

VIRGINIA:

BEFORE THE BOARD OF NURSING

IN RE:       CRISTINA OLIVIA TAYLOR, R.N.  
              License No.: 0001-243663

CONSENT ORDER

The Virginia Board of Nursing ("The Board") and Cristina Olivia Taylor, R. N., as evidenced by their signatures affixed below, agree to enter into this Consent Order affecting the license of Ms. Taylor to practice nursing in the Commonwealth of Virginia.

FINDINGS OF FACT

The Board adopts the following findings of fact in this matter:

1.       Cristina Olivia Taylor, R.N., was issued license number 0001-243663 by the Board to practice nursing in the Commonwealth of Virginia on March 25, 2013. Said license is scheduled to expire on October 31, 2017. Ms. Taylor also holds License No. 841440 to practice nursing in the State of California. Her primary state of residence is Virginia.
2.       By Order entered August 6, 2015, the Virginia Board of Nursing reprimanded Ms. Taylor's license to practice nursing. This action was based on Ms. Taylor's violation of § 54.1-3007 (2) and (5) of the Code of Virginia (1950), as amended ("Code") and 18 VAC 90-20-300(A)(2)(c) of the Regulations Governing the Practice of Nursing, in that, on July 11, 2015, during the course of her employment with Glenburnie Rehabilitation and Nursing Center, Richmond, Virginia, Ms. Taylor took one tablet of Zofran (ondansetron) 4mg from a patient's supply and gave it to another nurse for her personal and unauthorized use.
3.       By Decision and Order effective on November 5, 2015, the State of California Board of Registered Nursing accepted the voluntary surrender, in lieu of further

disciplinary action of the license of Cristina Olivia Taylor, R.N., to practice nursing in the State of California. This action was based solely on the Virginia Board's Order entered August 6, 2015.

4. By Order entered July 19, 2016, the Director of the Department of Health Professions mandatorily suspended Ms. Taylor's license pursuant to Section 54.1-2409 of the Code due to the action of the California Board.

#### CONCLUSIONS OF LAW

This matter of the reinstatement of Ms. Taylor's license to practice nursing in the Commonwealth of Virginia is properly before the Board.

#### CONSENT

I, Cristina Olivia Taylor, R.N., by affixing my signature hereto, acknowledge that:

1. I have been advised specifically to seek the 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, except pursuant to the Virginia Administrative Process Act, § 2.2-4000.A et seq. of the Code of Virginia;
3. I have the following rights, among others:
  - a. the right to an informal conference before the Board; and
  - b. the right to appear in person or by counsel.
4. I waive all rights to an informal conference;
5. I admit the truth of the above Findings of Fact; and
6. I consent to the following Order affecting my license to practice nursing in the

Commonwealth of Virginia.

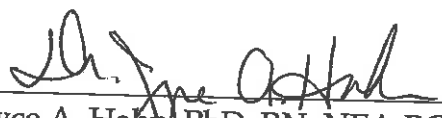
ORDER

WHEREFORE, based on the foregoing Findings of Fact and Conclusions of Law, and with the consent of the licensee, it is hereby ORDERED that the license of Cristina Olivia Taylor, R.N., to practice nursing in the Commonwealth of Virginia, be, and hereby is, REINSTATED effective July 19, 2016.

Ms. Taylor shall maintain a course of conduct in her practice of nursing commensurate with the requirements of Title 54.1, Chapter 29 of the Code and all laws of the Commonwealth.

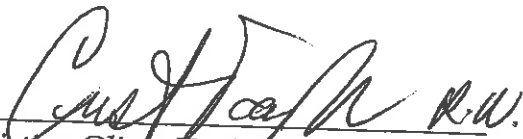
Pursuant to Section 54.1-2400.2 of the Code, the signed original of this Consent Order shall remain in the custody of the Department of Health Professions as a public record and shall be made available for public inspection and copying upon request.

