



I do hereby certify the foregoing to be a true and certified copy of the document on file with the Massachusetts Board of Registration in Nursing.

CM CM 7/15/15

Authorized Signature Date

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK COUNTY

BOARD OF REGISTRATION
IN NURSING

In the Matter of
Raymond Chase
License No. LN67793
Exp. 11/27/15

Docket No. NUR-2014-0014

CONSENT AGREEMENT FOR REPRIMAND

The Massachusetts Board of Registration in Nursing (Board) and Raymond Chase (Licensee), a Licensed Practical Nurse (LPN) licensed by the Board, License No. LN67793, do hereby stipulate and agree that the following information shall be entered into and become a permanent part of the Licensee's record maintained by the Board:

1. The Licensee acknowledges that a complaint has been filed with the Board against his Massachusetts Licensed Practical Nurse (LPN) license (license¹), identified as Docket No. NUR-2014-0014 (Complaint).
2. The Licensee admits that while employed as a Licensed Practical Nurse and while on duty as a nursing supervisor at Lowell Health Care Center in Lowell, MA, on or about September 14, 2013, he yelled and swore at a patient. On or about April 30, 2013, while employed at Colonial Heights Care and Rehabilitation Center in Lawrence, MA, Licensee removed patients' discontinued Lisinopril from the facility. The Licensee acknowledges that his conduct constitutes failure to comply with the Board's Standards of Conduct at 244 Code of Massachusetts Regulations (CMR) 9.03(5), (6)(a), (15), (17), (24), (37), (47) and warrants disciplinary action by the Board under Massachusetts General Laws (G.L.) Chapter 112, section 61 and Board regulations at 244 CMR 7.04, Disciplinary Actions.

¹ The term "license" applies to both a current license and the right to renew an expired license.

3. The Board agrees that in return for the Licensee's execution of this Agreement it will not prosecute the complaint.
4. The Licensee understands that he has a right to formal adjudicatory hearing concerning the allegations against him and that during said adjudication he would possess the right to confront and cross-examine witnesses, to call witnesses, to present evidence, to testify on his own behalf, to contest the allegations, to present oral argument, to appeal to the courts, and all other rights as set forth in the Massachusetts Administrative Procedures Act, G. L. c. 30A, and the Standard Adjudicatory Rules of Practice and Procedure, 801 CMR 1.01 *et seq.* The Licensee further understands that by executing this Agreement he is knowingly and voluntarily waiving his right to a formal adjudication of the complaints.
5. The Licensee acknowledges that he has been at all times free to seek and use legal counsel in connection with the complaint and this Agreement.
6. The Licensee acknowledges that after the Effective Date, the Agreement constitutes a public record of disciplinary action by the Board. The Board may forward a copy of this Agreement to other licensing boards, law enforcement entities, and other individuals or entities as required or permitted by law.
7. The Licensee certifies that he has read this Agreement. The Licensee understands and agrees that entering into this Agreement is a final act and not subject to reconsideration, appeal or judicial review.

Raymond Chase 6/30/15

Raymond Chase (sign and date)

James Adusep
 Witness (print name)
 PARALEGAL

GARY HORLWITZ ESQUIRE

Webster Adly 6/30/15
 Witness (sign and date)

Amy Fein
 Rula Harb, MSN, RN Amy Fein RN, BSN, JD
 Executive Director Board Authorized Signatory
 Board of Registration in Nursing

July 8, 2015
Effective Date of Agreement

Fully Signed Agreement Sent to Licensee on 7/15/15 by Certified

Mail No. 7012 0470 0001 3526 5A9