

DATE 11/1/16

29364 Castlewood Drive
Menifee, CA 92584

RE: License Number: 0001-249937
Case Number: 176472

DUPLICATE COPY
VIA FIRST CLASS MAIL

DATE 11/1/16

Dear Ms. Eghreriniovo:

Pursuant to Virginia Code § 54.1-2409, you are hereby given notice that your right to renew your license to practice professional nursing in the Commonwealth of Virginia has been mandatorily suspended by the enclosed Order entered October 31, 2016. You are hereby advised that you may not practice professional nursing or hold yourself out as a licensed professional nurse unless and until the Board of Nursing has notified you in writing that your license has been reinstated. Please return your license to Jay P. Douglas, Executive Director of the Virginia Board of Nursing ("Board"), at the above address, immediately upon receipt of this letter.

You may apply to the Board for reinstatement of your license, and you shall be entitled to a formal administrative hearing not later than the next regular meeting of the Board after the expiration of 60 days from the Board's receipt of your reinstatement application. The reinstatement of your license shall require the affirmative vote of three-fourths of the members of the Board present at the hearing. The reinstatement application can be found at www.dhp.virginia.gov/Nursing.

If you have any questions about this matter, you can contact me at (804) 367-4474 or anne.joseph@dhp.virginia.gov.

Sincerely,

[Signature: Anne Joseph]

Anne Joseph, Deputy Director
Administrative Proceedings Division

RECEIVED

NOV 01 2016

VA BD OF NURSING

cc: Jay P. Douglas, Executive Director, Board of Nursing

Enclosures

Board of Audiology & Speech-Language Pathology – Board of Counseling – Board of Dentistry – Board of Funeral Directors & Embalmers
Board of Long-Term Care Administrators – Board of Medicine – Board of Nursing – Board of Optometry – Board of Pharmacy
Board of Physical Therapy – Board of Psychology – Board of Social Work – Board of Veterinary Medicine
Board of Health Professions

BEFORE THE VIRGINIA DEPARTMENT OF HEALTH PROFESSIONS

IN RE: MAUREEN EGHRENERIOVO, R.N.
License Number: 0001-249937
Case Number: 176472

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 California Board of Registered Nursing revoked the license of Maureen Eghreriniovo, R.N., to practice professional nursing in the State of California. A certified copy of the Decision and Order is attached hereto as Commonwealth's Exhibit 1.

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 right of Maureen Eghreriniovo, R.N., to renew her license to practice professional nursing in the Commonwealth of Virginia is hereby SUSPENDED.

Upon entry of this Order, the license of Maureen Eghreriniovo, R.N., will be recorded as suspended. Should Maureen Eghreriniovo, 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 Maureen Eghreriniovo'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:

10/31/16

CERTIFICATION OF DUPLICATE RECORDS

I, David E. Brown, D.C., Director of the Department of Health Professions, hereby certify that the attached Decision and Order entered August 30, 2016, regarding Maureen Eghreriniovo, R.N., is a true copy of the records received from the California Board of Registered Nursing.



David E. Brown, D.C.

Date: 10/31/16



BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

Case No. 2016-924

MAUREEN NMACHUKWU EGHREERINIOVO
29364 Castlewood Drive
Menifee, CA 92584

Registered Nurse License No. 814988

Respondent.

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on September 29, 2016.

IT IS SO ORDERED August 30, 2016.

Michael D. Jackson, MSN, RN, BC-N

Michael D. Jackson, President
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

Joseph L. Morita

Joseph L. Morita, PhD, MSN, RN
Executive Officer



1 KAMALA D. HARRIS
Attorney General of California
2 ANTOINETTE B. CINCOTTA
Supervising Deputy Attorney General
3 KAREN L. GORDON
Deputy Attorney General
4 State Bar No. 137969
600 West Broadway, Suite 1800
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
Telephone: (619) 738-9427
7 Facsimile: (619) 645-2061
Attorneys for Complainant

8
9 **BEFORE THE**
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

12 MAUREEN NMACHUKWU
13 EGHREERINIOVO
29364 Castlewood Drive
14 Menifee, CA 92584

15 Registered Nurse License No. 814988

16 Respondent.

Case No. 2016-924

OAH No. 2016040832

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

17
18 In the interest of a prompt and speedy settlement of this matter, consistent with the public
19 interest and the responsibility of the Board of Registered Nursing of the Department of Consumer
20 Affairs (Board), the parties hereby agree to the following Stipulated Settlement and Disciplinary
21 Order which will be submitted to the Board for approval and adoption as the final disposition of
22 the Accusation.

