The attached are Primary Source Documents of the Idaho Board of Nursing for:

CHRISTINE PATE
PN-11756

Idaho Board of Nursing – PO Box 83720 – Boise, Idaho 83720-0061 – (208) 334-3110
BEFORE THE IDAHO STATE BOARD OF NURSING  

In the Matter of the License of:  
CHRISTINE L. PATE,  
License No. PN-11756,  
Respondent.  

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Case No. 05-004  

FINDINGS OF FACT,  
CONCLUSIONS OF LAW  
AND FINAL ORDER  

Pursuant to her request for a hearing before the Idaho State Board of Nursing (hereinafter "Board"), Respondent Christine L. Pate (hereinafter "Respondent") appeared before the Board during its regularly scheduled meeting at 11:30 a.m., Thursday, November 10, 2005. Respondent appeared without benefit of counsel. The State of Idaho was represented by Cheri Bush, Deputy Attorney General.

Kay Christensen, Deputy Attorney General, acted as Hearing Officer during the proceedings. Members of the Board participating in the hearing were Chairman Randall Hudspeth, N.P., C.N.S., and members Shirlie Meyer, RN, Analyn Frasure, LPN, Karen Ellis, RN, Jill Howell, RN, Susan Odom, PhD, RN, Ridon Jones, LPN, Janine Baxter, RN, and Linda Humphrey, Consumer Member of the Board. Testifying before the Board were Chanel Johnson, Investigator, Idaho State Board of Nursing, Lorraine Reinhardt, Chief Nursing Officer of Gooding County Memorial Hospital, and the Respondent.

Prior to the hearing, Respondent filed a written statement in the board office. This statement was made available to the Board for review. The Board, having reviewed the documents and correspondence contained in the administrative file in this matter, and having heard the testimony of Chanel Johnson and Lorraine Reinhardt, and the testimony of Respondent in her own defense, and good cause appearing therefore, hereby enters the following Findings of Fact, Conclusions of Law, and Final Order:

FINDINGS OF FACT, CONCLUSIONS OF LAW AND FINAL ORDER - 1
FINDINGS OF FACT

1. Respondent Christine L. Pate ("Respondent") is a duly licensed nurse in the state of Idaho, holding License No. PN-11756.

2. On or about June 6, 2005, the Board received a complaint from Gooding County Memorial Hospital indicating that Respondent had been terminated from her employment after having provided medications to a patient without first notifying the physician’s assistant or obtaining orders for administration of the medication.

3. During an interview with the Board’s investigator, and again in her testimony and written statement to the Board, Respondent acknowledged that she had provided medications to an individual who had come to the hospital complaining of chest pain, that she had not admitted the patient, that she had not notified the staff physician’s assistant who was on duty, that she had not conducted any examination or obtained any vitals, obtained any orders or a prescription for the medications that were provided, and or created any chart or other record regarding this treatment.

4. Respondent testified that the patient had resisted being admitted to the hospital and did not wish to have treatment but that the patient’s wife was insistent that the patient be provided medical assistance. Respondent testified that she prepared and provided the patient with a "GI cocktail" in an attempt to provide him relief from his symptoms, based on the patient’s report of success with similar medications at home. Respondent testified that she provided additional medications to the patient upon departure from the hospital, based on the apparent positive impact of the medications she had provided earlier.
5. Respondent testified that, when originally questioned by her employer, she did not remember the incident but that she did remember the incident later.

CONCLUSIONS OF LAW

1. The facts as stated above fall within the regulatory jurisdiction of the Idaho State Board of Nursing as set forth in title 54, chapter 14, Idaho Code.

2. Failure to comply with the requirements of title 54, chapter 14, Idaho Code and the duly promulgated rules of the Idaho Board of Nursing constitutes grounds for the imposition of a disciplinary sanction against a license pursuant to Idaho Code Section 54-1413(1).

3. Furnishing or administering prescription drugs to any person, except as directed by a person authorized by law to prescribe drugs is a violation of Idaho Code Section 54-1413(1)(g) and IDAPA 23.01.01.101.04.e and constitutes grounds for the imposition of discipline.

4. Failing to observe the conditions and signs and symptoms of a patient, record the information, and report any significant changes to the appropriate person is a violation of Idaho Code Section 54-1413(1)(g) and IDAPA 23.01.01.101.04.i and constitutes grounds for the imposition of discipline.

