

IN THE CRIMINAL COURT FOR DAVIDSON COUNTY, TENNESSEE  
DIVISION IV

STATE OF TENNESSEE

VS.

**RADONDA L. VAUGHT.**

)  
)  
)  
)  
)  
)

CASE NO: **2019-A-76**

2019 MAR 27 PM 3:20  
FILED  
CLERK OF COURT  
DAVIDSON COUNTY, TENN.

**STATE'S RESPONSE TO REQUEST FOR DISCOVERY**

The Office of the District Attorney General, prosecuting on behalf of the State of Tennessee, submits the following response to the request for discovery:

1. Pursuant to Rule 16(a)(1)(A) and (B), Tennessee Rules of Criminal Procedure, copies of any relevant written or recorded statement or the substance of any oral statements made by defendant and intended by the State to be used as evidence in its case-in-chief and made by the defendant or co-defendant(s) before or after arrest in response to interrogation by any person then known by the defendant to be a law enforcement officer are as follows: **Summary of Defendant's interview with the Tennessee Bureau of Investigation. Full audio recording will be furnished on a portable electronic storage device provided by the defense. Signed TBI Warnings as to Constitutional Rights attached.**

2. Pursuant to Rule 16(a)(1)(E) Tenn.R.Crim.P., the defendant's (or defendants') prior criminal record is as follows: **None known.**

Should the defendant testify at trial, the State intends to use the prior criminal record during cross-examination for impeachment and enhancement purposes pursuant to *State v. Morgan*, 541 S.W.2d 385, Tennessee Rules of Evidence, 609 and 405, and T.C.A. § 40-35-202.

3. Tangible objects and documents subject to discovery pursuant to Rule 16(a)(1)(F), Tenn.R.Crim.P., and which the State intends to introduce in its case-in-chief, will be made available for inspection and/or copying upon appointment and are listed as follows: **TBI Request for Examination Report regarding plastic bag containing one vial of Vecuronium Bromide, two syringes, one large alcohol prep pad. Termination letter from Vanderbilt University Medical Center, dated January 3, 2018. Summary of events regarding medication pulled by override function from Acudose dispenser. All other documents, voluminous in nature and contained within the State's possession at this time, will be provided on the electronic storage device provided by the defense.**

4. Results or reports of physical or mental examinations or of any scientific tests or experiments, known by the undersigned counsel to be within the possession, custody or control of the State and which are material to the preparation of the defense or intended for use by the State as evidence in chief at trial will be made available for inspection and/or copying upon request for appointment, and are listed as follows: **Vial of Vecuronium Bromide has been sent for further testing. Report to be provided upon receipt. Medical records of the victim are available for inspection upon appointment.**

5. Witnesses in addition to those listed on the back of the indictment whom the State intends to call to testify at trial are: **None known at this time.**

6. The offense occurred **on the 26<sup>th</sup> day of December, 2017 at Vanderbilt University Medical Center, in Davidson County, Tennessee.**

7. In the event the State intends to offer "eyewitness identification testimony" and the witness has previously been asked to make a pre-trial, extrajudicial identification of the defendant, the following information is provided: **None known at this time.**

8. In accordance with the decision in *Brady v. Maryland*, 373 U.S. 83 (1963), all items of exculpatory nature, if any there be, will be furnished to defense counsel if and when any such item or information becomes known to the State. **None known at this time.**

**In addition to this written response, and its attached materials, this Office is further providing "open-file discovery." Upon request and appointment, defense counsel may inspect and review the State's case file.**

Defense counsel may assume that any specific request which is not answered is either not discoverable or the information requested is not available. The State cannot provide evidence material to the defense or exculpatory to the defendant until such is made known to the State.

This response is based upon information available to the State at this time. If any additional information becomes known to the State, it will be promptly provided to defense counsel.

Respectfully submitted,



**Chadwick Jackson**

Tenn. Sup. Ct. Reg. #023711  
Assistant District Attorney General  
Washington Square, Suite 500  
222 Second Avenue North  
Nashville, TN 37201-1649  
(615) 862-5500



**Brittani Flatt**

Tenn. Sup. Ct. Reg. #031470  
Assistant District Attorney General  
Washington Square, Suite 500  
222 Second Avenue North  
Nashville, TN 37201-1649  
(615) 862-5500

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing has been mailed Peter Strianse, Attorney for Defendant, Tune, Entrekin & White, P.C., 315 Deaderick Street, Suite 1700, Nashville, Tennessee 37238, on this the 27<sup>th</sup> day of March, 2019.

