

IN THE MATTER OF  
PERMANENT CERTIFICATE  
NUMBER License 151563  
ISSUED TO  
ANGIE DAWN JACKSON

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BEFORE THE ELIGIBILITY  
AND DISCIPLINARY  
COMMITTEE  
OF THE TEXAS  
BOARD OF NURSING



I do hereby certify this to be a complete, accurate, and true copy of the document which is on file or is of record in the offices of the Texas Board of Nursing.  
*Patricia A. Thomas*  
Executive Director of the Board

**ORDER OF THE BOARD**

TO: Angie Dawn Jackson  
1220 N Nursery #201  
Irving, Texas 75061

During open meeting held in Austin, Texas, on Tuesday November 9, 2010, the Eligibility and Disciplinary Committee (hereinafter "Committee") heard the above-styled case, based on the failure of the Respondent to appear as required by 22 TEX. ADMIN. CODE Ch. 213.

The Committee of the Texas Board of Nursing finds that notice of the facts or conduct alleged to warrant disciplinary action has been provided to Respondent in accordance with Texas Government Code § 2001.054(c) and Respondent has been given an opportunity to show compliance with all the requirements of the Nursing Practice Act, chapter 301 of the Texas Occupations Code, for retention of Respondent's license to practice vocational nursing in the State of Texas.

The Committee finds that the Formal Charges were properly initiated and filed in accordance with section 301.458, Texas Occupations Code.

The Committee finds that after proper and timely Notice regarding the violations alleged in the Formal Charges was given to Respondent in this matter, Respondent has failed to appear in accordance with 22 TEX. ADMIN. CODE Ch. 213.

The Committee finds that the Board is authorized to enter a default order pursuant to Texas Government Code § 2001.056.

The Eligibility and Disciplinary Committee, after review and due consideration, adopts the

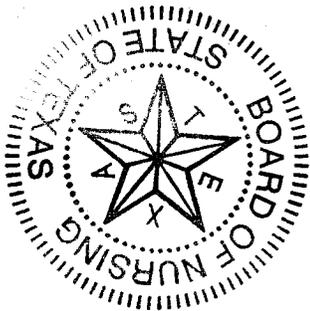
proposed findings of fact and conclusions of law as stated in the Formal Charges which are attached hereto and incorporated by reference for all purposes and the Staff's recommended sanction of revocation by default. This Order will be properly served on all parties and all parties will be given an opportunity to file a motion for rehearing [22 TEX. ADMIN.CODE § 213.16(j)]. All parties have a right to judicial review of this Order.

All proposed findings of fact and conclusions of law filed by any party not specifically adopted herein are hereby denied.

NOW, THEREFORE, IT IS ORDERED that Permanent Certificate Number 151563, previously issued to ANGIE DAWN JACKSON, to practice vocational nursing in the State of Texas be, and the same is hereby, REVOKED.

IT IS FURTHER ORDERED that this Order SHALL be applicable to Respondent's nurse licensure compact privileges, if any, to practice vocational nursing in the State of Texas.

Entered this 9th day of November, 2010.



TEXAS BOARD OF NURSING

BY:

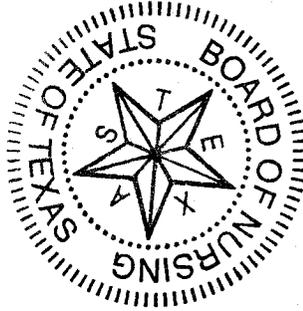
A handwritten signature in black ink, appearing to read 'Katherine A. Thomas', is written over a horizontal line.

KATHERINE A. THOMAS, MN, RN  
EXECUTIVE DIRECTOR ON BEHALF OF SAID BOARD

CERTIFICATE OF SERVICE

I hereby certify that on the 12<sup>th</sup> day of November, 2010, a true and correct copy of the foregoing DEFAULT ORDER was served by placement in the U.S. Mail via certified mail, and addressed to the following person(s):

Angie Dawn Jackson  
1220 N Nursery #201  
Irving, Texas 75061



BY: *Katherine A. Thomas*  
KATHERINE A. THOMAS, MN, RN  
EXECUTIVE DIRECTOR ON BEHALF OF SAID BOARD



## Texas Board of Nursing

333 Guadalupe Street, Ste. 3-460, Austin, Texas 78701  
Phone: (512) 305-7400 Fax: (512) 305-7401 www.bon.state.tx.us

Katherine A. Thomas, MN, RN  
Executive Director

August 3, 2010

Certified Mail No. 91 7108 2133 3938 0675 5551  
Return Receipt Requested

Angie Dawn Jackson  
1220 N Nursery #201  
Irving, Texas 75061

Dear Ms. Jackson:

Enclosed are Formal Charges which have been filed against you alleging one or more violations of Section 301.452(b) of the Nursing Practice Act, Texas Occupations Code. Within three weeks of the date of this letter, you must file a written answer to each charge admitting or denying each allegation. If you intend to deny only part of an allegation, you must specify so much of it as is true and deny only the remainder. Your answer shall also include any other matter, whether of law or fact, upon which you intend to rely for your defense. Please send your written answer to the attention of Tamika Rose, Investigator. You may obtain legal counsel at your own expense.