5. Failing to function as a member of the health team and collaborate with other health team members as necessary to meet the patient’s health needs is a violation of Idaho Code Section 54-1413(1)(g) and IDAPA 23.01.01.101.04.j and constitutes grounds for the imposition of discipline.

6. Failing to be responsible and accountable for nursing judgments, actions and competence is a violation of Idaho Code Section 54-1413(1)(g) and IDAPA 23.01.01.101.05.c and constitutes grounds for the imposition of discipline.
7. Failing to make and keep accurate, intelligible entries into records required by employment, law, or customary practice is a violation of Idaho Code Section 54-1413(1)(g) and IDAPA 23.01.01.101.05.e and constitutes grounds for the imposition of discipline.

8. Engaging in conduct to endanger patients is a violation of Idaho Code Section 54-1413(1)(h) and IDAPA 23.01.01.100.09 constitutes grounds for the imposition of discipline.

9. Failing to function within the defined legal scope of nursing practice is a violation of Idaho Code Section 54-1413(1)(g and h) and IDAPA 23.01.01.100.05 and 23.01.01.100.09 and constitutes grounds for the imposition of discipline.

10. Violating the law, rules and standards of conduct and practice adopted by the Board constitutes a violation of Idaho Code Section 54-1413(1)(g) and IDAPA 23.01.01.100.08 and 101.01 and constitutes grounds for the imposition of discipline.

11. By her own admission, Respondent has engaged in conduct that constitutes violations of the standards of conduct and practice and duly promulgated rules of the board as set forth in Conclusions of Law numbered 3-11, above. Pursuant to Idaho Code Section 54-1413(1), these admitted violations constitute grounds for the imposition of a disciplinary sanction against Respondent’s license.

ORDER

NOW, THEREFORE, it is hereby ordered that the Respondent’s license numbered PN-11756 be, and the same is hereby SUSPENDED INDEFINITELY. Imposition of this suspension is hereby STAYED for a period of six months during which time Respondent shall REIMBURSE the Board for its costs and fees in investigating and prosecuting this disciplinary action in an amount not to exceed $500.00 and COMPLETE NURSING EDUCATION courses.

FINDINGS OF FACT, CONCLUSIONS OF LAW AND FINAL ORDER - 4
as follow: NSCBN module on delegation, the IALN L.P.N. Roles and Responsibilities course, and the on-line Nursing Practice Act course offered by the National Council of State Boards of Nursing. If respondent successfully complies with these requirements prior to the expiration of six months from the date of entry of this order, the license numbered PN-11756 shall be reinstated. If Respondent fails to complete the required courses and pay the required fees within the six month time frame, the license shall be immediately, and indefinitely, suspended.

NOTICE OF APPEAL RIGHTS

This is a final order of the agency. Any party may file a motion for reconsideration of this final order within fourteen (14) days of the service date of this order. The agency will dispose of the petition for reconsideration within twenty-one (21) days of its receipt, or the petition will be considered denied by operation of law. See § 67-5246(4), Idaho Code.

Pursuant to §§ 67-5270 and 67-5272, Idaho Code, any party aggrieved by this final order or orders previously issued in this case may appeal this final order and all previously issued orders in this case to district court by filing a petition in the district court of the county in which:

i. A hearing was held,

ii. The final agency action was taken,

iii. The party seeking review of the order resides or operates its principal place of business in Idaho, or

iv. The real property or personal property that was the subject of the agency action is located.

An appeal must be filed within twenty-eight (28) days (a) of the service date of this final order, (b) of an order denying petition for reconsideration, or (c) the failure within twenty-one (21) days to grant or deny a petition for reconsideration, whichever is later. See § 67-5273,

FINDINGS OF FACT, CONCLUSIONS OF LAW AND FINAL ORDER - 5
Idaho Code. The filing of an appeal to district court does not itself stay the effectiveness or enforcement of the order under appeal.

DATED this 28th day of November, 2005.

