

COPY

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

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**In The Matter of Charges and)
Complaint Against)
SALVADOR BORROMEO, M.D.,)
Respondent.)**

Case No. 09-12423-1

FILED

OCT 16 2009

**NEVADA STATE BOARD OF
MEDICAL EXAMINERS**

COMPLAINT

The Investigative Committee of the Nevada State Board of Medical Examiners, composed of Charles N. Held, M.D., Ms. Jean Stoess, M.A., and Benjamin J. Rodriguez, M.D., by and through Edward Cousineau, General Counsel for the Nevada State Board of Medical Examiners, having a reasonable basis to believe that Salvador Borromeo, M.D., hereinafter referred to as "Respondent," has violated the provisions of NRS Chapter 630, hereby issues its formal Complaint, stating the Investigative Committee's charges and allegations, as follows:

1. Respondent is licensed in active status to practice medicine in the state of Nevada, and at all times alleged herein, was so licensed by the Nevada State Board of Medical Examiners, pursuant to the provisions of Chapter 630 of the Nevada Revised Statutes.

2. Patient A was a seventy-six-year-old male at the time of the events at issue. His true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient Designation served on Respondent along with a copy of this Complaint.

3. Patient A presented to Summerlin Hospital in Las Vegas on March 25, 2003, with complaints of chest pain. Medical records indicate that it was believed that Patient A was suffering from acute coronary syndrome and a subsequent echocardiogram showed borderline ST elevation in the inferior leads and a possible old anteroseptal myocardial infarction. Patient A

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1 was admitted to the facility and the admitting physician requested a cardiology consult.
2 Respondent was the consultant and diagnosed Patient A with acute coronary syndrome.

3 4. On March 26, 2003, Patient A's troponin levels increased precipitously, a second
4 echocardiogram accomplished on the previous day, along with one done on the 26th, showed the
5 development of Q waves in the inferior leads and anterior, which was be indicative of a potential
6 myocardial infarction. Medical records indicate Respondent believed that Patient A warranted
7 transfer to a medical facility that could conduct a cardiac catheterization on Patient A. Patient A
8 was never transferred to another facility and ultimately expired on March 30, 2003.

9 5. Section 630.301(4) of the Nevada Revised Statutes provides that malpractice,
10 defined as the failure to use the reasonable knowledge, skill and expertise ordinarily used in
11 similar circumstances, is grounds for discipline.

12 6. Respondent committed malpractice in the course of providing care and treatment to
13 Patient A when he failed to ensure the timely transfer of Patient A to another facility to perform
14 urgent catheterization for the purposes of acutely revascularizing Patient A by either transcatheter
15 intervention or bypass surgery, and is subject to discipline by the Nevada State Board of Medical
16 Examiners as provided in NRS 630.352.

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

18 1. That the Nevada State Board of Medical Examiners fix a time and place for a formal
19 hearing;

20 2. That the Nevada State Board of Medical Examiners give Respondent notice of the
21 charges herein against him, the time and place set for the hearing, and the possible sanctions against
22 him;

23 3. That the Board determine what sanctions it deems appropriate to impose for the
24 violation committed by Respondent; and

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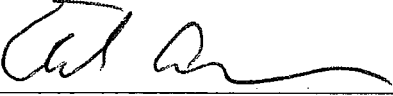
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4. That the Board make, issue and serve on Respondent its findings of facts, conclusions of law and order, in writing, that includes the sanctions imposed.

DATED this 16th day of October, 2009.

By: 
Edward Cousineau
Attorney for the Investigative Committee of the
Nevada State Board of Medical Examiners

CERTIFICATE OF MAILING

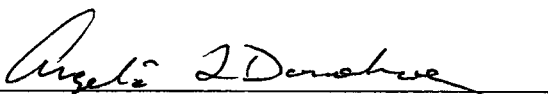
I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on the 16th day of October 2009, I served a file copy of the COMPLAINT, PATIENT DESIGNATION, NOTICE OF PRE-HEARING CONFERENCE AND HEARING, FINGERPRINTING INFORMATION and a copy of the appointment letter, by mailing via USPS certified return receipt mail to the following:

Salvador Borromeo, M.D.
700 Shadow Ln., Ste. 240
Las Vegas, NV 89106

By regular mail to the hearing officer the Complaint, Patient Designation, Appointment Letter and Notice of Pre-hearing Conference and Hearing:

Pat Dolan, J.D., Hearing Officer
7980 Meadow Vista Court
Reno, NV 89511

Dated this 16th day of October 2009.



Angelia Donohoe
Legal Assistant