**FAILURE TO FILE A WRITTEN ANSWER TO THE FORMAL CHARGES, EITHER PERSONALLY OR BY LEGAL REPRESENTATIVE, WILL RESULT IN THE ALLEGATIONS CONTAINED IN THE FORMAL CHARGES BEING ADMITTED AS TRUE AND THE PROPOSED RECOMMENDATION OF STAFF WILL BE GRANTED BY DEFAULT.**

Please be advised that should you fail to file a written answer, the case will proceed on a default basis and it will be staff's recommendation that a default order be entered revoking your license or multistate privilege to practice professional nursing in the State of Texas.

The results of any default order or formal disposition (Board Order) are public information. Results of informal and formal dispositions will appear in the Board's newsletter under the heading of "Disciplinary Action."

Should you desire to discuss this matter, you may contact Tamika Rose, Investigator, Enforcement Division, at the above address, or at (512) 305-6812.

Sincerely,

Katherine A. Thomas, MN, RN  
Executive Director

KAT/TR/

Enclosure: Formal Charges

09/99-DA

### Members of the Board

Linda Rounds, PhD, FNP, RN  
Galveston, *President*

Deborah Bell, CLU, ChFC Ablene	Kristin Benton, MSN, RN Austin	Patricia Clapp, BA Dallas	Tamara Cowen, MN, RN Harlingen	Sheri Crosby, JD, SPHR Dallas	Marilyn Davis, BSN, RN, MPA Sugar Land
Blanca Rosa Garcia, PhD, RN Corpus Christi	Richard Gibbs, LVN Mesquite	Kathy Leader-Horn, LVN Granbury	Josefina Lujan, PhD, RN El Paso	Beverley Jean Nutall, LVN Bryan	Mary Jane Saigado, MEd Eagle Pass

In the Matter of Permanent License  
Number 151563, Issued to  
ANGIE DAWN JACKSON, Respondent

§ BEFORE THE TEXAS  
§  
§ BOARD OF NURSING

### FORMAL CHARGES

This is a disciplinary proceeding under Section 301.452(b), Texas Occupations Code. Respondent, ANGIE DAWN JACKSON, is a Vocational Nurse holding license number 151563, which is in delinquent status at the time of this pleading.

Written notice of the facts and conduct alleged to warrant adverse licensure action was sent to Respondent at Respondent's address of record and Respondent was given opportunity to show compliance with all requirements of the law for retention of the license prior to commencement of this proceeding.

#### CHARGE I.

On or about May 7, 2008, Respondent entered a plea of Guilty and was subsequently convicted of RESISTING ARREST(a Class A misdemeanor offense committed on May 3, 2008), in the County Court at Law Coryell County, Texas, under Cause Number 08-58112. Pursuant to TPC Article 12.45, an unadjudicated offense of Interference with Public Duties, Case Number 9007-M08 was taken into consideration, in the penalty phase of Cause Number 08-58112, and Respondent was sentenced to confinement in the Coryell County Jail for a period of sixty (60) days; however, the imposition of sentence of confinement was suspended, and Respondent was placed on probation for a period of twelve (12) months. Additionally, Respondent was ordered to pay a fine and court costs.

On December 12, 2008, Cause Number 08-58112 was Revoked for violation of terms of probation. As a result Respondent was sentenced to confinement in the Coryell County Jail for a period of sixty (60) days, with twenty-nine (29) days credit given.

The above action constitutes grounds for disciplinary action in accordance with Section 301.452(b)(10), Texas Occupations Code, and 22 TEX. ADMIN. CODE §217.12(13).

#### CHARGE II.

On or about July 8, 2008, Respondent, submitted a License Renewal Form (delinquent for over 90 days) to the Texas Board of Nursing in which she provided false, deceptive, and/or misleading information, in that she answered "No" to the question:

"Have you, within the past 24 months or since your last renewal, for any criminal offense, including those pending appeal:

- A. been convicted of a misdemeanor?
- B. been convicted of a felony?
- C. pled nolo contendere, no contest, or guilty?
- D. received deferred adjudication?
- E. been placed on community supervision or court-ordered probation, whether or not

- adjudicated guilty?
- F. been sentenced to serve jail or prison time? court-ordered confinement?
  - G. been granted pre-trial diversion?
  - H. been arrested or have any pending criminal charges?
  - I. been cited or charged with any violation of the law?
  - J. been subject of a court-martial; Article 15 violation; or received any form of military judgement/punishment/action?"

Respondent failed to disclose that on or about May 7, 2008, Respondent entered a plea of Guilty and was subsequently convicted of RESISTING ARREST (a Class A misdemeanor offense committed on May 3, 2008), in the County Court at Law Coryell County,

The above action constitutes grounds for disciplinary action in accordance with Section 301.452(b)(2)&(10), Texas Occupations Code, and is a violation of 22 TEX. ADMIN. CODE §217.12(6)(I).

NOTICE IS GIVEN that staff will present evidence in support of the recommended disposition of up to revocation of Respondent's license to practice nursing in the State of Texas pursuant to the Board's rules, 22 TEX. ADMIN. CODE §§ 213.27 - 213.33. Additionally, staff will seek to impose on Respondent the administrative costs of the proceeding pursuant to Section 301.461, Texas Occupations Code. The cost of proceedings shall include, but is not limited to, the cost paid by the Board to the State Office of Administrative Hearings and the Office of the Attorney General or other Board counsel for legal and investigative services, the cost of a court reporter and witnesses, reproduction of records, Board staff time, travel, and expenses. These shall be in an amount of at least one thousand two hundred dollars (\$1200.00).