IDAHO STATE BOARD OF NURSING

By

Randall Hudspeth, N.P., C.N.S.
Board Chairman

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 5th day of December, 2005, I caused to be served a true and correct copy of the foregoing FINDINGS OF FACT, CONCLUSIONS OF LAW AND FINAL ORDER, addressed as follows:

Cheri Bush
Deputy Attorney General
P.O. Box 83720
Boise, ID 83720-0010

U.S. Mail, postage prepaid
Certified U.S. Mail, return receipt
Hand Delivery
Overnight Mail
Facsimile:
Statehouse Mail

Kay Christensen
Deputy Attorney General
P.O. Box 83720
Boise, ID 83720-0010

U.S. Mail, postage prepaid
Certified U.S. Mail, return receipt
Hand Delivery
Overnight Mail
Facsimile:
Statehouse Mail

Christine L. Pate
823 Nevada Street
Gooding, ID 83330

U.S. Mail, postage prepaid
Certified U.S. Mail, return receipt
Hand Delivery
Overnight Mail
Facsimile:
Statehouse Mail

Sandra Evans, M.A.Ed., R.N.
Executive Director
Board of Nursing

FINDINGS OF FACT, CONCLUSIONS OF LAW AND FINAL ORDER - 6
U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)
OFFICIAL USE

CHRISTINE L PATE
823 NEVADA STREET
GOODING ID 83330
BEFORE THE IDAHO STATE BOARD OF NURSING

In the Matter of the License of: CHRISTINE L. PATE, License No. PN-11756, Respondent.

Case No. 05-054 COMPLAINT

To: Christine L. Pate
823 Nevada St.
Gooding, ID 83330

STATEMENT OF CHARGES

1.

The Idaho State Board of Nursing (hereinafter the “Board”) is empowered by Idaho Code § 54-1404 to regulate the practice of nursing in the State of Idaho.

2.

Christine L. Pate (hereinafter “Respondent”) is licensed to engage in the practice of nursing by the Idaho State Board of Nursing under License No. PN-11756.

3.

On or about June 6, 2005, the Board received a Report of violation of the Nursing Practice Act from Gooding County Memorial Hospital, setting forth information that Respondent had exceeded the scope of her practice and had been grossly negligent or reckless in performing nursing functions. On April 14, 2005, Respondent failed to start a chart for a patient who presented at the Emergency Department, failed to document care rendered, failed to document or even take vital signs, failed to notify a physician or to obtain orders for medication she mixed, administered, and sent home with the patient. The incident was reported to Respondent’s former employer by the patient. The CNA ward clerk who was present with Respondent confirmed the incident had occurred as

COMPLAINT - 1
reported by the patient. Respondent denied the incident occurred when questioned by the former employer.

4.

On June 17, 2005, a Board staff member spoke with Respondent by telephone about the information in the Report of Violation. She acknowledged she had denied the incident to her former employer but that she later remembered that it did occur. She stated she did not open a chart, as the patient stated he did not want to see a physician and she did not want the patient to incur any charges for the visit. She also admitted she administered an antacid, but denied she had mixed a ‘GI’ cocktail. The patient was instructed to go to the VAH in Boise the next day.

5.

The patient drove to the VAH in Boise after leaving Gooding County Memorial Hospital. Upon evaluation at the VAH, the patient was sent to St. Alphonsus where he underwent emergency cardiac surgery.

6.

Respondent’s conduct as set forth above if proven constitutes grounds for discipline as follows:

a. For violations of Idaho Code Section 54-1413(1)(d) and IDAPA 23.01.01.100.05—has been grossly negligent or reckless in performing nursing functions;

b. For violations of Idaho Code § 54-1413 (1)(g) and IDAPA 23.01.01.100.08 and 23.01.01.101.01—Violates the law, or rules and standards of conduct and practice as may be adopted by the board;

c. For violations of Idaho Code Section 54-1413 (1)(h) and IDAPA 23.01.01.100.09—Conduct to deceive, defraud or endanger patients or the public;

d. For violation of IDAPA 23.01.01.101.04.c—shall function within the defined legal scope of nursing practice;

COMPLAINT - 2
e. For violations of IDAPA 23.01.01.101.04.e- shall not obtain, possess, furnish or administer prescription drugs to any person, including self, except as directed by a person authorized by law to prescribe drugs;

f. For violations of IDAPA 23.01.01.101.04.i-shall observe the conditions and signs and symptoms of a patient, record the information, and report the appropriate person any significant changes;

g. For violations of IDAPA 23.01.01.101.04.j-shall function as a member of the health team and shall collaborate with other health team members as necessary to meet the patient’s health needs;

h. For violations of IDAPA 23.01.01.101.05.c-shall be responsible and accountable for his nursing judgments, actions and competence; and

i. For violations of IDAPA 23.01.01.101.05.e- shall make or keep accurate, intelligible entries into records required by law, employment or customary practice.

