



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. Johnson*  
Executive Director of the Board

BEFORE THE TEXAS BOARD OF NURSING

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In the Matter of §  
Vocational Nurse License Number 122023 §  
issued to ZOE ANN BROWN §

ORDER OF THE BOARD

On this day the Texas Board of Nursing, hereinafter referred to as the Board, considered the matter of ZOE ANN BROWN, Vocational Nurse License Number 122023, hereinafter referred to as Respondent.

This action was taken in accordance with Section 301.453(c), Texas Occupations Code.

Respondent waived notice and hearing and agreed to the entry of this Order.

The Board makes the following Findings of Fact and Conclusions of Law.

FINDINGS OF FACT

1. Respondent's license to practice as a vocational nurse in the State of Texas is in current status.
2. Respondent waived notice and hearing, and agreed to the entry of this Order.
3. Respondent received a Certificate in Nursing from Victoria College-Gonzales, Gonzales, Texas on August 22, 1988. Respondent was licensed to practice vocational nursing in the State of Texas on December 8, 1988.
4. Respondent's nursing employment history includes:
 

02/88 - 12/90	Unknown	
01/91 - 01/00	LVN	Valley Baptist Medical Center Harlingen, Texas

Respondent's nursing employment history continued:

01/99 - 10/11	LVN	Continental Automotive Seguin, Texas
11/11 - 06/16	Unknown	
07/16 - 09/16	LVN	Colonial Manor Care Center New Braunfels, Texas

5. On or about September 11, 2016, while employed as a Licensed Vocational Nurse with Colonial Manor Care Center, New Braunfels, Texas, Respondent verbally abused Patient BG, in that she was witnessed cursing at said patient and subsequently, caused the to patient cry. Respondent's conduct was likely to cause emotional, physical, and/or psychological harm to the patient and could have interfered or disrupted this patient's treatment.
6. Formal Charges were filed on October 13, 2017.
7. Formal Charges were mailed to Respondent on October 18, 2017.
8. On February 12, 2018, the Board received a notarized statement from Respondent voluntarily surrendering the right to practice nursing in Texas. A copy of Respondent's statement, dated February 10, 2018, is attached and incorporated herein by reference as part of this Order.

#### CONCLUSIONS OF LAW

1. Pursuant to Texas Occupations Code, Sections 301.451-301.555 , the Board has jurisdiction over this matter.
2. Notice was served in accordance with law.
3. The evidence received is sufficient to prove violation(s) of 22 TEX. ADMIN. CODE §217.11(1)(A)&(1)(B) and 22 TEX. ADMIN. CODE §217.12(1)(A),(1)(B),(4),(6)(C)&(6)(F).
4. The evidence received is sufficient cause pursuant to Section 301.452(b)(10)&(13), Texas Occupations Code, to take disciplinary action against Vocational Nurse License Number 122023, heretofore issued to ZOE ANN BROWN, including revocation of Respondent's license(s) to practice nursing in the State of Texas.
5. Under Section 301.453(c), Texas Occupations Code, the Board has the authority to accept the voluntary surrender of a license.

6. Under Section 301.453(d), Texas Occupations Code, as amended, the Board may impose conditions for reinstatement of licensure.
7. Any subsequent reinstatement of this license will be controlled by Section 301.453(d), Texas Occupations Code, and 22 TEX. ADMIN. CODE §213.26-.29, and any amendments thereof in effect at the time of the reinstatement.

**TERMS OF ORDER**

NOW, THEREFORE, IT IS ORDERED that the **VOLUNTARY SURRENDER** of Vocational Nurse License Number 122023, heretofore issued to ZOE ANN BROWN, to practice nursing in the State of Texas, is accepted by the Executive Director on behalf of the Texas Board of Nursing. In connection with this acceptance, the Board imposes the following conditions:

1. RESPONDENT SHALL NOT practice vocational nursing, use the title "vocational nurse" or the abbreviation "LVN" or wear any insignia identifying herself/himself as a vocational nurse, or use any designation which, directly or indirectly, would lead any person to believe that RESPONDENT is a vocational nurse during the period in which the license is surrendered.
2. RESPONDENT SHALL NOT petition for reinstatement of licensure until at least one (1) year has elapsed from the date of this Order.
3. Upon petitioning for reinstatement, RESPONDENT SHALL satisfy all then existing requirements for relicensure.

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

Effective this 10th day of February, 2018.

TEXAS BOARD OF NURSING



By: \_\_\_\_\_

Katherine A. Thomas, MN, RN, FAAN  
Executive Director on behalf  
of said Board

ZOE ANN BROWN  
124 Rosemary Loop  
LVN LICENSE NUMBER 122023

Voluntary Surrender Statement

Dear Texas Board of Nursing:

I no longer desire to be licensed as a nurse. Accordingly, I voluntarily surrender my license(s) to practice nursing in the State of Texas. I waive representation by counsel and consent to the entry of an Order which outlines requirements for reinstatement of my license. I understand that I may not petition for reinstatement until one (1) year from the effective date of the Order. I understand that I will be required to comply with the Board's Rules and Regulations in effect at the time I submit any petition for reinstatement.

Signature: Zoe A. Brown  
Date: 2-10-18

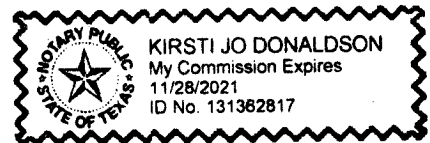
LVN LICENSE NUMBER 122023

The State of Texas COMAL COUNTY

Before me, the undersigned authority, on this date personally appeared ZOE ANN BROWN 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 before me the 10th day of February, 2018.

SEAL



Kirsti Jo Donaldson  
Notary Public in and for the State of TEXAS