FOR THE BOARD:

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

ENTERED: 7/19/16

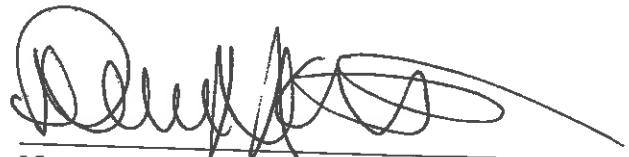
SEEN AND AGREED TO:

  
Cristina Olivia Taylor, R.N.

COMMONWEALTH OF VIRGINIA  
COUNTY/CITY OF Henrico, TO WIT:

Subscribed and sworn to before me, the undersigned Notary Public, in and for the Commonwealth of Virginia, at large, this 24<sup>th</sup> day of July, 2016, by Cristina Olivia Taylor, R.N.



  
Notary Public

Registration Number: 71023131

My commission expires: 10/31/2018

Certified True Copy

By dgraham  
Virginia Board Of Nursing

VIRGINIA:

BEFORE THE DEPARTMENT OF HEALTH PROFESSIONS


IN RE: **CRISTINA OLIVIA TAYLOR, R.N.**  
License No.: 0001-243663

ORDER

In accordance with Section 54.1-2409 of the Code of Virginia (1950), as amended, ("Code"), I, David E. Brown, D.C., Director of the Virginia Department of Health Professions, received and acted upon evidence that the State of California Board of Registered Nursing accepted the voluntary surrender, in lieu in further disciplinary action, from Cristina Olivia Taylor, R.N., of her license to practice nursing in the State of California by a Decision and Order effective November 5, 2015. A certified copy of the Decision and Order is attached to this Order and is marked as Commonwealth's Exhibit No. 1.

WHEREFORE, by the authority vested in the Director of the Department of Health Professions pursuant to Section 54.1-2409 of the Code, it is hereby ORDERED that the license of Cristina Olivia Taylor, R.N., to practice nursing in the Commonwealth of Virginia be, and hereby is, SUSPENDED.

Pursuant to Sections 2.2-4023 and 54.1-2400.2 of the Code, 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.

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

ENTERED AND MAILED ON:

7/19/16

Certified True Copy  
By   
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

### 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 effective on November 5, 2015, regarding Cristina Olivia Taylor, R.N., are true copies of the records received from the California State Board of Registered Nursing.

\_\_\_\_\_  
David E. Brown, D.C.

Date: 7/19/16

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



BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

CRISTINA OLIVIA TAYLOR a.k.a.,  
OLIVIA MATUS

Registered Nurse License No. 841440

Case No. 2016-327

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 November 5, 2015.

IT IS SO ORDERED this 5<sup>th</sup> day of November 2015.

*Louise R. Bailey*  
for Louise R. Bailey, M.Ed., RN  
Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California



1 KAMALA D. HARRIS  
Attorney General of California  
2 JAMES M. LEDAKIS  
Supervising Deputy Attorney General  
3 RITA M. LANE  
Deputy Attorney General  
4 State Bar No. 171352  
600 West Broadway, Suite 1800  
5 San Diego, CA 92101  
P.O. Box 85266  
6 San Diego, CA 92186-5266  
Telephone: (619) 645-2614  
7 Facsimile: (619) 645-2061  
*Attorneys for Complainant*

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

11 In the Matter of the Accusation Against:

12 **CRISTINA OLIVIA TAYLOR; AKA**  
13 **OLIVIA MATUS**  
14 **7322 Hardtack Road**  
**Mechanicsville, VA 23116**

15 **Registered Nurse License No. 841440**

16 Respondent.

Case No. 2016-327

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

17  
18 **IT IS HEREBY STIPULATED AND AGREED** by and between the parties to the above-  
19 entitled proceedings that the following matters are true:

20 **PARTIES**

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

25 2. Cristina Olivia Taylor; aka Olivia Matus (Respondent) is representing herself in this  
26 proceeding and has chosen not to exercise her right to be represented by counsel.