7.

Pursuant to Idaho Code § 54-1413, the Board is authorized to enter an order suspending, revoking or otherwise disciplining Respondent’s license for Respondent’s violations of Idaho Code and the Board’s duly promulgated rules, as set forth above.

WHEREFORE, the Idaho State Board of Nursing prays for the following action:

1. That a hearing commence at a designated time to allow evidence on the allegations contained in the Complaint to be presented before the Board or the Board’s designated hearing officer;

2. That subsequent to taking evidence, the waiver of a hearing, or the failure of the Respondent to file an Answer to this administrative Complaint, that the Board, or its designated hearing officer, shall issue findings of fact and conclusions of law finding the violations of law alleged herein and the Board shall determine whether the license of Respondent Christine L. Pate should be suspended, revoked or otherwise disciplined pursuant to the statutory and regulatory authority of the Board of Nursing; and

COMPLAINT - 3
3. For such other and further relief as the Board deems just and proper in the circumstances.

DATED this 12th day of August, 2005.

IDAHO STATE BOARD OF NURSING

By __________________________
Sandra Evans, M.A.Ed., R.N.
Executive Director

NOTIFICATION OF PROCEDURAL RIGHTS

Pursuant to the provisions of the Administrative Procedure Act codified at title 67, chapter 52, Idaho Code, and the Idaho Rules of the Administrative Procedure of the Attorney General, promulgated at IDAPA 04.11.01, if you wish to contest the charges set forth in this Complaint, you must: (1) file with the Idaho State Board of Nursing a verified Answer to the allegations contained herein within twenty-one (21) days after you are served with this Complaint and (2) request an evidentiary hearing on the charges. You are further notified that if you fail to answer and/or request a hearing, the Board may enter a default against you and be granted the relief sought in this Complaint. Upon receipt of your Answer and request for hearing, the matter will be reviewed and a hearing scheduled. You will then be notified of the date, time and place of the hearing, the name of the hearing officer appointed by the Board (if any) and further notification of your procedural rights and responsibilities.

You also have the right to be represented by legal counsel, at your own expense, during this administrative proceeding.

Copies of the Administrative Procedure Act and the Idaho Rules of the Administrative Procedure of the Attorney General may be obtained at the Idaho State Law Library.

All original official documents must be filed with the Board at the following address:

COMPLAINT - 4
Idaho State Board of Nursing  
280 N. Eighth Street, Suite 210  
P.O. Box 83720  
Boise, ID  83720-0061  
telephone:  (208) 334-3110  
facsimile:  (208) 334-3262

A copy of the Answer and every pleading, motion or subsequent document filed with the Board must also be served upon legal counsel for the Board at the following address:

Cheri L. Bush  
Deputy Attorney General  
Civil Litigation Division  
P.O. Box 83720  
Boise, ID  83720-0010
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 12th day of August, 2005, I caused to be served a true and correct copy of the foregoing COMPLAINT addressed as follows:

Cheri L. Bush
Deputy Attorney General
P.O. Box 83720
Boise, ID 83720-0010

☐ U.S. Mail
☐ Hand Delivery
☐ Certified Mail, Return Receipt Requested
☐ Overnight Mail
☐ Facsimile:
☒ Statehouse Mail

Christine L. Pate
823 Nevada Street
Gooding, ID 83330

☒ U.S. Mail
☐ Hand Delivery
☐ Certified Mail, Return Receipt Requested
☐ Overnight Mail
☐ Facsimile:
☐ Statehouse Mail

Sandra Evans, M.A.Ed., R.N.
Executive Director
Board of Nursing

COMPLAINT - 6
CHRISTINE L PATE
823 NEVADA ST
GOODING ID 83330
Dear Idaho State Board of Nursing,

I am responding to the Notice of Intent to take Default and wish to give Answer to this claim. As noted, I spoke with a Board Member on June 17, 2005 and acknowledged my violations of codes of practice at that time. I would like to take you through the events of the night in question.

