BEFORE THE VIRGINIA BOARD OF NURSING

IN RE:

KRYSTAL JAKEALENE IRVIN WATSON, L.P.N.

License Number:

0002-089318

Issue Date:

July 16, 2013

Expiration Date:

November 30, 2016

Case Number:

171566

NOTICE OF INFORMAL CONFERENCE AND STATEMENT OF ALLEGATIONS

You are hereby notified that an Informal Conference has been scheduled before the Board of Nursing ("Board") regarding your license to practice practical nursing in the Commonwealth of Virginia.

TYPE OF PROCEEDING:	This is an informal conference before a Special Conference Committee ("Committee") of the Board.
DATE AND TIME:	October 18, 2016 1:00 P.M.
PLACE:	Virginia Department of Health Professions Perimeter Center - 9960 Mayland Drive 2 nd Floor - Virginia Conference Center Henrico, Virginia 23233

LEGAL AUTHORITY AND JURISDICTION:

- 1. This informal conference is being held pursuant to Virginia Code §§ 2.2-4019 and 54.1-2400(10). This proceeding will be convened as a public meeting pursuant to Virginia Code § 2.2-3700.
- 2. At the conclusion of the proceeding, the Committee is authorized to take any of the following actions:
 - Exonerate you;
 - Reprimand you;
 - Require you to pay a monetary penalty;
 - Place you on probation and/or under terms and conditions;
 - Refer the matter to the Board of Nursing for a formal administrative hearing;
 - Offer you a consent order for suspension or revocation of your license in lieu of a formal hearing.

Krystal Jakealene Irvin Watson, L.P.N.-NOTICE OF INFORMAL CONFERENCE September 22, 2016 Page 2 of 3

ABSENCE OF RESPONDENT AND RESPONDENT'S COUNSEL:

If you fail to appear at the informal conference, the Committee may proceed to hear this matter in your absence and may take any of the actions outlined above.

RESPONDENT'S LEGAL RIGHTS:

You have the right to the information on which the Committee will rely in making its decision, to be represented by counsel at this proceeding, to subpoena witnesses and/or documents, and to present relevant evidence on your behalf.

INFORMAL CONFERENCE MATERIALS:

Enclosed is a copy of the documents that will be distributed to the members of the Committee and will be considered by the Committee when discussing any allegations with you and when deliberating on your case. These documents are enclosed <u>only</u> with the notice sent by certified mail, which you may be required to claim at the post office. Please bring these documents with you to the informal conference.

FILING DEADLINES:

- 1. Deadline for filing materials: October 11, 2016. Submit 5 copies of all documents you want the Board to consider to Dawnyel Towles, Board of Nursing, 9960 Mayland Drive, Suite 300, Henrico, Virginia 23233. Exhibits may not be sent by facsimile or e-mail.
- 2. Deadline for filing motions, including requests for continuance or objections to exhibits, in writing, to Dawnyel Towles at the above address: October 11, 2016. NOTE: Failure to object to the distribution prior to the proceeding will not affect your right to contest any information contained in these documents at the proceeding.

REQUEST FOR A CONTINUANCE

Absent exigent circumstances, such as personal or family illness, a request for a continuance after **October 11, 2016**, will not be considered. If you obtain counsel, you should do so as soon as possible, as a motion for a continuance due to the unavailability of counsel will not be considered unless received by **October 11, 2016**.

STATEMENT OF ALLEGATIONS

The Board alleges that:

- 1. At all times relevant hereto, Krystal Jakealene Irvin Watson, L.P.N., was licensed to practice practical nursing in the Commonwealth of Virginia.
- 2. Krystal Jakealene Irvin Watson, L.P.N., violated Virginia Code § 54.1-3007(2), (5), and (6) and 18 VAC 90-20-300(A)(2)(c) and (e) of the Regulations Governing the Practice of Nursing in that during the course of her employment with Carrington Place of Rural Retreat, Rural Retreat, Virginia, on or about January 11-12, 2016, she diverted a card containing approximately nine tablets of oxycodone (C-II) for her personal and/or unauthorized use. Further, she removed the narcotic count sheet and falsified the narcotic card log in an effort to conceal the diversion.
- 3. Ms. Watson violated Virginia Code § 54.1-3007(6) in that she is unsafe to practice practical nursing due to her admitted addiction to opiates.

Gloria Mitchell-Lively, R.N., M.S.N., M.B.A.

Deputy Executive Director Virginia Board of Nursing

2007 99 9016