Buttani Platt

**TENNESSEE BUREAU OF INVESTIGATION  
INVESTIGATIVE REPORT**

**Case # :** NA-16A-000156

**IR # :** 32

**Author:** Smith, Ramona P

**Activity Date:** 12/05/2018

**Case Agent:** Smith, Ramona P

**Report Date:** 03/19/2019

**SAC/ASAC:** Long, Douglas R

**Approved By:** Long, Douglas R

**Description:** Interview - Recorded - RADONDA LEANNE VAUGHT

(S) RADONDA L VAUGHT, RN, W/F, DOB: 01/25/1984

(V) CHARLENE M MURPHEY, W/F, DOB: 07/21/1942

On December 5, 2018, TBI SA Angel Beverly and I interviewed RADONDA VAUGHT at TBI Headquarters located at 901 R.S. Gass Boulevard in Nashville, Tennessee. After proper identification and explanation of the purpose for the interview, VAUGHT was administered her Warnings as to Constitutional Rights and she voluntarily waived those rights by signing the attached waiver, TBI Form B1-0011. VAUGHT voluntarily provided an audio recorded statement. The recording has been saved and is in the custody of this agent. A brief summary of the interview is as follows:

VAUGHT worked on the Neuro Intensive Care Unit (NICU) and Neuro Step Down Unit at Vanderbilt University Medical Center (VMC) from November 2015 to January 2018. She was terminated on January 3, 2018 for Failure to Follow Medication Administration Procedures.

VAUGHT was working as the Help All nurse; she was comfortable with that position and knew what was expected of her in that position.

She was familiar with the Accudose machines and how to access the medication held within the machines.

She had worked December 25, 2017 (Christmas Day) and December 26, 2017 on the 7:00 am to 7:00 pm shift. She stated she was not overtired.

VAUGHT stated they were not understaffed, the NICU is always staffed due to the acuity of the patients. VAUGHT said the NICU is never short-handed.

She had a new orientation employee with her, Darren, but she told the night nurse that assigned him to work with her that she (VAUGHT) was comfortable having him with her as the Help All nurse.

When VAUGHT went to the Accudose machine to pull the medication to take to CHARLENE MURPHEY, she couldn't find Versed in MURPHEY'S profile. She checked the Medication Administration Record (MAR) in a different computer and found the order was there for Versed. Since she couldn't find the Versed in the Accudose system, she overrode the system, typed in VE, and selected the first medication (Vecuronium Bromide) in the list. The system asked for a reason for the override, but she couldn't recall what reason she selected.

This confidential document is the property of TBI.  
Its contents are not to be distributed outside of your agency.

IR # 32  
Page 1

VAUGHT looked at the back of the vial and saw that it needed to be reconstituted but never looked at the front of the vial. She went down with Darren to the PET Scan Unit and found MURPHEY. She verbally verified who MURPHEY was but could not find a computer to scan the medication. She reconstituted the vial, gave MURPHEY one (1) milligram; and left her with the PET Scan Unit tech. After administering the medication, she never scanned it to put in into the medical record.

After the code was called on MURPHEY and MURPHEY was brought back to the NICU from the PET Scan Unit, VAUGHT informed Dr. Neeley and Lindsey Trantham, Acute Care Nurse Practitioner, that she had given Vecuronium Bromide to MURPHEY. Their response was "I'm so sorry".

Misty Ashby, Unit Manager, advised her not to scan medication, the MAR would note it.

VAUGHT admitted she had administered Versed before, but never Vecuronium Bromide.

VAUGHT admitted to being distracted by talking to Darren about the Swallow Study they were going to do.

VAUGHT admitted she shouldn't have been distracted with something other than "meds" at the time of the dispensing.

VAUGHT admitted she shouldn't have overrode the system though it is common to do so.

VAUGHT admitted it struck her as a little odd that she had to reconstitute the medication.

VAUGHT didn't recall anything on the vial to alert her, but she said she should have recognized the difference.

VAUGHT admitted she was distracted. She stated she should have paid attention and shouldn't have overrode the medication because it wasn't an emergency.

VAUGHT stated she should have called the pharmacy to check the status on the order for Versed.

VAUGHT admitted she was thinking, "I probably just killed a patient"; "What did I do to this patient if I didn't kill her?"; "What kind of life changing things did I just put this patient and her family through?"; "It's a horrible situation".

VAUGHT admitted she had "fucked" up.

RS/dpi

Attachment #19

APPROVED: \_\_\_\_\_

DATE: \_\_\_\_\_

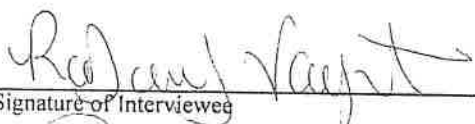
**TENNESSEE BUREAU OF INVESTIGATION  
WARNINGS AS TO CONSTITUTIONAL RIGHTS**


Before we ask you any questions, you must understand your constitutional rights:

- RLV You have the right to remain silent, and you need not answer any questions;
- RLV If you do answer questions, your answers can be used as evidence against you in court;
- RLV You have the right to consult with a lawyer before or during questioning;
- RLV If you cannot afford to hire a lawyer, one will be provided to you without cost;
- RLV If you decide to answer questions now, without a lawyer present, you will still have the right to stop answering questions at any time until you talk to a lawyer.

**WAIVER**

I have read, or have had read to me, my constitutional rights. I understand what my rights are, and I am willing to make a statement and answer questions without a lawyer being present.

  
\_\_\_\_\_  
Signature of Interviewee

  
\_\_\_\_\_  
Signature of Special Agent

Witness:  \_\_\_\_\_

Witness: \_\_\_\_\_

DATE: 12/5/18 TIME: 10 11am

Agent - Retain Original. Send Copy to TBI Case File.