At 2:00 am a male, approximately 50 years in age, came in to the Emergency Room complaining of heartburn and pain in his stomach. He made it clear that it was his wife who prompted him to come in and that he did not want to be seen. He said that he had been having this pain for 20 years and was being followed by a doctor at the VA in Boise who was unable to determine the cause of his pain. He was markedly agitated and said that he was frustrated with his doctors at the VA. I asked him to come into the Emergency Room and to lie on the gurney and begin the checking in process. He refused. We talked for several minutes in the hallway. I tried to get him to come in and lie down - I said I would call our P.A. on duty but he didn't want me to do that. He complained of incurring more medical charges and that they wouldn't be able to find the problem anyway. My visual assessment showed this man not to be in acute distress, good color, no diaphoresis, no guarding of his abdomen, standing upright and at ease with no facial grimacing. He was angry and uncooperative. I asked him what he usually does to alleviate the pain and he said that he uses Mylanta and Tylenol on a daily basis - usually with good results. He said that he had not used antacids that day and because it was 2:00 am in our rural community, the stores were closed. My poor
judgement came into play at this point. I sympathized with this man. He appeared in no distress—by his own history this was a long-standing condition that he was being followed for through the VA. The pain was not any better or worse than any other day and that his wife insisted he come to Bozeman at his reluctance. He admitted that he regretted making the drive to Bozeman and should have driven to Boise instead. He said he wanted to leave and go to the VA in the morning—I asked him to promise me that he would. I felt his condition needed further medical evaluation but was not life-threatening at that point and neither did he. Because he had not used any antacids that day, my heart went out to him and I wanted to make him more comfortable for his long drive home. I offered him a “fancy antacid” in the form of a “91 cocktail” that consisted of over-the-counter medications—not narcotics or prescription medications. He agreed to that thinking it would help his discomfort. It did. He said he felt much better, the pain had subsided. I chose to give him a little more in a paper cup for his hour-long drive home—possibly 2 hours if he chose to go directly to Boise from Bozeman. They were grateful for my help—thanked me for being so nice and caring and they both hugged me before leaving the Emergency Room.

I am sorely aware of my mistakes. If I could go back in time and change my decisions I would do so—my only solace in this awful chain of events is that this man is alive to tell his story. I don’t feel my actions would have changed this man’s outcome—he would have needed surgery anyway and he refused care in Bozeman. I should have not given him an antacid and should have
documented these events. I will live with these mistakes for the rest of my life.

I would respectfully ask the Board of Nursing not to revoke or suspend my license. I have suffered greatly in the 4 months since I was fired from my job. I wasn't able to find work - have been trying to make ends meet while on unemployment and I'm facing a bankruptcy. Last week I was hired at a Long Term care facility. I was honest about the mistakes that I had made in Gooding and they hired me anyway. I am pleading for the chance to rebuild my life and to learn from my mistakes. I am a good nurse and only want to work in the profession that I feel called to do. I started at 16 years old as a nurses aid - graduated from High School - joined the Navy as a Hospital Corpsman for 8 years - got married - raised 2 wonderful children - went to nursing school later in life - successfully completed a Surgical Technician and LPN program - worked as a surgical nurse for 6 years in Jerome - came to Gooding Hospital to work closer to home for 1 year. My evaluations have always been above average, my rapport with patients noteworthy and I have always gotten along well with co-workers. I am sick in my heart to think that my poor decisions on that fateful night could take away a career that I love forever. Please know that I am remorseful, want to learn from my mistakes and become a better nurse for it. Thank you for the opportunity of hearing my story.

Sincerely,

Christine L Pate

License # PN 11756

Case # Bon 05-084
BEFORE THE IDAHO STATE BOARD OF NURSING

STATE OF IDAHO

In the Matter of the License of:  ) Case No. BON 05-054
CHRISTINE L. PATE ) NOTICE OF INTENT TO TAKE
License No. PN-11756 ) DEFAULT
Respondent.