NOTICE IS GIVEN that all statutes and rules cited in these Charges are incorporated as part of this pleading and can be found at the Board's website, [www.bon.state.tx.us](http://www.bon.state.tx.us).

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CONTINUED ON NEXT PAGE.

NOTICE IS GIVEN that to the extent applicable, based on the Formal Charges, the Board will rely on Adopted Disciplinary Guidelines for Criminal Conduct and on Adopted Disciplinary Sanction Policies for Lying and Falsification, which can be found at the Board's website, [www.bon.state.tx.us](http://www.bon.state.tx.us).

NOTICE IS GIVEN that, based on the Formal Charges, the Board will rely on the Disciplinary Matrix, which can be found at [www.bon.state.tx.us/disciplinaryaction/discp-matrix.html](http://www.bon.state.tx.us/disciplinaryaction/discp-matrix.html).

NOTICE IS ALSO GIVEN that Respondent's past disciplinary history, as set out below and described in the Orders which are attached and incorporated by reference as part of these charges, will be offered in support of the disposition recommended by staff: Agreed Order dated March 6, 2001, Agreed Order dated, June 10, 2002, Agreed Order dated, and March 4, 2003.

Filed this 2nd day of August, 2010.

TEXAS BOARD OF NURSING



James W. Johnston, General Counsel

Board Certified - Administrative Law

Texas Board of Legal Specialization

State Bar No. 10838300

Jena Renee Koslan Abel, Assistant General Counsel

State Bar No. 24036103

Lance Robert Brenton, Assistant General Counsel

State Bar No. 24066924

Robert Kyle Hensley, Assistant General Counsel

State Bar No. 50511847

Nikki Hopkins, Assistant General Counsel

State Bar No. 24052269

John F. Legris, Assistant General Counsel

State Bar No. 00785533

TEXAS BOARD OF NURSING

333 Guadalupe, Tower III, Suite 460

Austin, Texas 78701

P: (512) 305-6824

F: (512) 305-8101 or (512)305-7401

Attachments: Orders of the Board dated March 6, 2001, June 10, 2002, and March 4, 2003

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BOARD OF VOCATIONAL NURSE  
EXAMINERS

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STATE OF TEXAS

VS.

ANGIE DAWN JACKSON

COUNTY OF TRAVIS

### COMPLAINT

BEFORE ME, the undersigned authority, a Notary Public in and for the State of Texas, on this day personally appeared Lynda G. Pringle, who after being by me duly sworn, did depose and say:

As an Investigator for the Board of Vocational Nurse Examiners, I, Lynda G. Pringle, do hereby present to the Executive Director of the Board of Vocational Nurse Examiners, the following complaint against ANGIE DAWN JACKSON, a practitioner of vocational nursing in Texas licensed by the Board of Vocational Nurse Examiners with license number 151563, hereinafter called Respondent.

#### I.

a. Respondent is a vocational nurse, licensed by the State of Texas, and holds license number 151563. The Board of Vocational Nurse Examiners conducted a random continuing education audit regarding Respondent's licensure. Said audit revealed that Respondent had failed to complete twenty (20) contact hours of continuing education as required by the Board of Vocational Nurse Examiners' Board Rule 237.14 which states, in part, that the licensee shall complete twenty (20) contact hours of continuing education within the two (2) years immediately preceding the renewal of licensure. As a result, on or about March 6, 2001, Respondent's license was suspended by the Board until the completion of the required continuing education hours.

b. Respondent has failed to submit to the Board of Vocational Nurse Examiners proof of completion of twenty (20) contact hours of continuing education.

c. Respondent failed to advise the Board of Vocational Nurse Examiners of her change in address in accordance with Board Rule 235.46 which states in part: "Notification of change of address shall be submitted to the Board by each licensee within 10 days of change."

COMPLAINT

RE: ANGIE DAWN JACKSON, LVN #151563

PAGE 2

II.

a. Respondent was employed as a Licensed Vocational Nurse with Guardian Health Care in Fort Worth, Texas to include the period from about March 6, 2001 through about May 7, 2001.

b. While so employed with said facility, Respondent practiced vocational nursing while her vocational nursing license remained in a suspended status. Moreover, Respondent was observed by staff to be exhibiting unusual behavior. Respondent subsequently acknowledged to her employer and to the Board that she had sought treatment for substance abuse.

III.

The foregoing acts constitute unprofessional or dishonorable conduct that, in the opinion of the Board, is likely to deceive, defraud, or injure the public, in violation of the Texas Occupations Code, Chapter 302, Section 302.402 (a) (10) and Rule 239.11 of the Rules and Regulations of the Board of Vocational Nurse Examiners, Title 22, Texas Administrative Code. Rule 239.11, provides in pertinent part: that "Unprofessional Conduct" shall include, but not be limited to:

- (9) practicing vocational nursing in this state without a current Texas license;
- (26) failing to comply with board rules regarding continuing education, and/or knowingly providing false information regarding completion of educational programs;
- (27) failing to conform to the minimal standards of acceptable prevailing practice, regardless of whether or not actual injury to any person was sustained, including but not limited to:
  - (B) accepting an assignment when one's physical or emotional condition prevents the safe and effective delivery of care or accepting an assignment for which one lacks the educational preparation, experience, knowledge or ability.

COMPLAINT  
RE: ANGIE DAWN JACKSON, LVN #151563  
PAGE 3

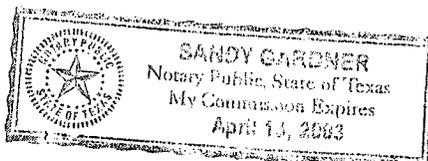
IV.