27 3. On or about April 19, 2013, the Board of Registered Nursing (Board) issued  
28 Registered Nurse License No. 841440 to Respondent. The Registered Nurse License was in full



1 force and effect at all times relevant to the charges brought in Accusation No. 2016-327 and will  
2 expire on November 30, 2016, unless renewed.

3 JURISDICTION

4 4. Accusation No. 2016-327 was filed before the Board and is currently pending against  
5 Respondent. The Accusation and all other statutorily required documents were properly served  
6 on Respondent on September 23, 2015. Respondent timely filed her Notice of Defense contesting  
7 the Accusation. A copy of Accusation No. 2016-327 is attached as Exhibit A and incorporated by  
8 reference.

9 ADVISEMENT AND WAIVERS

10 5. Respondent has carefully read, and understands the charges and allegations in  
11 Accusation No. 2016-327. Respondent also has carefully read, and understands the effects of this  
12 Stipulated Surrender of License and Order.

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

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

22 CULPABILITY

23 8. Respondent admits the truth of each and every charge and allegation in Accusation  
24 No. 2016-327, agrees that cause exists for discipline and hereby surrenders her Registered Nurse  
25 License No. 841440 for the Board's formal acceptance.

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

28 ///

CONTINGENCY

10. 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 Surrender and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

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

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

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

ORDER

IT IS HEREBY ORDERED that Registered Nurse License No. 841440, issued to Respondent Cristina Olivia Taylor; aka Olivia Matus, is surrendered and accepted by the Board of Registered Nursing.

1. The surrender of Respondent's Registered Nurse License and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against Respondent.

1 This stipulation constitutes a record of the discipline and shall become a part of Respondent's  
2 license history with the Board of Registered Nursing.

3 2. Respondent shall lose all rights and privileges as a Registered Nurse in California as  
4 of the effective date of the Board's Decision and Order.

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

7 4. If Respondent ever files an application for licensure or a petition for reinstatement in  
8 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must  
9 comply with all the laws, regulations and procedures for reinstatement of a revoked license in  
10 effect at the time the petition is filed, and all of the charges and allegations contained in  
11 Accusation No. 2016-327 shall be deemed to be true, correct and admitted by Respondent when  
12 the Board determines whether to grant or deny the petition.

13 5. If and when Respondent's license is reinstated, she shall pay to the Board costs  
14 associated with its investigation and enforcement pursuant to Business and Professions Code  
15 section 125.3 in the amount of \$485.00. Respondent shall be permitted to pay these costs in a  
16 payment plan approved by the Board. Nothing in this provision shall be construed to prohibit the  
17 Board from reducing the amount of cost recovery upon reinstatement of the license.

18 6. If Respondent should ever apply or reapply for a new license or certification, or  
19 petition for reinstatement of a license, by any other health care licensing agency in the State of  
20 California, all of the charges and allegations contained in Accusation No. 2016-327 shall be  
21 deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of  
22 Issues or any other proceeding seeking to deny or restrict licensure.

23 7. Respondent shall not apply for licensure or petition for reinstatement for two (2)  
24 years from the effective date of the Board of Registered Nursing's Decision and Order.

25 ACCEPTANCE

26 I have carefully read the Stipulated Surrender of License and Order. I understand the  
27 stipulation and the effect it will have on my Registered Nurse License. I enter into this Stipulated

28 ///

1 Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound  
2 by the Decision and Order of the Board of Registered Nursing.

