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**BEFORE THE BOARD OF MEDICAL EXAMINERS
OF THE STATE OF NEVADA**

In the Matter of Charges and)
)
Complaint Against)
)
CATHALINE L. PEARSON, P.A.-C,)
)
Respondent.)

Case No. 12-30027-1

FILED

DEC 20 2012

NEVADA STATE BOARD OF
MEDICAL EXAMINERS
By: 

COMPLAINT

The Investigative Committee (IC) of the Nevada State Board of Medical Examiners (Board), composed at the time of filing of Theodore B. Berndt, M.D., Chairman, Valerie J. Clark, BSN, RHU, LUTCF, Member, and Michael J. Fischer, M.D., Member, by and through Erin L. Albright, Esq., Deputy General Counsel and attorney for the IC, having a reasonable basis to believe that Cathaline L. Pearson, P.A.-C (Respondent), violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 (Medical Practice Act), hereby issues its formal Complaint, stating the IC's charges and allegations as follows:

FACTUAL BACKGROUND

1. Respondent has been licensed by the Board since December 20, 2004, pursuant to the provisions of the Medical Practice Act.
2. Respondent is currently licensed in active status (License No. PA895).
3. Patient A was a fifty-six (56)-year-old male at the time of the incidents in question. His true identity is not disclosed in this Complaint to protect his identity, but his identity is disclosed in the Patient Designation contemporaneously served on Respondent with a copy of this Complaint.

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COUNT II

(One Violation of NRS 630.301(5))

13. All of the allegations in the above paragraphs are hereby incorporated as if fully set forth herein.

14. NRS 630.275(7) provides that the Board shall adopt regulations regarding the grounds and procedures respecting disciplinary actions against physician assistants.

15. NAC 630.380(1)(m) provides that a violation of NRS 630.301 is grounds for instituting a disciplinary action against a physician assistant.

16. NRS 630.301(5) provides that the engaging by a practitioner in any sexual activity with a patient who is currently being treated by the practitioner is grounds for instituting a disciplinary action against the practitioner.

17. As outlined above, Respondent was involved in a sexual relationship with Patient A when she received and reviewed Patient A's blood work and administered two injections of testosterone and one injection of vitamin B-12 to Patient A.

18. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NAC 630.410.

COUNT III

(One Violation of NRS 630.3062(1))

19. All of the allegations in the above paragraphs are hereby incorporated as if fully set forth herein.

20. NRS 630.275(7) provides that the Board shall adopt regulations regarding the grounds and procedures respecting disciplinary actions against physician assistants.

21. NAC 630.380(1)(m) provides that a violation of NRS 630.3062 is grounds for instituting a disciplinary action against a physician assistant.

22. NRS 630.3062 (1) provides that the failure to maintain timely, legible, accurate and complete medical records relating to the diagnosis, treatment and care of a patient is grounds for initiating discipline against a physician assistant.

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1 23. Respondent failed to maintain timely, legible, accurate and complete medical
2 records relating to the diagnosis, treatment and care of Patient A when she failed to maintain
3 health care records for Patient A regarding the receipt and review of Patient A's blood work and
4 administration of the two testosterone injections and the one vitamin B-12 injection.

5 24. By reason of the foregoing, Respondent is subject to discipline by the Board as
6 provided in NAC 630.410.

7 **WHEREFORE**, the Investigative Committee prays:

8 1. That the Board give Respondent notice of the charges herein against her and give
9 her notice that she may file an answer to the Complaint herein as set forth in NRS 630.339(2)
10 within twenty (20) days of service of the Complaint;

11 2. That the Board set a time and place for a formal hearing after holding an
12 Early Case Conference pursuant to NRS 630.339(3);

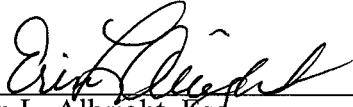
13 3. That the Board determine the sanctions it will impose if it finds Respondent
14 violated the Medical Practice Act;

15 4. That the Board make, issue and serve on Respondent, in writing, its findings of
16 fact, conclusions of law and order, which shall include the sanctions imposed; and

17 5. That the Board take such other and further action as may be just and proper in these
18 premises.

19 DATED this 19th day of December, 2012.

20 INVESTIGATIVE COMMITTEE OF THE
21 NEVADA STATE BOARD OF MEDICAL EXAMINERS

22 By: 
23 Erin L. Albright, Esq.
24 Deputy General Counsel
25 Attorney for the Investigative Committee

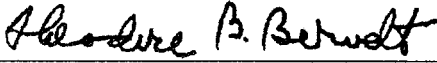
VERIFICATION

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STATE OF NEVADA)
 : ss.
COUNTY OF WASHOE)

Theodore B. Berndt, M.D., hereby deposes and states under penalty of perjury under the laws of the state of Nevada that he is the Chairman of the Investigative Committee of the Nevada State Board of Medical Examiners that authorized the foregoing Complaint against the Respondent herein; that he has read the foregoing Complaint; and that based upon information discovered during the course of the investigation into a complaint against Respondent, that he believes the allegations and charges in the foregoing Complaint against Respondent are true, accurate and correct.

Dated this 20th day of December, 2012.



Theodore B. Berndt, M.D.

CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 20th day of December 2012; I served a filed copy of the Complaint, Patient Designation and Fingerprint information via USPS e- certified return receipt mail to the following:

Cathaline L. Pearson, P.A.-C.
P.O. Box 34934
Las Vegas, NV 89133

Dated this 20th day of December, 2012.



Angelia L. Donohoe
Legal Assistant

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