The foregoing acts constitute grounds for the Board of Vocational Nurse Examiners to take disciplinary action as provided under the Texas Occupations Code, Chapter 302, Licensed Vocational Nurse, Section 302.403 and Section 302.451, relief such as revocation, suspension, suspension with probation, reprimand, warning, denial of licensure and/or imposition of administrative penalties (fines), may be recommended by the Board. Pursuant to Board Rule 239.19 the Board may assess penalties (fines), in the minimum amount of two hundred fifty dollars (\$250.00), not to exceed two thousand dollars (\$2,000.00).

WHEREFORE, PREMISES CONSIDERED, I, Lynda G. Pringle, do hereby suggest and request the Board of Vocational Nurse Examiners take disciplinary action against ANGIE DAWN JACKSON, LVN #151563, in accordance with the provisions of the laws of the State of Texas.

Lynda G. Pringle  
AFFIANT

SUBSCRIBED AND SWORN TO BEFORE ME by the said Lynda G. Pringle, on this the day 28<sup>th</sup> February 2002.



Sandy Gardner  
NOTARY PUBLIC IN AND FOR  
THE STATE OF TEXAS  
My Commission Expires 4/11/03

COMPLAINT  
RE: ANGIE DAWN JACKSON, LVN #151563  
PAGE 4

Filed with the Board of Vocational Nurse Examiners on the 28<sup>th</sup> day of February 2002.

A handwritten signature in black ink, appearing to read 'Kirby W. Hattox', written over a horizontal line.

Kirby W. Hattox, Supervisor  
Enforcement Division  
Board of Vocational Nurse Examiners

BOARD OF VOCATIONAL  
NURSE EXAMINERS

VS

ANGIE DAWN JACKSON

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STATE OF TEXAS

COUNTY OF TRAVIS

**AGREED BOARD ORDER**

On this day came to be considered by the Board of Vocational Nurse Examiners for the State of Texas, hereinafter referred to as the Board, the matter of vocational nurse license number 151563, held by ANGIE DAWN JACKSON hereinafter called Respondent.

A sworn Complaint has been filed and served on the Respondent, which alleges violations of the Texas Occupations Code, Chapter 302, and grounds to take disciplinary action against Respondent.

An informal conference was held on April 2, 2002, at the office of the Board of Vocational Nurse Examiners. The conference was conducted by Terrie L. Hairston, R.N., C.H.E., Hearing Officer, assisted by Cathy Parrot, LVN, member of the Board of Vocational Nurse Examiners. Respondent was present and was not represented by counsel.

The conference was attended by Lynda G. Pringle, Investigator for the Board, and Ms. Melissa Juarez, Assistant Attorney General. By their notarized signature on this Order, Respondent does hereby waive the right to Notice of Formal Hearing and a Formal Hearing of the Complaint before the Board, and to judicial review of this disciplinary action after this Order is ratified by the Board.

AGREED BOARD ORDER  
RE: ANGIE DAWN JACKSON, LVN #151563  
PAGE 2

After reviewing the Complaint and information provided at the informal conference, Respondent agrees to the entry of an Order dispensing with the need for further proceedings on the Complaint. By Respondent's signature on this Order, Respondent neither admits nor denies the truth of the allegations stated in the Complaint. By Respondent's signature on this Order, Respondent acknowledges that they have read and understood this Order and have approved it for consideration by the Board. Notice of this disciplinary action will appear in the Board's newsletter sent to Texas employers.

**ORDER OF THE BOARD**

**NOW THEREFORE, IT IS ORDERED**, that license number 151563, heretofore issued to ANGIE DAWN JACKSON to practice vocational nursing in the State of Texas be, and the same is hereby issued an administrative fine in the amount of \$250.00, said fine shall be in the form of a cashier's check or money order, payable to the Board of Vocational Examiners. Said fine shall be paid in monthly installments of \$50.00, due on the 30th of each month, commencing the month following the date of the Boards ratification of this Order, and continuing thereafter until the full amount of the fine has been paid. Said fee shall be sent to the Board office, addressed to the "Board of Vocational Nurse Examiners", 333 Guadalupe, Suite 3-400, Austin, TX 78701.

This Agreed Order shall not be effective or take effect and become enforceable in accordance with its terms until ratified by a majority of the Board present and voting, at its next regularly called session.

AGREED BOARD ORDER  
RE: ANGIE DAWN JACKSON, LVN #151563  
PAGE 3

Dated this the 2<sup>nd</sup> day of April, 2002.

Angie Jackson  
Signature of Respondent

304 Commanche walk  
Current Address

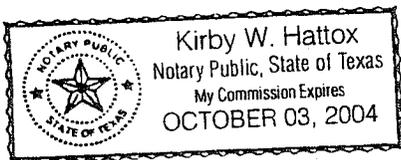
Joshua Tx ~~76058~~ 76058  
City, State and Zip

817 / 774-3638  
Area Code and Telephone Number

The State of Texas  
County of TRAVIS

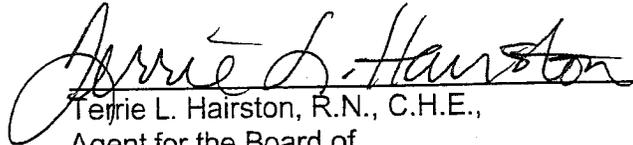
Before me, the undersigned authority, on this day personally appeared ANGIE DAWN JACKSON who being duly sworn by me stated that he or she executed the above for the purpose therein contained, and that he or she understood same.

