

**VIRGINIA:**

**BEFORE THE BOARD OF NURSING**

**IN RE:           KATHERINE D. C. WATSON, L.P.N. REINSTATEMENT APPLICANT  
                  LICENSE NO.: 0002-063513**

**NOTICE OF HEARING**

Pursuant to §§ 2.2-4020, 2.2-4024(F), and 54.1-2400(11) of the Code of Virginia (1950), as amended ("Code"), Katherine D. C. Watson, who, prior to its mandatory suspension by the Department of Health Professions on January 31, 2008, held License No. 0002-063513 to practice practical nursing in Virginia, is hereby given notice that a formal administrative hearing will be held in the presence of a panel of the Board of Nursing. The hearing will be held on July 19, 2012, at 11:00 a.m., at the offices of the Department of Health Professions, Board of Nursing, Perimeter Center, 9960 Mayland Drive, Suite 201, Henrico, Virginia 23233, at which time Ms. Watson will be afforded the opportunity to be heard in person or by counsel.

At the hearing, Ms. Watson has the following rights, among others: the right to representation by counsel; the right to have witnesses subpoenaed and to present witnesses on her behalf; the right to present documentary evidence; and the right to cross-examine adverse witnesses. If Ms. Watson desires any witnesses to appear on her behalf, she must notify the Director of Administrative Proceedings, Department of Health Professions, 9960 Mayland Drive, Suite 300, Henrico, Virginia 23233, in accordance with the Instructions for Requesting Subpoenas.

The purpose of the hearing is to receive and act upon Ms. Watson's application for reinstatement of her license to practice practical nursing in Virginia and to inquire into evidence that Ms. Watson may have violated certain laws and regulations governing nursing practice in Virginia, as more fully set forth in the Statement of Particulars below.

The burden rests upon Ms. Watson, as the applicant, to demonstrate that she is capable of resuming the safe and competent practice of practical nursing in Virginia.

Pursuant to § 54.1-2409(D) of the Code, reinstatement of Ms. Watson's license requires the affirmative vote of three-fourths of the members of the Board in attendance at the hearing.

### **STATEMENT OF PARTICULARS**

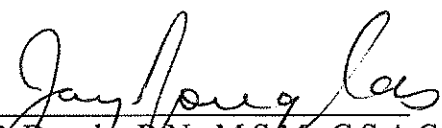
The Board alleges that:

1. Katherine D. C. Watson, L.P.N. may have violated § 54.1-3007(4) of the Code in that:
  - a. On or about January 14, 2008, she was convicted of four felony counts of obtaining drugs by fraud in the Circuit Court of New Kent County, Virginia.
  - b. On or about May 26, 2010, she was convicted of one count of bad check and two counts of uttering, and on or about March 29, 2010, she was convicted of three counts of worthless check, all felonies, in the Circuit Court of Hanover County, Virginia.
  - c. On or about March 4, 2010, she was convicted of obtaining money or property by false pretenses, a felony, in the Circuit Court of the County of Henrico, Virginia.
2. Ms. Watson may have violated § 54.1-3007(2), (5) and (8) of the Code and 18 VAC 90-20-300(A)(2)(c) and (e) of the Regulations Governing the Practice of Nursing ("Regulations") in that on or about May 6, 2007, May 17, 2007, and May 20, 2007, by her own admission, during the course of her employment with Cardiovascular Associates of Virginia ("Cardiovascular Assoc."), Richmond, Virginia, Ms. Watson wrote prescriptions for narcotic medications for her husband on a prescription pad she had obtained from the office.
3. Ms. Watson may have violated § 54.1-3007(2), (5) and (8) of the Code and 18 VAC 90-20-300(A)(2)(b) and (e) of the Regulations in that during the course of her employment she provided Cardiovascular Assoc. with a forged document from the Virginia Department of Health ("DOH") identifying

her as an instructor of Advanced Cardiac Life Support (“ACLS”), when, in fact DOH does not issue such certificates. Further in 2007, Ms. Watson instructed the Cardiovascular Assoc. staff in ACLS, when she had not been trained to do so.

4. Ms. Watson may have violated § 54.1-3007(6) of the Code in that she may be unsafe to practice practical nursing due to mental illness. Specifically, Ms. Watson was diagnosed with post-traumatic stress disorder, anxiety, suicide ideation and bereavement.

FOR THE BOARD

  
Jay P. Douglas R.N., M.S.M., C.S.A.C.  
Executive Director for the  
Board of Nursing

ENTERED: 