# Master Name Criminal History Information (PCHIS - Police)

METROPOLITAN POLICE DEPARTMENT  
Of Nashville and Davidson County

NAME

MARTIN, RADONDA L

ADDRESS

2819 HINSON ROAD WOODLAWN TN 37191

HOME TELEPHONE

OCA

OLN

MNI

58335084

JUV OCA

ST

TN

SSN

DOB

1/25/1984

FBI

SEX

F

SID

RACE

W

"No Image Available"

NAME

MARTIN, RADONDA L

ADDRESS

2819 HINSON ROAD WOODLAWN TN 37191

HOME TELEPHONE

OCA

OLN

MNI

58335084

JUV OCA

ST

TN

SSN

DOB

1/25/1984

FBI

SEX

F

SID

RACE

W

"No Image Available"

RELATIVE(S), RELATIONSHIP, ADDRESS

PLACE OF BIRTH (City/State)

HISTORY - NAME, SSN, DOB

LAST NAME FIRST NAME

HISTORY - ADDRESS (RECORD COUNT: 0)

STREET

CITY

MIDDLE NAME

SSN HISTORY

DATE USED

DOB HISTORY

DATE USED

STATE

ZIP

DATE UPDATED

DATE ENTERED



**TENNESSEE BUREAU OF INVESTIGATION**

Document Seq: 762501 Forensic Services Request for Examination - NCRA (Non-Use of Force)

Enrollment: 00087-2 Attachments: Forensic Services Request for Examination, p. 1  
 Nashville, TN 37216-2639      Knoxville, TN 37914      Memphis, TN 38134  
 615-744-4000      865-549-7800      901-379-3400

COMPLETE ALL SECTIONS OF FORM EXCEPT SHADED AREAS

FROM: SA Ramona P. Smith

Officer Email: Ramona.Smith@tn.gov

TBI

Requesting Officer (case assigned)

Agency Case No: NA-16A-000156

Requesting Agency

County of Offense: Davidson

001 RLS, Goss Blvd

Address

Type of Offense: Patient Abuse & Gross Negligence

Nashville

37214

City

ZIP

Phone: (615) 202-8748

Date of Offense: December 26, 2017

Subject	Sex	Race	Date of Birth	Victim	Sex	Race	Date of Birth
Radonda L. Vaught	F	W	1/25/1984	Charlene M. Murphey	F	W	7/21/1942

Statement of Facts: On December 26, 2017, Register Nurse Vaught was ordered to administer Versed to patient Murphey

LAB ONLY	Item Number	Description of Evidence	Where Recovered
	1	Plastic bag labeled Versed containing one vial	Vanderbilt Medical Center
		labeled vecuronium bromide, two syringes, one	
		large alcohol prep pad	

**Examination**

Requested: Photography of each individual item. Develop prints on each item including plastic bag. Determine substance in each syringe and in the vial. Determine how much of each substance in both the vial and syringes.

Has other evidence been submitted on this case?

I certify this evidence is associated with a criminal or death investigation:

YES ☐ NO ☐ , Lab No. \_\_\_\_\_

Signature: [Signature]

Submitted by: SA Ramona P. Smith

**FOR VCRT USE ONLY**

Type of packaging:

☐ Contents NOT verified at the time of receipt

Initials/Date \_\_\_\_\_

Received by: \_\_\_\_\_

Received from: \_\_\_\_\_

☐ Gun Check OK

Initials/Date \_\_\_\_\_

Date Received: \_\_\_\_\_

**FOR LABORATORY USE ONLY**

Type of packaging: 1 splb

Received by: Teresa Weston

Received from: Ramona Smith

Date Received: 12-7-18 135

<input checked="" type="checkbox"/> ALC
<input checked="" type="checkbox"/> DI
<input checked="" type="checkbox"/> FAID
<input checked="" type="checkbox"/> LP
<input checked="" type="checkbox"/> SERO
<input checked="" type="checkbox"/> TOX
<input checked="" type="checkbox"/> MICRO

☐ Package opened to retrieve request form

☐ Request form on outer packaging

☐ Contents NOT verified at the time of receipt

Initials/Date \_\_\_\_\_

☐ Gun Check OK

Initials/Date \_\_\_\_\_

☐ Explosives Check

Initials/Date \_\_\_\_\_

LAB #

181-024979

\\Fs01\math\2015-22\Attachments\Forensic Services Request for Examination.pdf

**Statement of Facts, Remarks:**

for a medical procedure. Vaught dispensed and administered vecuronium bromide instead of Versed.

Vecuronium bromide is a paralytic drug and was not ordered for this patient.