23 **PARTIES**

24 1. Louise R. Bailey, M.Ed., RN was the Executive Officer of the Board. She brought
25 this action solely in her official capacity. This matter is currently brought by Joseph L. Morris,
26 PhD, MSN, RN (Complainant) solely in his official capacity as the Executive Officer of the
27 Board and is represented in this matter by Kamala D. Harris, Attorney General of the State of
28 California, by Karen L. Gordon, Deputy Attorney General.

1 2. Respondent Maureen Nmachukwu Eghreriniovo (Respondent) is represented in this
2 proceeding by attorney John D. Bishop, whose address is: 5000 Birch Street, Suite 7000,
3 Newport Beach, CA 92660-2127,

4 3. On or about February 27, 2012, the Board issued Registered Nurse License No.
5 814988 to Maureen Nmachukwu Eghreriniovo (Respondent). The Registered Nurse License was
6 in full force and effect at all times relevant to the charges brought in Accusation No. 2016-924,
7 and will expire on December 31, 2017, unless renewed.

8 JURISDICTION

9 4. Accusation No. 2016-924 was filed before the Board, and is currently pending against
10 Respondent. The Accusation and all other statutorily required documents were properly served
11 on Respondent on March 18, 2016. Respondent timely filed her Notice of Defense contesting the
12 Accusation.

13 5. A copy of Accusation No. 2016-924 is attached as Exhibit A and incorporated herein
14 by reference.

15 ADVISEMENT AND WAIVERS

16 6. Respondent has carefully read, fully discussed with counsel, and understands the
17 charges and allegations in Accusation No. 2016-924. Respondent has also carefully read, fully
18 discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary
19 Order.

20 5. Respondent is fully aware of her legal rights in this matter, including the right to a
21 hearing on the charges and allegations in the Accusation; the right to confront and cross-examine
22 the witnesses against her; the right to present evidence and to testify on her own behalf; the right
23 to the issuance of subpoenas to compel the attendance of witnesses and the production of
24 documents; the right to reconsideration and court review of an adverse decision; and all other
25 rights accorded by the California Administrative Procedure Act and other applicable laws.

26 6. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
27 every right set forth above.

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1 CULPABILITY

2 7. Respondent admits the truth of each and every charge and allegation in Accusation
3 No. 2016-924.

4 8. Respondent agrees that her Registered Nurse License is subject to discipline and she
5 agrees to be bound by the Board's probationary terms as set forth in the Disciplinary Order below.

6 CONTINGENCY

7 9. This stipulation shall be subject to approval by the Board. Respondent understands
8 and agrees that counsel for Complainant and the staff of the Board may communicate directly
9 with the Board regarding this stipulation and settlement, without notice to or participation by
10 Respondent or her counsel. By signing the stipulation, Respondent understands and agrees that
11 she may not withdraw her agreement or seek to rescind the stipulation prior to the time the Board
12 considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order,
13 the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this
14 paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not
15 be disqualified from further action by having considered this matter.

16 10. The parties understand and agree that Portable Document Format (PDF) and facsimile
17 copies of this Stipulated Settlement and Disciplinary Order, including PDF and facsimile
18 signatures thereto, shall have the same force and effect as the originals.

19 11. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an
20 integrated writing representing the complete, final, and exclusive embodiment of their agreement.
21 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
22 negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary
23 Order may not be altered, amended, modified, supplemented, or otherwise changed except by a
24 writing executed by an authorized representative of each of the parties.

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

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DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Registered Nurse License No. 814988 issued to Respondent Maureen Nmachukwu Eghreriniovo is revoked. However, the revocation is stayed and Respondent is placed on probation for three (3) years on the following conditions.

IT IS FURTHER ORDERED that any new certification(s) issued while Respondent remains on probation shall also be placed on probation subject to the same terms and conditions applicable to Respondent's registered nurse license.

Severability Clause. Each condition of probation contained herein is a separate and distinct condition. If any condition of this Order, or any application thereof, is declared unenforceable in whole, in part, or to any extent, the remainder of this Order, and all other applications thereof, shall not be affected. Each condition of this Order shall separately be valid and enforceable to the fullest extent permitted by law.