SWORN TO AND SUBSCRIBED before me this the 2<sup>nd</sup> day of April, 2002.

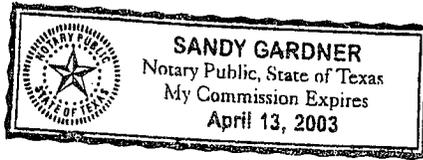


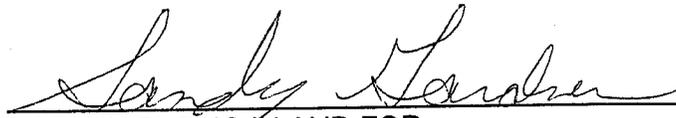
[Signature]  
NOTARY PUBLIC IN AND FOR  
THE STATE OF TEXAS  
My Commission Expires \_\_\_\_\_

AGREED BOARD ORDER  
RE: ANGIE DAWN JACKSON, LVN #151563  
PAGE 4

  
Terrie L. Hairston, R.N., C.H.E.,  
Agent for the Board of  
Vocational Nurse Examiners

SWORN TO AND SUBSCRIBED before me, the undersigned authority, on this the  
9th day of May, 2002.

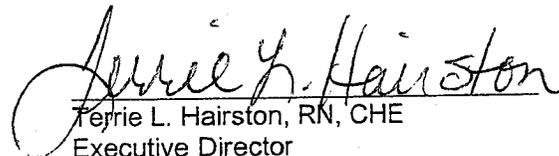


  
NOTARY PUBLIC IN AND FOR  
THE STATE OF TEXAS  
My Commission Expires 4/13/03

BOARD ORDER  
RE: ANGIE DAWN JACKSON, LVN #151563  
PAGE: 5

**WHEREFORE, PREMISES CONSIDERED,** the Board of Vocational Nurse Examiners for the State of Texas does hereby ratify and adopt the Agreed Board Order, notarized on the 2<sup>nd</sup> day of April, 2002 by Respondent, license number 151563 and that Said Order is Final.

Effective this 10<sup>th</sup> day of June, 2002

  
Terrie L. Hairston, RN, CHE  
Executive Director  
On Behalf of Said Board

**BOARD ORDER**

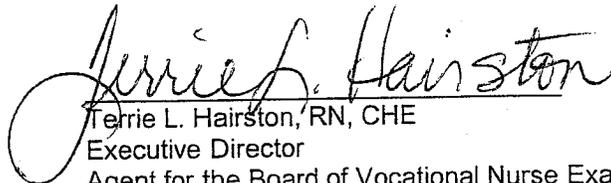
RE: ANGIE DAWN JACKSON, LVN #151563

PAGE: 6

**CERTIFICATE OF SERVICE**

I hereby certify that on the 14<sup>th</sup> day of June, 2002, a true and correct copy of the foregoing **BOARD ORDER** was served by placement in the U.S. Mail, first class, and addressed to the following person(s):

ANGIE DAWN JACKSON  
304 COMANCHE WALK  
JOSHUA, TX 76058

  
Terrie L. Hairston, RN, CHE  
Executive Director  
Agent for the Board of Vocational Nurse Examiners

IN THE MATTER OF PERMANENT

LICENSE NUMBER #151563

ISSUED TO

ANGIE DAWN JACKSON

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BEFORE THE BOARD OF

VOCATIONAL NURSE EXAMINERS

IN AND FOR THE

STATE OF TEXAS

### DEFAULT ORDER

TO: ANGIE DAWN JACKSON  
2102 AMY LYN  
ABILENE, TEXAS 79603

On this day came to be considered by the Board of Vocational Nurse Examiners for the State of Texas, hereinafter referred to as "the Board", the matter of vocational nurse license number 151563 held by ANGIE DAWN JACKSON hereinafter called "Respondent".

A sworn Complaint has been filed in accordance with the TEX. OCC. CODE ANN. § 302.403 & § 302.404 and served on the Respondent, pursuant to TEX. GOV'T CODE ANN. Chapter 2001 (Vernon 2000), 22 TEX. ADMIN. CODE (TAC) § 239.23 (1999); which alleges violations of the Texas Occupations Code, Chapter 302, and grounds to take disciplinary action against Respondent.

During open meeting on March 4, 2003, at Austin, Texas, the Board finds that, after proper and timely notice was given in the above-styled case, Respondent has failed to file an "Answer to Appear".

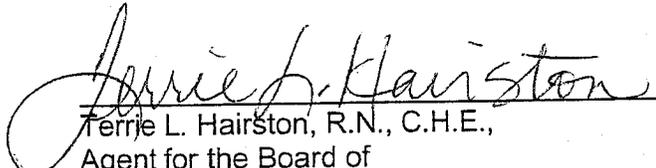
The Board, after review and due consideration of Respondent's failure to enter an appearance, in accordance with 22 TEX. ADMIN. CODE (TAC) § 239.46 (2000), ratifies and adopts the Default Order.