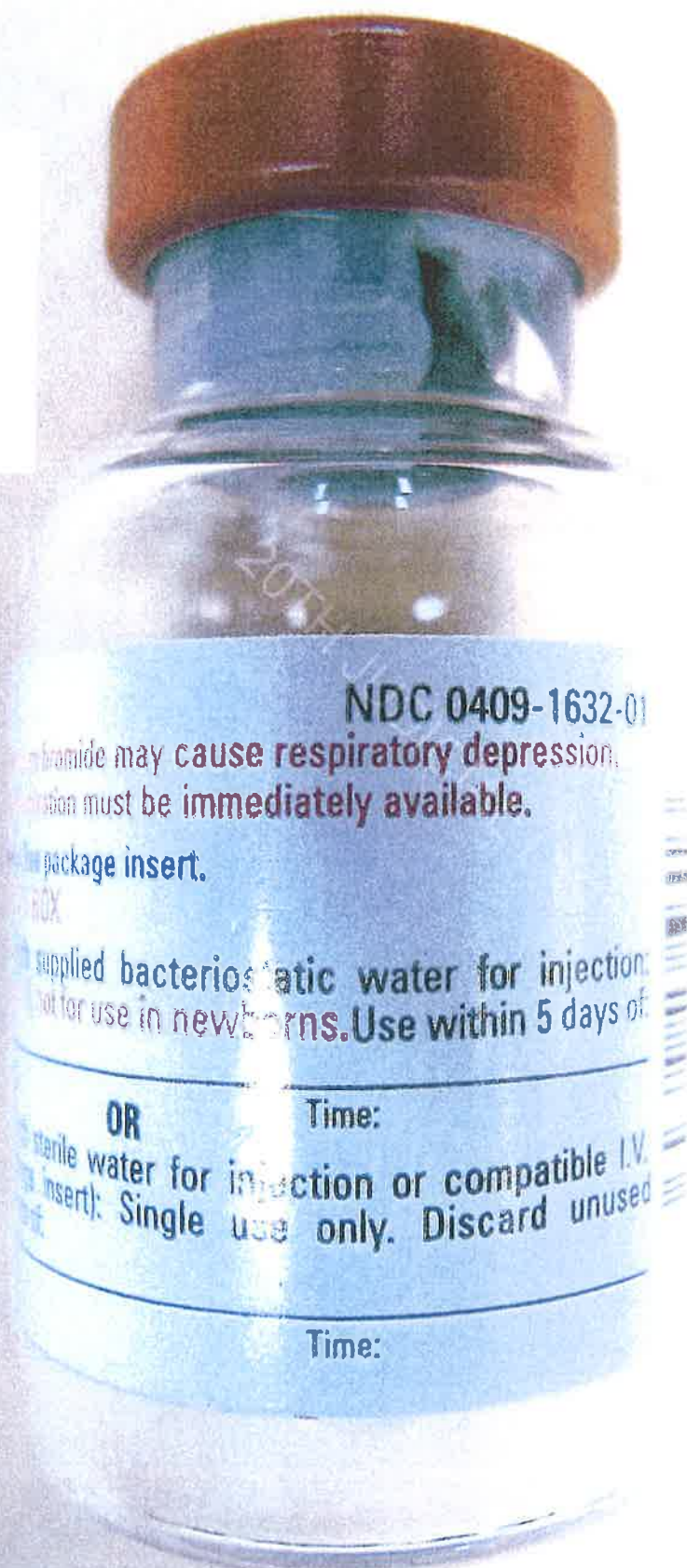
[illegible]