1. **Obey All Laws.** Respondent shall obey all federal, state and local laws. A full and detailed account of any and all violations of law shall be reported by Respondent to the Board in writing within seventy-two (72) hours of occurrence. To permit monitoring of compliance with this condition, Respondent shall submit completed fingerprint forms and fingerprint fees within 45 days of the effective date of the decision, unless previously submitted as part of the licensure application process.

Criminal Court Orders: If Respondent is under criminal court orders, including probation or parole, and the order is violated, this shall be deemed a violation of these probation conditions, and may result in the filing of an accusation and/or petition to revoke probation.

2. **Comply with the Board's Probation Program.** Respondent shall fully comply with the conditions of the Probation Program established by the Board, and, cooperate with representatives of the Board in its monitoring and investigation of the Respondent's compliance with the Board's Probation Program. Respondent shall inform the Board in writing within no more than 15 days of any address change and shall at all times maintain an active, current license status with the Board, including during any period of suspension.

Upon successful completion of probation, Respondent's license shall be fully restored.

1 3. **Report in Person.** Respondent, during the period of probation, shall appear in
2 person at interviews/meetings as directed by the Board or its designated representatives.

3 4. **Residency, Practice, or Licensure Outside of State:** Periods of residency or
4 practice as a registered nurse outside of California shall not apply toward a reduction of this
5 probation time period. Respondent's probation is tolled, if and when she resides outside of
6 California. Respondent must provide written notice to the Board within 15 days of any change of
7 residency or practice outside the state, and within 30 days prior to re-establishing residency or
8 returning to practice in this state.

9 Respondent shall provide a list of all states and territories where she has ever been licensed
10 as a registered nurse, vocational nurse, or practical nurse. Respondent shall further provide
11 information regarding the status of each license and any changes in such license status during the
12 term of probation. Respondent shall inform the Board if she applies for or obtains a new nursing
13 license during the term of probation.

14 5. **Submit Written Reports.** Respondent, during the period of probation, shall submit
15 or cause to be submitted such written reports/declarations and verification of actions under
16 penalty of perjury, as required by the Board. These reports/declarations shall contain statements
17 relative to Respondent's compliance with all the conditions of the Board's Probation Program.
18 Respondent shall immediately execute all release of information forms as may be required by the
19 Board or its representatives.

20 Respondent shall provide a copy of this Decision to the nursing regulatory agency in every
21 state and territory in which she has a registered nurse license.

22 6. **Function as a Registered Nurse.** Respondent, during the period of probation, shall
23 engage in the practice of registered nursing in California for a minimum of 24 hours per week for
24 6 consecutive months or as determined by the Board.

25 For purposes of compliance with the section, "engage in the practice of registered nursing"
26 may include, when approved by the Board, volunteer work as a registered nurse, or work in any
27 non-direct patient care position that requires licensure as a registered nurse.

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1 The Board may require that advanced practice nurses engage in advanced practice nursing
2 for a minimum of 24 hours per week for 6 consecutive months or as determined by the Board.

3 If Respondent has not complied with this condition during the probationary term, and
4 Respondent has presented sufficient documentation of her good faith efforts to comply with this
5 condition, and if no other conditions have been violated, the Board, in its discretion, may grant an
6 extension of Respondent's probation period up to one year without further hearing in order to
7 comply with this condition. During the one year extension, all original conditions of probation
8 shall apply.

9 **7. Employment Approval and Reporting Requirements.** Respondent shall obtain
10 prior approval from the Board before commencing or continuing any employment, paid or
11 voluntary, as a registered nurse. Respondent shall cause to be submitted to the Board all
12 performance evaluations and other employment related reports as a registered nurse upon request
13 of the Board.

14 Respondent shall provide a copy of this Decision to her employer and immediate
15 supervisors prior to commencement of any nursing or other health care related employment.

16 In addition to the above, Respondent shall notify the Board in writing within seventy-two
17 (72) hours after she obtains any nursing or other health care related employment. Respondent
18 shall notify the Board in writing within seventy-two (72) hours after she is terminated or
19 separated, regardless of cause, from any nursing, or other health care related employment with a
20 full explanation of the circumstances surrounding the termination or separation.

21 **8. Supervision.** Respondent shall obtain prior approval from the Board regarding
22 Respondent's level of supervision and/or collaboration before commencing or continuing any
23 employment as a registered nurse, or education and training that includes patient care.

24 Respondent shall practice only under the direct supervision of a registered nurse in good
25 standing (no current discipline) with the Board, unless alternative methods of supervision and/or
26 collaboration (e.g., with an advanced practice nurse or physician) are approved.

