

001223



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 P. Thomas*  
Executive Director of the Board

BOARD OF VOCATIONAL NURSE  
EXAMINERS

STATE OF TEXAS

VS.

DEBORAH LYNN SAUNDERS

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 DEBORAH LYNN SAUNDERS, a practitioner of vocational nursing in Texas licensed by the Board of Vocational Nurse Examiners with license number 122339, hereinafter called Respondent

**I.**

- a. Respondent is a vocational nurse, licensed by the State of Texas, and holds license number 143100.
- b. On or about August 18, 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 August 1, 1997 and July 31, 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).

COMPLAINT  
RE: DEBORAH LYNN SAUNDERS, LVN #122339  
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## 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.

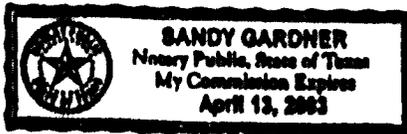
The foregoing acts constitute grounds for the Board of Vocational Nurse Examiners to take disciplinary action as provided under the Texas Occupations Code Chapter 302, Licensed Vocational Nurse, Section 302.403 and Section 302.451, relief such as revocation, suspension, suspension with probation, reprimand, 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 DEBORAH LYNN SAUNDERS, LVN # 122339, in accordance with the provisions of the laws of the State of Texas.

  
\_\_\_\_\_  
AFFIANT

COMPLAINT  
RE: DEBORAH LYNN SAUNDERS, LVN #122339  
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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.

DEBORAH LYNN SAUNDERS

• STATE OF TEXAS  
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•  
•

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• COUNTY OF TRAVIS

**AGREED BOARD ORDER**

On this day came to be considered by the Board of Vocational Nurse Examiners the matter of vocational nurse license number 122339 held by DEBORAH LYNN SAUNDERS, hereinafter called Respondent.

By letter, the Board of Vocational Nurse Examiners sent preliminary notice to Respondent of its intent to take disciplinary action with respect to said license held by Respondent, as a result of a complaint and subsequent investigation. Said investigation produced evidence indicating that Respondent has engaged in unprofessional or dishonorable conduct that, in the opinion of the Board, is likely to deceive, defraud, or injure the public, in violation of the Health Occupations Code, Chapter 302, contrary to Section 302.402 (a) (10), in the following manner:

- a. Respondent is a vocational nurse, licensed by the State of Texas, and holds license number 122339.
- b. On or about August 18, 1999, Respondent submitted her license renewal form to the Board office. On said form Respondent falsely 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 August 1, 1997, and July 31, 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.

By Respondent's signature on this Order, Respondent neither admits nor denies the truth of the matters previously set out in this Order with respect to the above-mentioned investigation. By

AGREED BOARD ORDER  
RE: DEBORAH LYNN SAUNDERS, LVN #122339  
PAGE 2

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C.E.  
250.00  
00722339  
fine  
SEP 08 2000

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.

By their notarized signature on this Order, Respondent does hereby waive the right to a formal Complaint, Notice of Hearing and a Public Hearing held before an Administrative Law Judge with the State Office of Administrative Hearings, and to judicial review of this disciplinary action. 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, subject to ratification by the Board of Vocational Nurse Examiners that License Number 122339, heretofore issued to DEBORAH LYNN SAUNDERS, 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 Nurse Examiners, within thirty (30) days of the date of the Board's endorsement of this Order. Said fee shall be sent to the Board of Vocational Nurse Examiners, 333 Guadalupe, Suite 3-400, Austin, TX 78701.

Respondent shall successfully complete the required twenty (20) contact hours of Mandatory Continuing Education (CE) as defined in Board Rule 237.14 and submit documentation of successful completion of the CE requirements to the Board office within thirty (30) days of the endorsement of this Order.

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.

Dated this the 31<sup>st</sup> day of August, 2000

[Signature]  
Signature of Respondent

2421 Crews St.  
Current Address

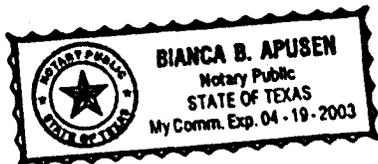
Corpus Christi, TX 78405  
City, State and Zip

3611 882-4242  
Area Code and Telephone Number

The State of Texas  
County of Nueces

Before me, the undersigned authority, on this day personally appeared DEBORAH LYNN SAUNDERS, 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.

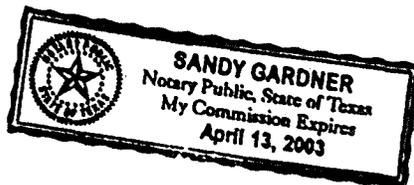
SWORN TO AND SUBSCRIBED before me on this the 31<sup>st</sup> day of August, 2000



[Signature]  
NOTARY PUBLIC IN AND FOR  
THE STATE OF TEXAS  
My Commission Expires 4-19-2003

[Signature]  
Agent for the Board of  
Vocational Nurse Examiners

SWORN TO AND SUBSCRIBED before me, the undersigned authority, on this the 12<sup>th</sup> day of October, 2000.



[Signature]  
NOTARY PUBLIC IN AND FOR  
THE STATE OF TEXAS

00122339

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RE: DEBORAH LYNN SAUNDERS, LVN #122339  
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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 31st day of August, 2000 by Respondent, license number 122339 and that  
Said Order is Final.

Effective this 4th day of December, 2000.

  
\_\_\_\_\_  
Mary M. Strange, BSN, RN, CNA  
Executive Director  
On Behalf of Said Board

00122339

BOARD ORDER  
RE: DEBORAH LYNN SAUNDERS, LVN #122339  
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CERTIFICATE OF SERVICE

I hereby certify that on the 8<sup>th</sup> day of December, 2000, 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):

DEBORAH LYNN SAUNDERS  
2421 CREWS ST  
CORPUS CHRISTI, TX 78405



Mary M. Strang, BSN, RN, CNA  
Executive Director  
Agent for the Board of Vocational Nurse Examiners