DEFAULT ORDER – SUSPEND  
RE: ANGIE DAWN JACKSON, LVN #151563  
PAGE 2

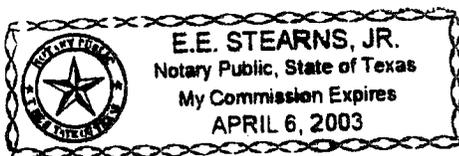
**NOW, THEREFORE, IT IS ORDERED** that License Number #151563 heretofore issued to ANGIE DAWN JACKSON to practice vocational nursing in the State of Texas be, and the same is hereby, **SUSPENDED**. Said suspension shall remain in effect until Respondent submits an administrative fine and documentation indicating the successful completion of the required Mandatory Continuing.

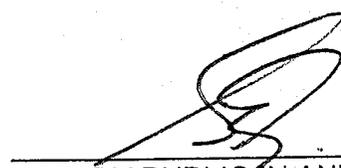
Education as defined in Board Rule 237.14, Chapter 237. That the Administrative fine be in the amount of two hundred fifty dollars (\$250.00). Said fine shall be in the form of a cashier's check or money order, payable to the Board of Vocational Nurse Examiners. Said fine shall be sent to the Board of Vocational Nurse Examiners, 333 Guadalupe, Suite 3-400, Austin, TX 78701.

Appeals from a final decision or Order of the Board must be made pursuant to the requirements of the Administrative Procedure Act, TEX. GOV'T CODE, ANN., Chapter 2001, § 2001.146, as amended. A motion for rehearing must be filed the Board within 20 days from the date of this notice, as a jurisdictional prerequisite to an Appeal.

  
Terrie L. Hairston, R.N., C.H.E.,  
Agent for the Board of  
Vocational Nurse Examiners

SWORN TO AND SUBSCRIBED before me, the undersigned authority, on this the 4<sup>th</sup> day of March, 2003.

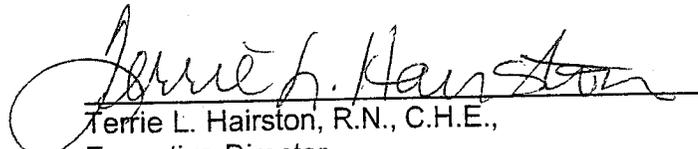


  
NOTARY PUBLIC IN AND FOR  
THE STATE OF TEXAS

DEFAULT ORDER – SUSPEND  
RE: ANGIE DAWN JACKSON, LVN #151563  
PAGE 3

**WHEREFORE, PREMISES CONSIDERED,** the Board of Vocational Nurse Examiners for the State of Texas does hereby ratify and adopt the Default Order, on the 4<sup>th</sup> day of March, 2003, that Said Order is Final in the matter of ANGIE DAWN JACKSON, LVN #151563.

**Effective this 4<sup>th</sup> day of March, 2003.**

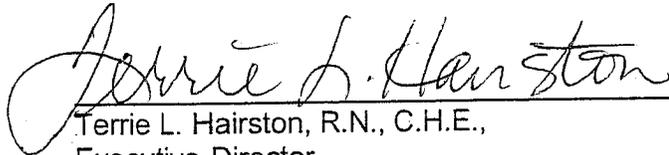
  
Terrie L. Hairston, R.N., C.H.E.,  
Executive Director  
On Behalf of Said Board

DEFAULT ORDER – SUSPEND  
RE: ANGIE DAWN JACKSON, LVN #151563  
PAGE 4

**CERTIFICATE OF SERVICE**

I hereby certify that on the 7<sup>th</sup> day of March, 2003, a true and correct copy of the foregoing **DEFAULT ORDER** was served by placement in the U.S. Mail first class mail, and addressed to the following person(s):

ANGIE DAWN JACKSON  
2102 AMY LYN  
ABILENE, TEXAS 79603

A handwritten signature in cursive script, reading "Terrie L. Hairston", is written over a horizontal line.

Terrie L. Hairston, R.N., C.H.E.,  
Executive Director  
Agent for the Board of Vocational Nurse Examiners

IN THE MATTER OF PERMANENT	§	BEFORE THE BOARD OF
LICENSE NUMBER 151563	§	VOCATIONAL NURSE EXAMINERS
ISSUED TO	§	IN AND FOR
ANGIE DAWN JACKSON	§	THE STATE OF TEXAS

**ORDER OF THE BOARD**

TO: ANGIE DAWN JACKSON  
P. O. BOX 895  
CROWLEY, TX 76036

During open meeting at Austin, Texas, the Board of Vocational Nurse Examiners finds that after proper and timely notice was given, the above-styled case was heard by an Administrative Law Judge who made and filed a proposal for decision containing the Administrative Law Judge's findings of fact and conclusions of law. The proposal for decision was properly served on all parties and all parties were given an opportunity to file exceptions and replies as part of the record herein.

The Board of Vocational Nurse Examiners, after review and due consideration of the proposal for decision, and exceptions and replies filed, if any, adopts the findings of fact and conclusions of law of the Administrative Law Judge as if fully set out and separately stated herein. All proposed findings of fact and conclusions of law not specifically adopted herein are hereby denied.

NOW, THEREFORE, IT IS ORDERED that License Number 151563 heretofore issued to ANGIE DAWN JACKSON to practice vocational nursing in the State of Texas be, and the same is hereby, suspended until she comes into compliance with the Board's rules regarding continuing education and pays a \$250.00 administrative fine.

511-01-0127

ANGIE DAWN JACKSON, LVN# 151563

Passed and approved at the regular meeting of the Board of Vocational Nurse Examiners in  
and for the State of Texas at Austin, Texas, on the 6<sup>th</sup> day of March 2001.