27 Respondent's level of supervision and/or collaboration may include, but is not limited to the
28 following:

1 (a) Maximum - The individual providing supervision and/or collaboration is present in
2 the patient care area or in any other work setting at all times.

3 (b) Moderate - The individual providing supervision and/or collaboration is in the patient
4 care unit or in any other work setting at least half the hours Respondent works.

5 (c) Minimum - The individual providing supervision and/or collaboration has person-to-
6 person communication with Respondent at least twice during each shift worked.

7 (d) Home Health Care - If Respondent is approved to work in the home health care
8 setting, the individual providing supervision and/or collaboration shall have person-to-person
9 communication with Respondent as required by the Board each work day. Respondent shall
10 maintain telephone or other telecommunication contact with the individual providing supervision
11 and/or collaboration as required by the Board during each work day. The individual providing
12 supervision and/or collaboration shall conduct, as required by the Board, periodic, on-site visits to
13 patients' homes visited by Respondent with or without Respondent present.

14 9. **Employment Limitations.** Respondent shall not work for a nurse's registry, in any
15 private duty position as a registered nurse, a temporary nurse placement agency, a traveling nurse,
16 or for an in-house nursing pool.

17 Respondent shall not work for a licensed home health agency as a visiting nurse unless the
18 registered nursing supervision and other protections for home visits have been approved by the
19 Board. Respondent shall not work in any other registered nursing occupation where home visits
20 are required.

21 Respondent shall not work in any health care setting as a supervisor of registered nurses.
22 The Board may additionally restrict Respondent from supervising licensed vocational nurses
23 and/or unlicensed assistive personnel on a case-by-case basis.

24 Respondent shall not work as a faculty member in an approved school of nursing or as an
25 instructor in a Board approved continuing education program.

26 Respondent shall work only on a regularly assigned, identified and predetermined
27 worksite(s) and shall not work in a float capacity.

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1 If Respondent is working or intends to work in excess of 40 hours per week, the Board may
2 request documentation to determine whether there should be restrictions on the hours of work.

3 **10. Complete a Nursing Course(s).** Respondent, at her own expense, shall enroll in
4 and successfully complete a course(s) relevant to the practice of registered nursing no later than
5 six months prior to the end of her probationary term.

6 Respondent shall obtain prior approval from the Board before enrolling in the course(s).
7 Respondent shall submit to the Board the original transcripts or certificates of completion for the
8 above required course(s). The Board shall return the original documents to Respondent after
9 photocopying them for its records.

10 **11. Cost Recovery.** Respondent shall pay to the Board costs associated with its
11 investigation and enforcement pursuant to Business and Professions Code section 125.3 in the
12 amount of \$3,620.00. Respondent shall be permitted to pay these costs in a payment plan
13 approved by the Board, with payments to be completed no later than three months prior to the end
14 of the probation term.

15 If Respondent has not complied with this condition during the probationary term, and
16 Respondent has presented sufficient documentation of her good faith efforts to comply with this
17 condition, and if no other conditions have been violated, the Board, in its discretion, may grant an
18 extension of Respondent's probation period up to one year without further hearing in order to
19 comply with this condition. During the one year extension, all original conditions of probation
20 will apply.

21 **12. Violation of Probation.** If Respondent violates the conditions of her probation, the
22 Board after giving Respondent notice and an opportunity to be heard, may set aside the stay order
23 and impose the stayed discipline (revocation/suspension) of Respondent's license.

24 If during the period of probation, an accusation or petition to revoke probation has been
25 filed against Respondent's license or the Attorney General's Office has been requested to prepare
26 an accusation or petition to revoke probation against Respondent's license, the probationary
27 period shall automatically be extended and shall not expire until the accusation or petition has
28 been acted upon by the Board.

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APPROVAL

I have read and fully discussed with Respondent Maureen Nmachukwu Eghereriniovo the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

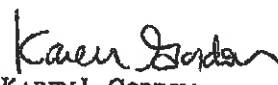
DATED: 8-9-16 
JOHN D. BISHOP
Attorney for Respondent

ENDORSEMENT

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

Dated: 8-9-16

Respectfully submitted,
KAMALA D. HARRIS
Attorney General of California
ANTOINETTE B. CINCOTTA
Supervising Deputy Attorney General