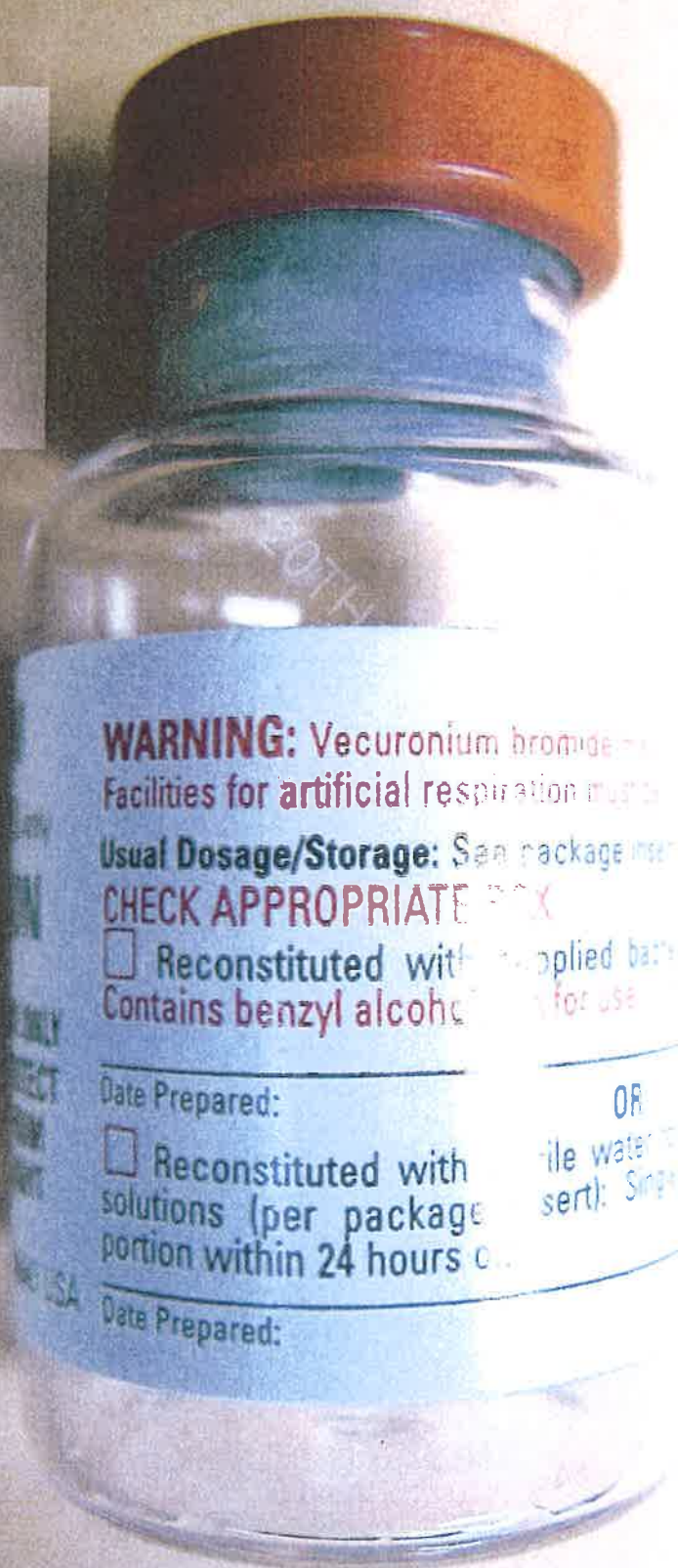


10 mg \*  
FOR IV USE ONLY  
PROTECT FROM LIGHT  
1 mg/mL when  
reconstituted to 10 mL  
Hospital, Inc., Lake Forest, IL 60045

VECURONIUM  
BROMIDE  
FOR INJECTION







**WARNING:** Vecuronium bromide is a muscle relaxant. It should be used only in facilities for artificial respiration machines.

**Usual Dosage/Storage:** See package insert.

**CHECK APPROPRIATE BOX**

☐ Reconstituted with supplied bacteriostatic water for use.  
Contains benzyl alcohol.

Date Prepared:

OR

☐ Reconstituted with sterile water for injection (per package insert). Single use.  
Use within 24 hours of reconstitution.

Date Prepared:







Injection:

days of:

compatible I.V.

not unused



RL-2258 (8/07)

EXP 15SEP21

LOT 691203













Franklin Lakes, NJ 07417

BD PosiFlush™

8290-306547

REF 306547

DGL213703 500014192

Lot

7297648

Exp.

2020-10-31

(01)00382903065479













**0.9% SODIUM CHLORIDE INJECTION, USP**

**Sterile Solution • Single Use • Normal Saline**

This product is not made with natural rubber latex or preservatives.





Franklin Lakes, NJ 07417

BD PosiFlush™

8290-306547

REF 306547

DGL213703 500014192



(01)00382903065479

Lot

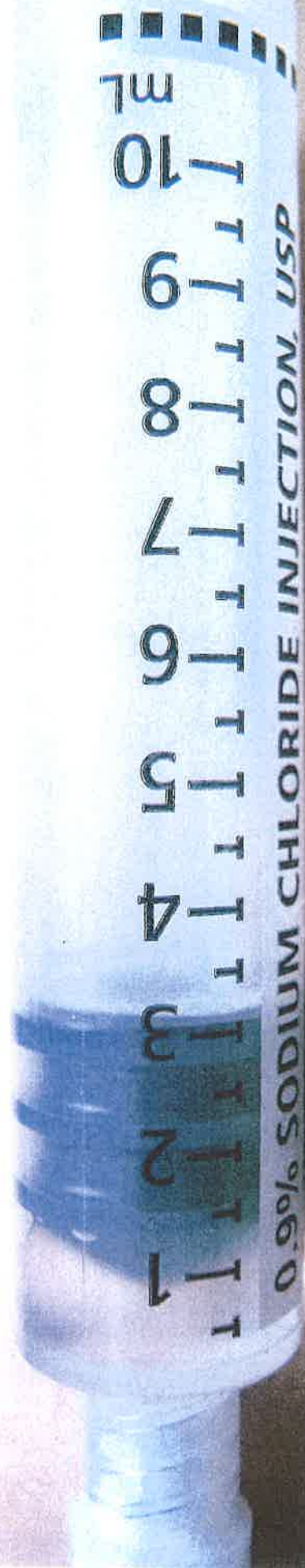
7297648

Exp.

2020 - 10 - 31



6250 005  
REF 306547 DGL213703 500014192 Exp. 2020-10-31














Nashville Crime Laboratory  
TBI - Middle CID  
Case # 191024975 Exhibit  
Rcvd Weston, Teresa  
AKD435CZ0UBV5A  
1 sp1b

Nashville Crime Laboratory  
IBI - Middle CID  
Case # 181028979  
Rosa Weston, Teresa  
AKD435CZ0UE17P

Nashville Crime Laboratory  
 FBI - Middle CID  
 Case # 191824579  
 Rava, Weston, Teresa  
 Exhibit 12  
 AKD435CZ0UEX4H  
 Syringe

Nashville Crime Laboratory  
TBI - Middle CJD  
Case # 181024979 Exhibit # 001-b  
Rovd Weston, Teresa 12/07/18  
AKD435CZ0ESK5  
Syringe from Vanderbilt Medical Center