3  
4 DATED: 10/23/2015

  
5 CRISTINA OLIVIA TAYLOR; AKA OLIVIA  
6 MATUS  
7 Respondent

8 ENDORSEMENT

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

11 DATED: 10/23/2015

12 Respectfully submitted,  
13 KAMALA D. HARRIS  
14 Attorney General of California  
15 JAMES M. LEDAKIS  
16 Supervising Deputy Attorney General



17 RITA M. LANE  
18 Deputy Attorney General  
19 Attorneys for Complainant

20 SD2015802413  
21 81169484.doc

**Exhibit A**

**Accusation No. 2016-327**

1 KAMALA D. HARRIS  
Attorney General of California  
2 JAMES M. LEDAKIS  
Supervising Deputy Attorney General  
3 NICOLE R. TRAMA  
Deputy Attorney General  
4 State Bar No. 263607  
600 West Broadway, Suite 1800  
5 San Diego, CA 92101  
P.O. Box 85266  
6 San Diego, CA 92186-5266  
Telephone: (619) 645-2143  
7 Facsimile: (619) 645-2061  
*Attorneys for Complainant*

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

11 In the Matter of the Accusation Against:  
12  
13 **CRISTINA OLIVIA TAYLOR;**  
**AKA OLIVIA MATUS**  
14 **7322 Hardtack Road**  
**Mechanicsville, VA 23116**  
15 **Registered Nurse License No. 841440**  
16 Respondent.

Case No. 2016-327

**A C C U S A T I O N**

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, Department of  
22 Consumer Affairs.
- 23 2. On or about April 19, 2013, the Board of Registered Nursing issued Registered Nurse  
24 License Number 841440 to Cristina Olivia Taylor; aka Olivia Matus (Respondent). The  
25 Registered Nurse License was in full force and effect at all times relevant to the charges brought  
26 herein and will expire on November 30, 2016, unless renewed.

1 **JURISDICTION**

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

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

9 **STATUTORY PROVISIONS**

10 5. Code section 2764 provides, in pertinent part, that the expiration of a license shall not  
11 deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or  
12 to render a decision imposing discipline on the license. Under Code section 2811, subdivision  
13 (b), the Board may renew an expired license at any time within eight years after the expiration.

14 6. Code section 2761 states, in pertinent part:

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

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

19 (4) Denial of licensure, revocation, suspension, restriction, or any other  
20 disciplinary action against a health care professional license or certificate by another  
21 state or territory of the United States, by any other government agency, or by another  
22 California health care professional licensing board. A certified copy of the decision  
or judgment shall be conclusive evidence of that action....

23 **COST RECOVERY**

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

1 CAUSE FOR DISCIPLINE

2 (Disciplinary Action by the Virginia State Board of Nursing)

3 8. Respondent is subject to discipline pursuant to Code section 2761, subdivision (a)(4),  
4 on the grounds of unprofessional conduct, in that her Virginia Nursing License was disciplined by  
5 the Virginia Board of Nursing ("Virginia Board"), as follows:

6 9. On or about August 6, 2015, pursuant to the Consent Order in the action entitled: *In*  
7 *Re: Christina Taylor, RN, License No.: 0001-243663, Before the Board of Nursing*, the Virginia  
8 Board entered order wherein Respondent's Virginia Nursing License was reprimanded.

9 10. The facts that led to the discipline are as follows: On or about July 11, 2015, during  
10 the course of her employment with Glenburnie Rehabilitation and Nursing Center, in Richmond,  
11 Virginia, Respondent took one tablet of Zofran (Ondansetron) 4 mg from a patient's supply and  
12 gave it to another nurse for her personal and unauthorized use. Respondent's employment was  
13 suspended for four days as a result of the incident.

14 **PRAYER**


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

17 1. Revoking or suspending Registered Nurse License Number 841440, issued to Cristina  
18 Olivia Taylor; aka Olivia Matus;

19 2. Ordering Cristina Olivia Taylor to pay the Board of Registered Nursing the  
20 reasonable costs of the investigation and enforcement of this case, pursuant to Business and  
21 Professions Code section 125.3;

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

23  
24 DATED: September 23, 2015

25 *for*   
26 LOUISE R. BAILEY, M.ED., RN  
27 Executive Officer  
28 Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
*Complainant*

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