The Idaho State Board of Nursing (hereinafter the "Board") received information from Gooding County Memorial Hospital that Christine L. Pate (hereinafter Respondent) had exceeded the scope of her practice and had been grossly negligent or reckless in performing her nursing duties. On April 14, 2005, Respondent failed to start a chart for a patient who presented at the Emergency Department, failed to document care rendered, failed to take vital signs, failed to notify a physician or to obtain orders for medication she mixed, administered, and sent home with the patient. When Respondent was contacted by Board staff about the incident she stated she did not open a chart, as the patient stated he did not want to see a physician and she did not want the patient to incur any charges for the visit. She also admitted she administered an antacid, but denied she had mixed a ‘GI’ cocktail. The patient was instructed to go to the VAH in Boise the next day. Respondent’s actions are in violation of Idaho Code 54-1413 (1)(d), (g) and (h); IDAPA 23.01.01.100.05, .08 and .09; 23.01.01.101.01, .04.e, .f, .i, and .j; and, 23.01.01.101.05.c and e.

On August 12, 2005 the Board filed the formal Complaint against Respondent. The Complaint was sent to Respondent at her last address of record. The United States Post Office has not returned the Complaint marked as undeliverable. The Complaint advised Respondent that if she did not timely answer the Complaint or otherwise defend, default would be sought

NOTICE OF INTENT TO TAKE DEFAULT - 1
against her. Respondent's Answer was due no later than September 2, 2005. Default is appropriate pursuant to I.C. Section 67-5242.

THIS IS NOTICE OF THE INTENT TO TAKE DEFAULT AGAINST RESPONDENT AT THE NEXT REGULARLY SCHEDULED BOARD MEETING ON NOVEMBER 10, 2005. THIS IS TO FURTHER ADVISE RESPONDENT THE DEFAULT SOUGHT WILL BE INDEFINATE SUSPENSION OR REVOCATION OF LICENSE PN-11756.

Respondent should contact the Board in writing via:

Judith Nagel MSN, RN
Associate Director
P.O. Box 83720
Boise, ID 83720-0061
Fax (208) 334-3262

Respondent must also send a copy of any written contact to:

Cheri L. Bush, D.A.G.
Office of the Attorney General
Civil Litigation
P.O. Box 83720
Boise, ID 83720-0010
Fax: (208) 334-2830

DATED this 14th day of September, 2005.

Sandra Evans, Executive Director
BOARD OF NURSING
CERTIFICATE OF SERVICE

I certify that on this 14th day of September, 2005, I caused to be served a true and correct copy of the foregoing NOTICE OF INTENT TO TAKE DEFAULT addressed as follows:

Christine L. Pate
823 Nevada St.
Gooding, ID 83330

X U.S. Mail, postage prepaid
X Certified U.S. Mail, return receipt
Hand Delivery
Overnight Mail
Facsimile:
Statehouse Mail

Cheri L. Bush
Deputy Attorney General
P.O. Box 83720
Boise, ID 83720-0010

U.S. Mail, postage prepaid
Certified U.S. Mail, return receipt
Hand Delivery
Overnight Mail
Facsimile:
Statehouse Mail

Sandra Evans
Executive Director
Board of Pharmacy
<table>
<thead>
<tr>
<th>SENDER: COMPLETE THIS SECTION</th>
<th>COMPLETE THIS SECTION ON DELIVERY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.</td>
<td>A. Received by (Please Print clearly) 9-15-05</td>
</tr>
<tr>
<td>Print your name and address on the reverse so that we can return the card to you.</td>
<td>B. Date of Delivery</td>
</tr>
<tr>
<td>Attach this card to the back of the package, or on the front if space permits.</td>
<td>C. Signature</td>
</tr>
</tbody>
</table>

1. Article Addressed to:

CHRISTINE L PATE
823 NEVADA STREET
GOODING ID 83330

| D. Is delivery address different from item 17? | Yes |
| If YES, enter delivery address below: | No |

'05 SEP 19 9:58

2. Article Number (Copy from service label)

7103 0038 0003 1849 8765

PS Form 3611, July 1999
Domestic Return Receipt

3. Service Type

☑ Certified Mail
☑ Express Mail
☐ Registered
☐ Return Receipt for Merchandise
☐ Insured Mail
☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage $ |
Certified Fee |
Return Receipt Fee (Endorsement Required) |
Restricted Delivery Fee (Endorsement Required) |

CHRISTINE L PATE
823 NEVADA STREET
GOODING ID 83330

PS Form 3600, June 2002

Notice of Default
914/25 from

See reverse for Instructions
BEFORE THE IDAHO STATE BOARD OF NURSING

In the Matter of the License of:

CHRISTINE L. PATE
License No. PN-11756
Respondent.