Nashville Crime Laboratory  
TB1 - Middle CID  
Case # 181024979 Exhibit # 001-d  
Rond Weston, Teresa 12/07/18

  
AKD435CZ0118A  
Plastic bag from Vanderbilt Medical

Sealing instructions:  
and peel off white  
and firmly apply

...CUT ALL CONTENTS OUT AT THE DOTTED LINE

Condition of Bag When Opened: Sealed ☐ Other ☐

Time

23950

webmaster  
1/1/2000

22



181024979

181024979

181-024979

Nashville Crime Laboratory  
TBI - Middle CID  
Case # 181024979 Exhibit # 001  
Rcvd: Weston, Teresa 12/07/18  
AKD435CZ0UBV5A  
1splb

Nashville Crime Laboratory  
TBI - Middle CID  
Case # 181024979 Exhibit # 001-a  
Rcvd: Weston, Teresa 12/07/18  
AKD435CZ0UEI7P  
Vial from Vanderbilt Medical Center

Nashville Crime Laboratory  
TBI - Middle CID  
Case # 181024979 Exhibit # 001-c  
Rcvd: Weston, Teresa 12/07/18  
AKD435CZ0UEX4H  
Syringe from Vanderbilt Medical Center

Nashville Crime Laboratory  
TBI - Middle CID  
Case # 181024979 Exhibit # 001-b  
Rcvd: Weston, Teresa 12/07/18  
AKD435CZ0UESK5  
Syringe from Vanderbilt Medical Center

Nashville Crime Laboratory  
TBI - Middle CID  
Case # 181024979 Exhibit # 001-d  
Rcvd: Weston, Teresa 12/07/18  
AKD435CZ0UI18A  
Plastic bag from Vanderbilt Medical Center



Caution: DO NOT OPEN FROM THIS END. Tamper Evident Seal  
Distortion or the appearance of VOID may indicate tampering.



☒ EVIDENCE ☐ FOUND PROPERTY ☐ SAFE KEEPING

SEALED BY: SA Ramona P. Smith

DATE: 11/28/18 TIME: 12:30 pm Lab

Agency TBSL Case No. N/A-10A-000153

Offense 71-6-119 Item No. 1

Suspect Rodonda Vaughn

Victim Charlene Murphey

Date & Time of Recovery 11/28/18 12:30pm

Collected By SA Ramona P. Smith

Description Plastic baggie containing 1/2 of Vicorban Bromide 10mg;

2 syringes with unknown substance; alcohol prep pad

Location Vanderbilt 2135 Blakemore Ave

FROM

CHAIN OF CUSTODY

TO

DATE

TIME



REF DYND30261



**BIOHAZARD**

**Product Facts**  
Uses ■ For removal of oint and residue from skin  
Directions ■ Apply to skin as needed ■ Do not get  
into eyes ■ Do not use ■ Do not apply  
over large areas of the body ■ If irritation and redness  
develop, discontinue use and consult a healthcare  
provider ■ If accidentally swallowed, seek medical  
attention ■ Do not inhale

VECURONIUM  
BIOMIDE  
FOR INJECTION

☐ FROZEN

☐ REFRIGERATE

☐ ROOM TEMPERATURE

www.medline.com Manufactured for: Medline Industries Inc.  
Mundelein, IL 60060 USA