Janette L. Bowers

Geneva Hamey

Melody Hart

Lillian Snow

Cathy Faust

Rachel Jooney

Shirley Powell

[Signature]

Beverly Nuttall

Antia Salmer

Dee H. Howard

**ORDER:**

RE: ANGIE DAWN JACKSON, LVN #151563

PAGE: 3

**CERTIFICATE OF SERVICE**

I hereby certify that on the 9<sup>TH</sup> day of March, 2001, a true and correct copy of the foregoing **Complaint** was served by placement in the U.S. Mail first class and certified mail, and addressed to the following person(s):

ANGIE DAWN JACKSON  
P.O. BOX 895  
CROWLEY, TX 76036



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Mary M. Strange, RN, MSN  
Executive Director

Agent for the Board of Vocational Nurse Examiners

BOARD OF VOCATIONAL NURSE  
EXAMINERS

VS

ANGIE DAWN JACKSON

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STATE OF TEXAS

COUNTY OF TRAVIS

### COMPLAINT

BEFORE ME, the undersigned authority, a Notary Public in and for the State of Texas on this day personally appeared Carolyn Hudson, who after being by me duly sworn, did depose and say:

As an Investigator for the Board of Vocational Nurse Examiners, I, Carolyn Hudson, do hereby present to the Executive Director of the Board of Vocational Nurse Examiners, the following complaint against ANGIE DAWN JACKSON, a practitioner of vocational nursing in Texas licensed by the Board of Vocational Nurse Examiners with license number 151563, hereinafter called Respondent.

#### I.

- a. Respondent is a vocational nurse, licensed by the State of Texas, and holds license number 151563.
- b. On or about July 9, 1999, Respondent submitted her license renewal form to the Board office. On said form Respondent inaccurately answered "yes" to the question "Have you acquired twenty (20) contact hours of continuing education in the renewal period just completed?".
- c. Respondent had failed to complete twenty (20) contact hours of continuing education between May 1, 1997 and June 30, 1999 as required by the Board of Vocational Nurse Examiners (Board) Rules and Regulations.
- d. Board Rule 237.14 states that twenty (20) contact hours of continuing education within the two (2) years immediately preceding renewal of licensure are required.

#### II.

Respondent has violated the Texas Occupations code, a rule or order issued under this code, contrary to the Texas Occupations Code, Chapter 302, Section 302.402 (a) (1).

III.

The foregoing acts constitute unprofessional or dishonorable conduct that, in the opinion of the Board, is likely to deceive, defraud, or injure the public, in violation of the Texas Occupations Code, Chapter 302, Section 302.402 (a) (10), and Rule 239.11 of the Rules and Regulations of the Board of Vocational Nurse Examiners, Title 22, Texas Administrative Code. Rule 239.11, provides in pertinent part: that "Unprofessional Conduct" shall include, but not be limited to:

(8) providing information which was false, deceptive, or misleading in connection with the practice of vocational nursing or failing to answer specific questions that would have affected the decision to license, employ, certify or otherwise utilize a vocational nurse;

(26) failing to comply with board rules regarding continuing education, and/or knowingly providing false information regarding completion of educational programs.

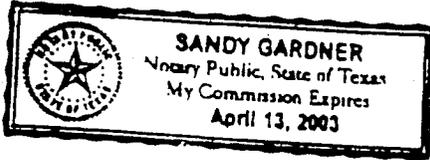
IV.

The foregoing acts constitute grounds for the Board of Vocational Nurse Examiners to take disciplinary action as provided under the Texas Occupations Code Chapter 302, Licensed Vocational Nurse, Section 302.403 and Section 302.451, relief such as revocation, suspension, suspension with probation, reprimand, warning, denial of licensure and/or imposition of administrative penalties (fines), may be recommended by the Board. Pursuant to Board Rule 239.19 the Board may assess penalties (fines), in the minimum amount of two hundred fifty dollars (\$250.00), not to exceed two thousand dollars (\$2,000.00).

WHEREFORE, PREMISES CONSIDERED, I, Carolyn Hudson, do hereby suggest and request the Board of Vocational Nurse Examiners take disciplinary action against ANGIE DAWN JACKSON, LVN # 151563, in accordance with the provisions of the laws of the State of Texas.

  
\_\_\_\_\_  
AFFIANT

SUBSCRIBED AND SWORN TO BEFORE ME by the said Carolyn Hudson, on this the 13th day of July 2000



*Sandy Gardner*  
NOTARY PUBLIC IN AND FOR  
THE STATE OF TEXAS

Filed with the Board of Vocational Nurse Examiners on the 13th day of July 2000.

*Mary M. Strange*  
Mary M. Strange, BSN, RN, CNA  
Executive Director  
Board of Vocational Nurse Examiners

BOARD OF VOCATIONAL NURSE  
EXAMINERS

VS.

ANGIE JACKSON

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\*  
\*  
\*  
\*  
\*

STATE OF TEXAS

COUNTY OF TRAVIS

### COMPLAINT

BEFORE ME, the undersigned authority, a Notary Public in and for the State of Texas, on this day personally appeared Carolyn Hudson, who after being by me duly sworn, did depose and say:

As an Investigator for the Board of Vocational Nurse Examiners, I, Carolyn Hudson, do hereby present to the Executive Director of the Board of Vocational Nurse Examiners, the following complaint against ANGIE JACKSON, a practitioner of vocational nursing in Texas licensed by the Board of Vocational Nurse Examiners with license number 151563, hereinafter called Respondent.

