

BEFORE THE INDIANA STATE
BOARD OF NURSING
CAUSE NO.: 98 NB 050

STATE OF INDIANA,

Petitioner,

v.

RITA A. NUNN, R.N.,
License Number 28117507,

Respondent.

FILED

FEB 17 1999

HEALTH PROFESSIONS
BUREAU

PETITION FOR SUMMARY SUSPENSION

The State of Indiana ("Petitioner"), by counsel, Jeffrey A. Modisett, Attorney General of Indiana, by William T. Niemier, Deputy Attorney General, moves the Indiana State Board of Nursing ("Board") to suspend the license of Rita A. Nunn, R.N. ("Respondent") for 90 days, and in support of its Petition, states as follows:

1. Respondent is a registered nurse in the State of Indiana.
2. This Board has jurisdiction to summarily suspend the license of Respondent in accordance with the provisions of the Indiana Code § 4-21.5-4-3 *et seq.* and Indiana Code § 25-1-9-10.
3. If allowed to continue to practice as a registered nurse, Respondent represents a clear and immediate danger to the public health and safety for the following reasons:

3.1 Respondent has continued to practice although she has become unfit to practice due to professional incompetence and/or failure to keep abreast of current professional theory or practice;

3.2 Respondent has engaged in fraud or material deception in the course of professional services or activities; and

3.3 Respondent has knowingly violated a state statute or rule, or federal statute or regulation, regulating the

profession in question, to-wit: 848 IAC 2-2-3(1), by using unsafe judgment, technical skills, or inappropriate interpersonal behaviors in providing nursing care and 848 IAC 2-2-3(2), by performing any nursing technique or procedure for which she was unprepared by education or experience.

WHEREFORE, the State of Indiana requests that this Board set a hearing on this petition and suspend Respondent's nursing license for 90 days and for all other proper relief.

Respectfully Submitted,

JEFFREY A. MODISSETT
Attorney General of Indiana



William T. Niemier
Attorney No. 15518-49

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Objection To Continuance has been duly served upon Respondent's counsel, Roger P. Ralph, RICOS BIPPUS & RALPH, 1213 N. Arlington Avenue, Suite 205, Indianapolis, IN 46219, by United States Mail, First-Class postage prepaid and by fax at (317) 351-7232, on this 16th day of February, 1999.

By:


William T. Niemier

Office of the Attorney General
Indiana Government Center South
402 West Washington Street, Fifth Floor
Indianapolis, Indiana 46204-2770
Telephone No.: (317) 232-6224
WTN:15360