KAREN L. GORDON
Deputy Attorney General
Attorneys for Complainant

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81423497.doc

Exhibit A

Accusation No. 2016-924

1 KAMALA D. HARRIS
Attorney General of California
2 GREGORY J. SALUTE
Supervising Deputy Attorney General
3 KAREN L. GORDON
Deputy Attorney General
4 State Bar No. 137969
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5 San Diego, CA 92101
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6 San Diego, CA 92186-5266
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7 Facsimile: (619) 645-2061
Attorneys for Complainant
8

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

12 In the Matter of the Accusation Against:

Case No. *206 924*

13 **MAUREEN NMACHUKWU EGHRENERIOVO**
29364 Castlewood Drive
14 Menifee, CA 92584

ACCUSATION

15 **Registered Nurse License No. 814988**

16 Respondent.
17

18 Complainant alleges:

19 **PARTIES**

20 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
21 official capacity as the Executive Officer of the Board of Registered Nursing (Board),
22 Department of Consumer Affairs.

23 2. On or about February 27, 2012, the Board issued Registered Nurse License Number
24 814988 to Maureen Nmachukwu Eghreriniovo (Respondent). The Registered Nurse License was
25 in full force and effect at all times relevant to the charges brought herein and will expire on
26 December 31, 2017, unless renewed.

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1 **JURISDICTION**

2 3. This Accusation is brought before the Board, under the authority of the following
3 laws. All section references are to the Business and Professions Code (Code) unless otherwise
4 indicated.

5 4. Section 2750 of the Code provides, in pertinent part, that the Board may discipline
6 any licensee, including a licensee holding a temporary or an inactive license, for any reason
7 provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

8 5. Section 2764 of the Code provides, in pertinent part, that the expiration of a license
9 shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the
10 licensee or to render a decision imposing discipline on the license.

11 **STATUTORY PROVISIONS**

12 6. Section 482 of the Code states:

13 Each board under the provisions of this code shall develop criteria to evaluate
14 the rehabilitation of a person when:

- 15 (a) Considering the denial of a license by the board under Section 480; or
16 (b) Considering suspension or revocation of a license under Section 490.

17 Each board shall take into account all competent evidence of rehabilitation
furnished by the applicant or licensee.

18 7. Section 493 of the Code states:

19 Notwithstanding any other provision of law, in a proceeding conducted by a
20 board within the department pursuant to law to deny an application for a license or to
21 suspend or revoke a license or otherwise take disciplinary action against a person who
22 holds a license, upon the ground that the applicant or the licensee has been convicted
23 of a crime substantially related to the qualifications, functions, and duties of the
24 licensee in question, the record of conviction of the crime shall be conclusive
evidence of the fact that the conviction occurred, but only of that fact, and the board
may inquire into the circumstances surrounding the commission of the crime in order
to fix the degree of discipline or to determine if the conviction is substantially related
to the qualifications, functions, and duties of the licensee in question.

25 As used in this section, "license" includes "certificate," "permit," "authority,"
and "registration."

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1 8. Section 2761 of the Code states:

2 The board may take disciplinary action against a certified or licensed nurse or
3 deny an application for a certificate or license for any of the following:

4 (a) Unprofessional conduct, which includes, but is not limited to, the following:

5 (f) Conviction of a felony or of any offense substantially related to the qualifications,
6 functions, and duties of a registered nurse, in which event the record of the conviction shall
7 be conclusive evidence thereof

8 9. Section 2765 of the Code states:

9 A plea or verdict of guilty or a conviction following a plea of nolo contendere
10 made to a charge substantially related to the qualifications, functions and duties of a
11 registered nurse is deemed to be a conviction within the meaning of this article. The
12 board may order the license or certificate suspended or revoked, or may decline to
13 issue a license or certificate, when the time for appeal has elapsed, or the judgment of
14 conviction has been affirmed on appeal or when an order granting probation is made
15 suspending the imposition of sentence, irrespective of a subsequent order under the
16 provisions of Section 1203.4 of the Penal Code allowing such person to withdraw his
17 or her plea of guilty and to enter a plea of not guilty, or setting aside the verdict of
18 guilty, or dismissing the accusation, information or indictment.

15 REGULATORY PROVISIONS

16 10. California Code of Regulations, title 16, section 1444, states:

17 A conviction or act shall be considered to be substantially related to the
18 qualifications, functions or duties of a registered nurse if to a substantial degree it
19 evidences the present or potential unfitness of a registered nurse to practice in a
20 manner consistent with the public health, safety, or welfare. Such convictions or acts
21 shall include but not be limited to the following:

22 (a) Assaultive or abusive conduct including, but not limited to, those
23 violations listed in subdivision (d) of Penal Code Section 11160.

