

**BEFORE THE VIRGINIA BOARD OF NURSING**

**IN RE: BROOKE E. TRENT, R.N. REINSTATEMENT APPLICANT**  
**License Number: 0001-232084**  
**Suspension Date: June 3, 2016**  
**Case Number: 174656**

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**NOTICE OF FORMAL ADMINISTRATIVE HEARING  
AND STATEMENT OF ALLEGATIONS**

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**You are hereby notified that a formal hearing has been scheduled before the Board of Nursing (“Board”) regarding your application for reinstatement of your license to practice professional nursing in the Commonwealth of Virginia following its mandatory suspension by the Department of Health Professions.**

<b>TYPE OF PROCEEDING:</b>	This is a formal administrative hearing before a panel of the Board of Nursing.
<b>DATE AND TIME:</b>	<b>September 21, 2016 1:00 P.M.</b>
<b>PLACE:</b>	Virginia Department of Health Professions Perimeter Center - 9960 Mayland Drive 2 <sup>nd</sup> Floor - Virginia Conference Center Henrico, Virginia 23233

**LEGAL AUTHORITY AND JURISDICTION:**

1. This formal hearing is being held pursuant to Virginia Code §§ 2.2-4020, 2.2-4024(F), and 54.1-2400(11). This proceeding will be convened as a public meeting pursuant to Virginia Code § 2.2-3700.

2. The burden rests on you, as the applicant, to demonstrate that you are prepared to resume the safe and competent practice of professional nursing.

3. In considering your application, the Board will consider evidence that grounds may exist to deny your application for reinstatement of your license to practice professional nursing, as more fully set out in the enclosed Statement of Allegations.

4. At the conclusion of the proceeding, the Board is authorized to take any of the following actions:

- Approve your application and issue an unrestricted license to practice professional nursing;
- Approve your application and issue a restricted license subject to terms and conditions;

- Deny your application;
- Deny your application and continue your license on indefinite suspension or revoke your license.

**ABSENCE OF RESPONDENT AND RESPONDENT'S COUNSEL:**

If you fail to appear at the formal hearing, the Board may proceed to hear this matter in your absence and may take any of the actions outlined above.

**RESPONDENT'S LEGAL RIGHTS:**

You have the right to the information on which the Board will rely in making its decision, to be represented by counsel at this proceeding, to subpoena witnesses and/or documents, and to present relevant evidence on your behalf.

**COMMONWEALTH'S EXHIBIT:**

Enclosed is a copy of the documents that will be distributed to the members of the Board and will be considered by the Board when discussing any allegations with you and when deliberating on your case. **These documents are enclosed only with the notice sent by certified mail, which you may be required to claim at the post office. Please bring these documents with you to the formal hearing.**

**FILING DEADLINES:**

1. Deadline for filing exhibits: September 9, 2016. Submit 15 copies of all documents you want the Board to consider to Darlene Graham, Board of Nursing, 9960 Mayland Drive, Suite 300, Henrico, Virginia 23233. Exhibits may not be sent by facsimile or e-mail.
2. Deadline for filing motions, including requests for continuance or objections to exhibits, in writing, to Darlene Graham at the above address: September 9, 2016. NOTE: Failure to object to the distribution prior to the proceeding will not affect your right to contest any information contained in these documents at the proceeding.

**OTHER IMPORTANT INFORMATION:**

Pursuant to Virginia Code § 54.1-2409(D), reinstatement of your license requires the affirmative vote of three-fourths of the members of the Board in attendance at the hearing.

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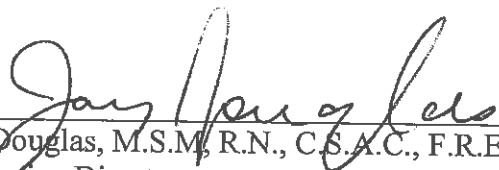
**STATEMENT OF ALLEGATIONS**

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The Board of Nursing alleges that grounds exist to refuse to reinstate the license of Brooke E. Trent, R.N. to practice professional nursing in that:

1. Brooke E. Trent, R.N. violated Virginia Code § 54.1-3007(7) in that on or about May 20, 2016, she and the Board of Registered Nursing, Department of Consumer Affairs, State of California, entered into a Stipulated Settlement and Disciplinary Order which revoked Ms. Trent's license to practice professional nursing, stayed the revocation and placed her on probation for a period of three years. This revocation formed the basis for the mandatory suspension of Ms. Trent's Virginia License by the Department of Health Professions.

2. Ms. Trent violated Virginia Code § 54.1-3007(2), (5) and (8) and 18 VAC 90-20-300(A)(2)(e) of the Regulations Governing the Practice of Nursing in that between on or about January 15, 2014, and April 1, 2014, during the course of her employment with Medical Solutions, assigned to California Pacific Medical Center, Davis Campus, San Francisco, California, Ms. Trent submitted false timecards to her employer, and forged her supervisor's name on three of the timecards.

  
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Jay Douglas, M.S.M., R.N., C.S.A.C., F.R.E.  
Executive Director  
Virginia Board of Nursing

August 31<sup>ST</sup>, 2016  
Date