I.

- a. On June 10, 2002, the Board of Vocational Nurse Examiners endorsed an Agreed Board Order in which Respondent's license to practice Vocational Nursing in Texas was assessed an Administrative Fine, in the amount of \$250.00 (two hundred and fifty dollars).
- b. Said Order stipulated, in part, that said fine shall be paid in monthly installments of \$50.00 due on the 30<sup>th</sup> of each month.
- c. Respondent has failed to submit monthly installments of \$50.00 on or before the due dates of August 30, 2002 and September 30, 2002.
- d. By said conduct Respondent has violated the terms of her Agreed Board Order.

COMPLAINT  
RE: ANGIE JACKSON, LVN #151563  
PAGE 2

II.

Respondent has violated the Texas Occupations Code, a rule or order issued under this code, contrary to the Texas Occupations Code, Chapter 302, Section 302.402 (a) (1).

III.

The foregoing acts constitute grounds for the Board of Vocational Nurse Examiners to take disciplinary action as provided under the Texas Occupations Code Chapter 302, Licensed Vocational Nurse, Section 302.403 and Section 302.451, relief such as revocation, suspension, suspension with probation, reprimand, warning, denial of licensure and/or imposition of administrative penalties (fines), may be recommended by the Board. Pursuant to Board Rule 239.19 the Board may assess penalties (fines), in the minimum amount of two hundred fifty dollars (\$250.00), not to exceed two thousand dollars (\$2,000.00).

WHEREFORE, PREMISES CONSIDERED, I, Carolyn Hudson, do hereby suggest and request the Board of Vocational Nurse Examiners take disciplinary action against ANGIE JACKSON, LVN # 151563, in accordance with the provisions of the laws of the State of Texas.

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AFFIANT

SUBSCRIBED AND SWORN TO BEFORE ME by the said Carolyn Hudson, on this the 9th day of December 2002.

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NOTARY PUBLIC IN AND FOR

COMPLAINT  
RE: ANGIE JACKSON, LVN #151563  
PAGE 3

Filed with the Board of Vocational Nurse Examiners on the 9th day of December 2002.

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Kirby W. Hattox, Supervisor  
Enforcement Division  
Board of Vocational Nurse Examiners

**SYNOPSIS**

RE: ANGIE JACKSON, LVN #151563

On June 10, 2002, the Board of Vocational Nurse Examiners endorsed an Agreed Board Order in which Respondent's license to practice Vocational Nursing in Texas was assessed an Administrative Fine, in the amount of \$250.00 (two hundred and fifty dollars).

**NOTE:** Said Order was based on the allegations that Respondent while employed as a Licensed vocational Nurse with Guardian Health Care in Ft. Worth, Texas practiced vocational nursing while her vocational nursing license remained in a suspended status. Respondent was also observed by staff to be exhibiting unusual behavior.

**NOTE:** On March 6, 2001, the Board of Vocational Nurse Examiners endorsed an Order in which Respondent's license to practice Vocational Nursing in Texas was suspended until she comes into compliance with the Board's rules regarding continuing education and pays a \$250.00 fine.

**NOTE:** Said Order was based on the allegations that Respondent failed to complete twenty (20) contact hours of continuing education.

Said Order stipulated, in part, that said fine shall be paid in monthly installments of \$50.00 due on the 30<sup>th</sup> of each month.

Respondent has failed to submit monthly installments of \$50.00 on or before the due dates of August 30, 2002 and September 30, 2002.

By said conduct Respondent has violated the terms of her Agreed Board Order.

On November 1, 2002, Respondent was sent an opportunity letter by U.S. First Class mail advising them of the allegations.

Notice of the Informal Conference, cover letter, complaint and "written answer to appear" were sent to Respondent by certified and regular mail on December 9, 2002.

The Certified mail was \_\_\_\_\_  
\_\_\_\_\_

The Regular Mail was \_\_\_\_\_  
\_\_\_\_\_

The Written Answer to Appear was/was not \_\_\_\_\_  
\_\_\_\_\_

The Complaint, and Notice of Administrative Hearing and cover letter were sent to Respondent by certified and regular mail on \_\_\_\_\_  
\_\_\_\_\_

The Certified mail was \_\_\_\_\_  
\_\_\_\_\_

The Regular Mail was \_\_\_\_\_  
\_\_\_\_\_

The Written Answer to Appear was/was not \_\_\_\_\_  
\_\_\_\_\_

SYNOPSIS  
RE: ANGIE JACKSON, LVN #151563  
PAGE 2

**EXHIBITS**

**BOARD EXHIBIT ONE:**

True and certified copies of records of the Board of Vocational Nurse Examiners:

- a. Computer Print-out
- b. Cover Letter and Board Order, dated March 6, 2001.
- b. Cover Letter and Board Order, dated June 10, 2002.
- c. Opportunity Letter
- d. Certified Return Receipt
- e. Complaint and Informal Conference Cover Letter
- f. Certified Return Receipt
- g. Notice of Administrative Hearing, Cover Letter
- h. Certified Return Receipt

**BOARD EXHIBIT TWO:**

True and certified copy of Board of Vocational Nurse Examiners Update Case Form

**BOARD EXHIBIT THREE:**

True and certified copy of Board of Vocational Nurse Examiners Reminder Letter

**RESPONDENT'S EXHIBIT ONE:**