24 (b) Failure to comply with any mandatory reporting requirements.

25 (c) Theft, dishonesty, fraud, or deceit.

26 (d) Any conviction or act subject to an order of registration pursuant to
27 Section 290 of the Penal Code.

28 11. California Code of Regulations, title 16, section 1445(b) states:

When considering the suspension or revocation of a license on the grounds
that a registered nurse has been convicted of a crime, the board, in evaluating the
rehabilitation of such person and his/her eligibility for a license will consider the
following criteria:

1 (1) Nature and severity of the act(s) or offense(s).

2 (2) Total criminal record.

3 (3) The time that has elapsed since commission of the act(s) or offense(s).

4 (4) Whether the licensee has complied with any terms of parole, probation,
5 restitution or any other sanctions lawfully imposed against the licensee.

6 (5) If applicable, evidence of expungement proceedings pursuant to Section
7 1203.4 of the Penal Code.

8 (6) Evidence, if any, of rehabilitation submitted by the licensee.

9 COSTS

10 12. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
11 administrative law judge to direct a licentiate found to have committed a violation or violations of
12 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
13 enforcement of the case, with failure of the licentiate to comply subjecting the license to not being
14 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
15 included in a stipulated settlement.

16 FIRST CAUSE FOR DISCIPLINE

17 (January 22, 2015 Criminal Conviction for Grand Theft)

18 13. Respondent has subjected her license to disciplinary action under sections 2761(a)
19 and (f) of the Code in that she was convicted of a crime that is substantially related to the
20 qualifications, functions, and duties of a registered nurse. The circumstances are as follows:

21 a. On or about January 22, 2015, in a criminal proceeding entitled *The People of*
22 *the State of California v. Maureen Nmachukwu Anwuli, aka Maureen Eghreriniovo*, in Riverside
23 County Superior Court, case number SWF 1301463, Respondent was convicted on her plea of
24 guilty to violating Penal Code section 487(a), (grand theft), a misdemeanor. The court dismissed
25 the charge of violating Penal Code Section 182(a)(4), (conspiracy to cheat and defraud), in the
26 interest of the justice.

27 b. As a result of the conviction, Respondent was granted summary probation for
28 one year, be committed to the custody of the Riverside County Sheriff for two days with credit

1 for two days served. Respondent was further ordered to pay fees and fines, and restitution in the
2 amount of \$9,000.00 and comply with the terms of probation.

3 c. The facts that led to the conviction are that:

4 1) In or about January, 2008 and November, 2009, Respondent asked staff at
5 Vine Care Center to forge the names of patients on sign-in sheets to be submitted to the
6 County of Riverside for payment on State Medi-Cal Program for services they did not
7 perform.

8 2) In or about March, 2009, Respondent forged the names of Vine Care Center
9 patients on sign-in sheets that she prepared so the sign-in sheets could be submitted to the
10 County of Riverside for payment on State Medi-Cal Program for services they did not
11 perform.

12 DISCIPLINE CONSIDERATIONS

13 14. To determine the degree of discipline, if any, to be imposed on Respondent,
14 Complainant alleges that on or about April 2, 2009, in a criminal proceeding entitled *State of*
15 *California v. Maureen N. Anwuli*, in Riverside County Superior Court, case number 00101MA,
16 Respondent was convicted on her plea of guilty to violating Vehicle Code section 12500(a),
17 (unlicensed driver). Respondent was ordered to pay a fine in the amount of \$441.00.

18 PRAYER

19 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
20 and that following the hearing, the Board of Registered Nursing issue a decision:

21 1. Revoking or suspending Registered Nurse License Number 814988, issued to
22 Maureen Nmachukwu Eghreriniovo;

23 2. Ordering Maureen Nmachukwu Eghreriniovo to pay the Board of Registered Nursing
24 the reasonable costs of the investigation and enforcement of this case, pursuant to Business and
25 Professions Code section 125.3;

26 ///

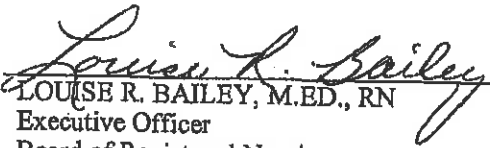
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3. Taking such other and further action as deemed necessary and proper.

DATED: March 18, 2016


LOUISE R. BAILEY, M.ED., RN
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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