

VIRGINIA:

BEFORE THE BOARD OF NURSING

**IN RE: TERRI L. BROWN, R.N. REINSTATEMENT APPLICANT
 LICENSE NO.: 0001-123524**

NOTICE OF HEARING

Pursuant to §§ 2.2-4020, 2.2-4024(F), and 54.1-2400(11) of the Code of Virginia (1950), as amended ("Code"), Terri L. Brown, R.N., who, prior to its mandatory suspension by the Department of Health Professions on July 8, 2011, held License No. 0001-123524 to practice professional nursing in Virginia, is hereby given notice that a formal administrative hearing will be held in the presence of a panel of the Board of Nursing. The hearing will be held on November 17, 2011, at 10:00 a.m., at the offices of the Department of Health Professions, Board of Nursing, Perimeter Center, 9960 Mayland Drive, Suite 201, Henrico, Virginia 23233, at which time Ms. Brown will be afforded the opportunity to be heard in person or by counsel.

At the hearing, Ms. Brown has the following rights, among others: the right to representation by counsel; the right to have witnesses subpoenaed and to present witnesses on her behalf; the right to present documentary evidence; and the right to cross-examine adverse witnesses. If Ms. Brown desires any witnesses to appear on her behalf, she must notify the Director of Administrative Proceedings, Department of Health Professions, 9960 Mayland Drive, Suite 300, Henrico, Virginia 23233, in accordance with the Instructions for Requesting Subpoenas.

The purpose of the hearing is to receive and act upon Ms. Brown's application for reinstatement of her license to practice professional nursing in Virginia and to inquire into evidence that Ms. Brown may have violated certain laws and regulations governing nursing practice in Virginia, as more fully set forth in the Statement of Particulars below.

The burden rests upon Ms. Brown, as the applicant, to demonstrate that she is capable of resuming the safe and competent practice of professional nursing in Virginia.

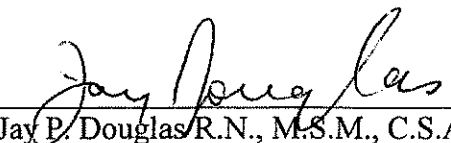
Pursuant to § 54.1-2409 of the Code, reinstatement of Ms. Brown's license requires the affirmative vote of three-fourths of the members of the Board in attendance at the hearing.

STATEMENT OF PARTICULARS

The Board alleges that:

1. Terri L. Brown, R.N., may have violated § 54.1-3007(4) of the Code in that on or about August 20, 2010, Ms. Brown was convicted of one felony count of obtaining a controlled substance by forgery in the United States District Court for the District of Columbia.
2. Ms. Brown may have violated § 54.1-3007(2) and (5) of the Code and 18 VAC 90-20-300(A)(2)(c) of the Regulations Governing the Practice of Nursing in that by her own admission, for approximately two years during the course of her employment with Medical Facility Associates, Washington, D.C., Ms. Brown forged prescriptions on a pad, taken from her employer, for Xanax (Schedule IV) and Ambien (Schedule IV) and obtained these medications for her own personal and unauthorized use, which resulted in her conviction as evidenced in allegation No. 1.
3. Ms. Brown may have violated § 54.1-3007(6) of the Code in that she may be unsafe to practice professional nursing due to her admitted substance abuse.

FOR THE BOARD


Jay P. Douglas R.N., M.S.M., C.S.A.C.
Executive Director for the
Board of Nursing

ENTERED: October 28TH, 2011