## Product Uses



ERE

PLACE PAPERWORK HERE

PLACE PAPERWORK HERE

DAVIDSON



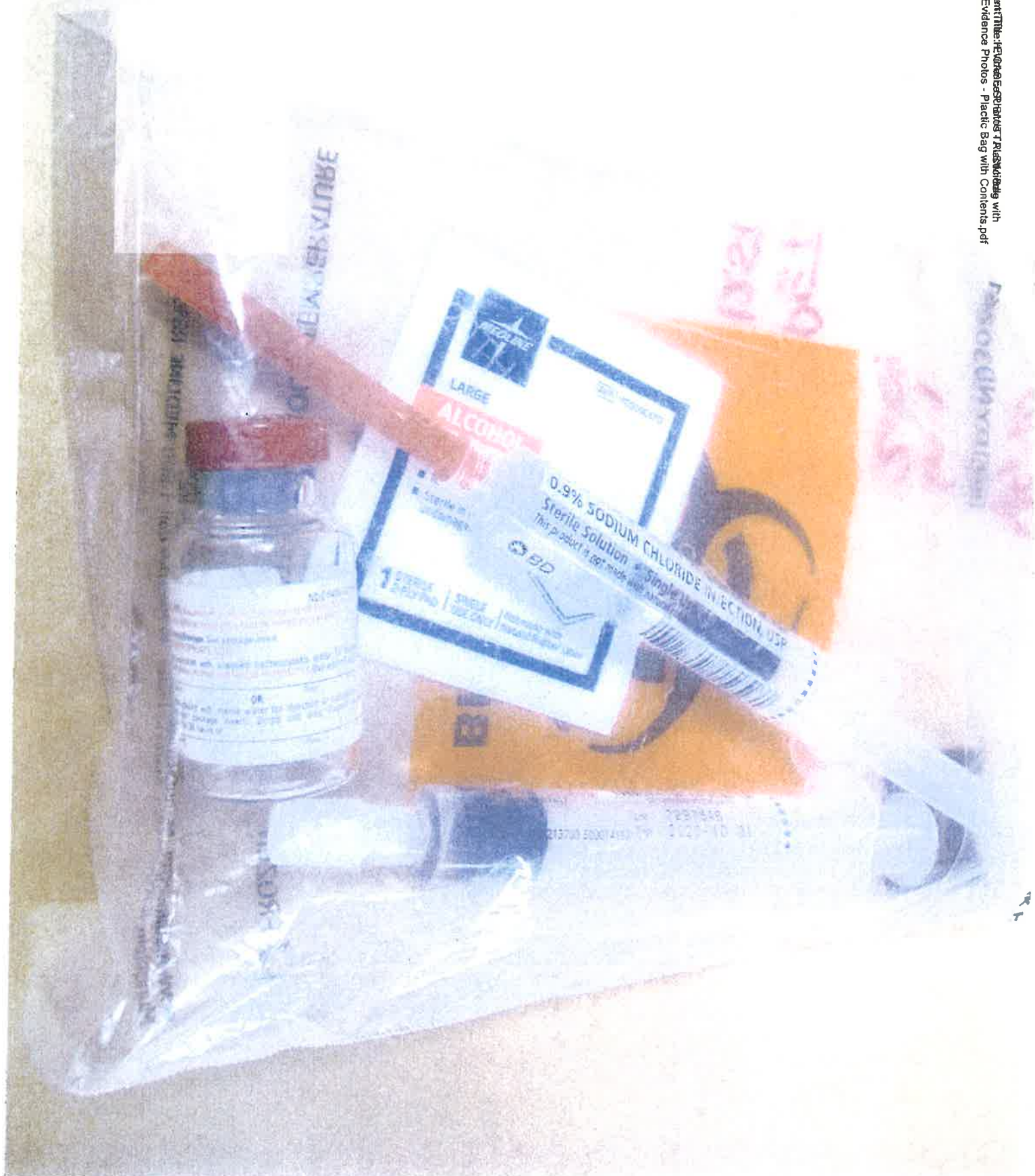
10-0-2022

REATURE

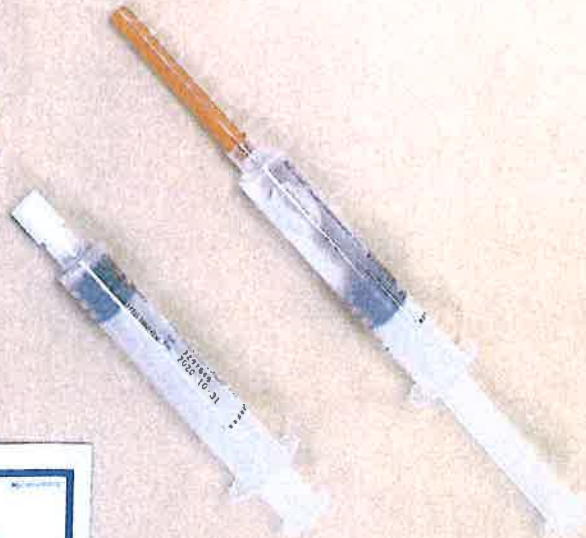
NO. 100

10-0-2022













# BIOHAZARD

☐ FROZEN

 REFRIGERATE☐ ROOM TEMPERATURE

www.medline.com Manufactured for: Medline Industries Inc.  
Mundelein, IL 60060 USA Made in China To Reorder Call: 1-800-MEDLINE RG16YUE







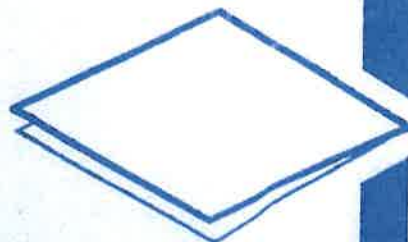


REF MDS090670

**LARGE**

# ALCOHOL PREP PAD

- 70% Isopropyl Alcohol
- Sterile in unopened, undamaged package



**1** STERILE | SINGLE | Not made with  
2-PLY PAD | USE ONLY | Natural Rubber Latex



## Product Facts

**Uses** ■ For removal of oils and residue from skin

**Directions** ■ Apply to skin as needed ■ Do not get into eyes ■ Discard after single use ■ Do not apply over large areas of the body ■ If irritation and redness develop, discontinue use and consult a healthcare provider ■ If accidentally swallowed, seek medical help or contact a Poison Control Center right away

## Warnings

**Keep out of reach of children.**

**For external use only.**

**Flammable. Keep away from fire or flame.**

**Ingredients** Isopropyl alcohol, water

**Other information** ■ Protect from freezing, avoid excessive heat

**www.medline.com** Medline is a registered trademark of Medline Industries, Inc. Made in China for Medline Industries, Inc., Northfield, IL 60093 USA. **1-800-MEDLINE** RD17CN1