Case No. 05-054

WITNESS AND EXHIBIT LIST

Comes now the prosecuting attorney for the Idaho State Board of Nursing and discloses
the witnesses who will be called to testify at hearing and the exhibits that will be offered as
documentary evidence at hearing in the above-entitled matter.

WITNESSES:

1. Chanel Johnson
   Investigator for the Board
   P.O. Box 83720
   Boise, ID 83720-0061

2. Lorraine Reinhart
   Gooding County Memorial Hospital
   P.O. Box 418
   Gooding, ID 83330

3. Christine L. Pate
   823 Nevada Street
   Gooding, ID 83330

EXHIBITS:

1. Report of Violation;
2. Complaint; and
3. Response to Notice of Intent/Answer.

DATED this 25th day of October, 2005.

STATE OF IDAHO
OFFICE OF THE ATTORNEY GENERAL

By: CHERI L. BUSH
Deputy Attorney General

WITNESS AND EXHIBIT LIST - 1
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of October, 2005, I caused to be served a true and correct copy of the foregoing WITNESS AND EXHIBIT LIST addressed as follows:

Christine L. Pate  
823 Nevada Street  
Gooding, ID 83330

Sandra Evans  
Executive Director  
Idaho State Board of Nursing (w/o attachments)

X U.S. Mail, postage prepaid
___ Certified U.S. Mail, return receipt
___ Hand Delivery
___ Overnight Mail
___ Facsimile: ________________
___ Statehouse Mail

Cheri L. Bush  
Office of the Attorney General
BEFORE THE IDAHO STATE BOARD OF NURSING

In the Matter of the License of: Case No. 05-054
CHRISTINE L. PATE Notice of Hearing
License No. PN-11756
Respondent.

To: Christine L. Pate
823 Nevada Street
Gooding, ID 83330

Pursuant to the provisions of title 54, chapter 14, Idaho Code, and the duly promulgated rules of the Idaho State Board of Nursing, you are hereby notified and requested to appear before the Board on the 10th day of November, 2005, at 11:30 a.m. (MST) at the Statehouse Inn, 981 Grove Street, Showcase Room, in Boise, ID and from time to time thereafter as may be required by the Board, on whether or not your license should be disciplined as set forth in the Complaint filed against you.

You are further notified that you may appear with or without the assistance of an attorney on the day, time and place specified in this Notice of Hearing and present testimony with respect to the above noted issues.

All persons requiring assistance pursuant to the Americans with Disabilities Act in order to participate in or understand the hearing must request such assistance ten (10) days in advance of the hearing by contacting the Board Office at the number or address listed below.

The hearing will be conducted pursuant to the Administrative Procedure Act codified at title 67, chapter 52, Idaho Code, and the Idaho Rules of Administrative Procedure of the Attorney General, promulgated at IDAPA 04.11.01. Copies of the

NOTICE OF HEARING - 1
Administrative Procedure Act and the Idaho Rules of Administrative Procedure of the Attorney General may be obtained at the Idaho State Law Library.

All original official documents must be filed with the Idaho State Board of Nursing, 280 North 8th Street, Suite 210, Boise, ID 83720-0061; telephone (208) 334-3110; FAX (208) 334-3262 no later than October 31, 2005 at 5:00 p.m. And a copy must be sent to:

Cheri L. Bush  
Deputy Attorney General  
Civil Litigation Division  
P.O. Box 83720  
Boise, ID 83720-0010

DATED this 24th day of OCTOBER, 2005.

IDAHO STATE BOARD OF NURSING

By ________________________________
SANDRA EVANS, M.A.Ed., R.N.  
Executive Director
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24TH day of OCTOBER, 2005 I caused to be served a true and correct copy of the foregoing NOTICE OF HEARING addressed as follows:

Cheri L. Bush
Deputy Attorney General
P.O. Box 83720
Boise, ID 83720-0010

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Christine L. Pate
823 Nevada Street
Gooding, ID 83330

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Sandra Evans, M.A.Ed., R.N.
Executive Director
Board of Nursing
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