

BEFORE THE INDIANA STATE BOARD  
OF NURSING  
CAUSE NO.: 2012 NB 408

IN THE MATTER OF THE LICENSE OF )  
 )  
GEWANA CHANTEL STRINGER, L.P.N. )  
 )  
LICENSE NO: 27053143 (Active) )



**COMPLAINT**

This complaint is brought against the Licensed Practical Nurse (“L.P.N.”) license of GeWana Chantel Stringer, L.P.N. (“Respondent”), by the Office of the Indiana Attorney General, by counsel, Deputy Attorney General, Jason J. Gross, on behalf of the State of Indiana (“Petitioner”) and pursuant to Ind. Code § 25-1-7-7, Ind. Code § 25-1-5-3, Ind. Code § 25-22.5-2-7 *et seq.*, the Administrative Orders and Procedures Act, and Ind. Code ch.25-1-9-1 and in support alleges and states:

**FACTS**

1. Respondent’s address on file with the Indiana State Board of Nursing (“Board”) is PO Box 1441, Jeffersonville, Indiana 47131.
2. Respondent is a L.P.N. in the State of Indiana holding license number 27053143 (Active).
3. Respondent held an active L.P.N. Certificate number 64389 in the State of North Carolina.
4. On or about March 26, 2009, Respondent renewed her North Carolina nursing license.
5. Respondent admitted in her North Carolina license renewal documentation that she had not completed her continuing competency requirements.

6. On or about July 22, 2009, Respondent was sent a letter notifying her that she had sixty (60) days to provide sufficient documentation to demonstrate compliance with the continuing competence requirements. The letter was returned to the North Carolina Board of Nursing ("NC Board") marked "unclaimed – unable to forward."

7. On or about October 1, 2009, a final notice was sent to Respondent by regular mail notifying her that if evidence of compliance with the continuing competence requirements was not received within ten (10) days, then her file would be sent to the Discipline Department. This letter did not return.

8. On or about December 15, 2009, Respondent was sent a Consent Agreement in an attempt to resolve the matter. Respondent was offered the option of accepting a reprimand, completing an online Legal Scope of Practice Course, and submitting evidence of compliance with the continuing competence requirements. The letter was returned to the NC Board on or about December 30, 2009, marked "unable to forward."

9. On or about January 11, 2010, the Consent Agreement was re-sent to Respondent. The letter was returned to the NC Board, marked "moved – left no address."

10. On January 7, 2010, February 7, 2010, and February 14, 2010, Notice of Service by Process of Publication was published in the Charlotte Observer notifying Respondent that a hearing would be held on March 26, 2010 at 8:15 a.m. to determine if her license to practice nursing in North Carolina should be revoked.

11. The Administrative Law Counsel ruled that through due diligence, the licensee could not be personally served, and that therefore appropriate notice of the hearing had been given and the hearing could proceed.

12. The NC Board found Respondent to have been in violation of North Carolina General Statute 90-171.23(b)(23) in that she was required to provide evidence of continuing competence in the practice of nursing at the time of licensure renewal or reinstatement and failed to do so.

13. The NC Board also found Respondent to have been in willful violation of Regulation 21 North Carolina Admin. Code 36.0217(c)(15) in that she did fail to file a report, or filed a false report required by law or by the Board, or impeded or obstructed such filing or induced another to do so.

14. The NC Board further found Respondent to have been in willful violation of Regulation 21 North Carolina Admin. Code 36.0232(g) in that she failed to meet the requirements of the continuing competence rule.

15. On or around May 12, 2010, due to the above conclusions of law, the NC Board suspended Respondent's L.P.N. license.

16. On or about October 28, 2010, Respondent applied for the renewal of her Indiana L.P.N. license. In her application, she failed to disclose the North Carolina discipline.

#### COUNT I

17. Paragraphs 1 through 16 are incorporated herein.

18. Respondent's conduct as described above violates Ind. Code § 25-1-9-4(a)(7) in that Respondent has had disciplinary action taken against her license, as evidenced by the North Carolina Board having found Respondent in willful violation of 21 North Carolina Admin. Code 36.0217(c)(15) and 21 North Carolina Admin. Code 36.0232(g) and thereby suspending Respondent's North Carolina nursing license.

**WHEREFORE**, Petitioner demands an order against the Respondent that:

1. Imposes the appropriate disciplinary sanction;
2. Directs Respondent to immediately pay all costs incurred in the prosecution of this case;
3. Directs Respondent to pay a fee of Five Dollars (\$5.00) to be deposited into the Health Records and Personal Identifying Information Protection Trust Fund pursuant to Ind. Code § 4-6-14-10(b); and,
4. Provides any further relief as the Board deems just and proper.

Respectfully submitted,

GREGORY F. ZOELLER  
Attorney General of Indiana  
Atty. No.: 1958-98

By: 

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**CERTIFICATE OF SERVICE**

I hereby certify this 28<sup>th</sup> day of September, 2012 that a true and correct copy of the foregoing "Complaint" has been served upon the below-listed person, via first Class U.S. Mail, postage prepaid.

GeWana Chantel Stringer  
PO Box 1441  
Jeffersonville, IN 47131



Jason Gross  
Deputy Attorney General  
Attorney No.: 23587-49