LOT 52717070038

 Date of manufacture 07-20-2017











REF MDS0900670

LARGE

# ALCOHOL PREP PAD

- 70% Isopropyl Alcohol
- Sterile in unopened, undamaged package



↑ STERILE | SINGLE | Not made with  
2-PLY PAD | USE ONLY | Natural Rubber Latex

181024979-001c 004



**Uses** ■ For removal of oils and residue from skin

**Directions** ■ Apply to skin as needed ■ Do not get into eyes ■ Discard after single use ■ Do not apply over large areas of the body ■ If irritation and redness develop, discontinue use and consult a healthcare provider ■ If accidentally swallowed, seek medical help or contact a Poison Control Center right away

## Warnings

**Keep out of reach of children.  
For external use only.  
Flammable. Keep away from fire or flame.**

**Ingredients** Isopropyl alcohol, water

**Other information** ■ Protect from freezing, avoid excessive heat

**www.medicine.com** Medicine is a registered trademark of  
Medline Industries, Inc. Made in China for Medline Industries, Inc.,  
Northfield, IL 60093 USA. **1-800-MEDLINE** RD17CN1

LOT 52717070038

 Date of manufacture 07-20-2017



January 3, 2018

RaDonda Vaught

Bethpage, TN 37022

Dear RaDonda,

A significant patient safety and care event occurred on December 26, 2017. The hospital conducted an internal investigation, interviewing you during the fact finding process. It has been determined that you did not validate the five rights of medication administration, per policy, which is part of your responsibility and within your scope of practice as a Registered Nurse. As a result of these findings, the decision has been made to end your employment as a Registered Nurse in our Neuro ICU at Vanderbilt University Medical Center.

After a thorough review of findings, as well as your admissions and review of the incident, it has been determined that because of these actions you will not be eligible for rehire at Vanderbilt in the future. In addition, we are obligated to report this incident to the Tennessee Board of Nursing for violation of their rules.

Please return all Vanderbilt property (key and ID badge) at this time. If you are currently enrolled in a benefits plan, you may be eligible for continuation through COBRA. You will receive information regarding that process from the benefits office.

Sincerely,

Marcee Lupica RN, BSN, MBA, NEA-BC  
Associate Nursing Officer, Neuroscience Patient Care Center

Misty Ashby, RN, MSN, SCRNP  
Manager, Neuro ICU

Employee's Signature

**Radonda Vaught**  
**Sequence of Events for Override**

- Vaught pulled up patient profile in Acudose system and could not find medication prescribed by MD and reviewed/approved by pharmacy.
- Failed to contact pharmacy to confirm medication order before overriding the system.
- Vaught begins the override:

**Warning #1:** “Override medications should only be accompanied by STAT orders or when the clinical status of a patient would be significantly compromised by the delay that would result from pharmacist review.”

- *Vaught begins the override by typing the letters ‘VE’ to search for “Versed”, “Vecuronium bromide” comes up first on the list as Acudose searches by generic name, not brand name, as the default. Versed is the brand name for the medication “Midazolam”.*

**Warning #2:** System prompts user with a pop-up screen asking for a reason for the override with justifications such as: “Urgently needed such that delay might cause patient harm”; “Prescriber is physically present and can oversee administration”; etc., and clearly states “PARALYZING AGENT” at top of the list. User must select a reason for the override and press another button to continue with the override.

**Warning #3:** Screen returns to the selected medication “Vecuronium Bromide” with a notation of “PARALYZING AGENT”.

**Warning #4:** Another pop-up screen appears showing an Alert once the “Vecuronium Bromide” is selected, warning that it is a “PARALYZING AGENT” and that the medication “Causes Respiratory Arrest” and that “Patient Must Be Ventilated” and the user must then press another prompt to remove the warning.

**Warning #5:** User is asked to select quantity of drug and at the top of that screen is another warning for “PARALYZING AGENT” and also a yellow caution sign and highlighted “Alert” appears on the screen.

- Vaught then failed to respond to a number of “red flags” between the time she removed the paralyzing agent from the drawer and then administered the drug to the Victim who was awaiting her PET scan.
  - **Red Flag #1:** Vecuronium bromide comes in powder form as opposed to liquid form like Versed/Midazolam.
  - **Red Flag #2:** The cap for the Vecuronium bromide bottle is red and states “Paralyzing Agent”.



- **Red Flag #3:** Vaught would have had to read the instructions to reconstitute on the Vecuronium bottle yet went forward despite the fact that the bottle said “Vecuronium Bromide” and not “Versed” or “Midazolam”.
  - **Red Flag #4:** Vaught would have to shake the bottle to reconstitute the medication which is not a process for Versed/Midazolam.
  - **Red Flag #5:** Vaught would have to look directly at the red-capped bottle with the inscription “Warning: Paralyzing Agent” and syringe in order to draw exactly 1 ML of medication in order to administer that dose.
- *Vaught was informed that the staff in PET could NOT administer the medication because they were running scans and could not monitor the patient after the medication was administered.*
  - *Vaught administered the medication and immediately left the Victim alone in the PET waiting room on a mobile bed.*
  - *The Victim would have shown signs of acute Vecuronium intoxication which would have caused paralysis and respiratory failure within minutes after the drug was administered and since Vaught did not follow mandated observation protocol, the Victim was left unattended when showing signs of the onset of respiratory failure.*