

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

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5 **In the Matter of Charges and**
6 **Complaint Against**
7 **Angela Lorenzo, PA,**
8 **Respondent.**

Case No. 17-28540-2

FILED

NOV 13 2017

NEVADA STATE BOARD OF
MEDICAL EXAMINERS
By: 

9
10 **COMPLAINT**

11 The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners
12 (Board) hereby issues this formal Complaint (Complaint) against Angela Lorenzo, PA
13 (Respondent), a licensed physician assistant in Nevada. After investigating this matter, the IC has
14 a reasonable basis to believe that Respondent has violated provisions of Nevada Revised Statutes
15 (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the
16 Medical Practice Act). The IC alleges the following facts:

17 1. Respondent's license (License No. PA816) was suspended pursuant to the IC's
18 Order of Summary Suspension filed September 28, 2017 (Suspension Order), which Suspension
19 Order is incorporated herein by this reference. Respondent has been licensed by the Board
20 pursuant to the provisions of the Medical Practice Act since December 9, 2003.

21 2. Pursuant to NAC 630.375(2), a physician assistant shall not perform medical
22 services without supervision from a supervising physician licensed and approved by the Board.

23 3. Pursuant to NRS 630.306(1)(b)(1), a physician assistant may not engage in any
24 conduct which is intended to deceive.

25 4. Pursuant to NRS 630.3065(2)(a), a licensee shall not knowingly or willfully fail to
26 comply with a subpoena or order of the Board.

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¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time the filing of this Complaint was approved, was composed of Wayne Hardwick, M.D., Aury Nagy, M.D., and Mr. M. Neil Duxbury.

1 5. Pursuant to NRS 630.020, the “practice of medicine” means either (1) to
2 diagnose, treat, correct, prevent or prescribe for any human disease, ailment, injury, infirmity,
3 deformity or other condition, physical or mental, by any means or instrumentality, including, but
4 not limited to, the performance of an autopsy, or (2) to apply principles or techniques of medical
5 science in the diagnosis or the prevention of any such conditions, or (3) to offer, undertake,
6 attempt to do or hold oneself out as able to do any of the acts described in (1) and (2).

7 6. On September 5, 2017, the Board was notified in writing by Respondent’s previous
8 supervising physician that such required supervision was terminated on July 1, 2017, and that
9 Respondent was therefore not currently supervised by a physician licensed and approved by the
10 Board.

11 7. On September 6, 2017, the Board’s Chief of Investigations, Pamela Castagnola,
12 personally presented to Respondent’s medical office, Modern Medical & Wellness, located at 911
13 N. Buffalo Drive, Suite 113, Las Vegas, NV 89128-8397, where Respondent was actively
14 performing medical services. Ms. Castagnola personally notified Respondent that she had no
15 supervising physician, and that she was prohibited, pursuant to NAC 630.375(2), from performing
16 medical services until there was a supervising physician for her practice that was licensed and
17 approved by the Board. At that time, Ms. Castagnola served Respondent with a written Order to
18 produce all records of her supervision for the previous twenty-four (24) months pertaining to the
19 program of supervision maintained by her supervising physician (Order for Records).

20 8. On September 6, 2017, Respondent informed Ms. Castagnola, verbally and in
21 writing via letter dated the same day, that Respondent would cease practicing and comply with the
22 IC’s Order for Records.

23 9. On September 11, 2017, Respondent wrote a prescription to Patient A for
24 Phentermine, a Schedule IV controlled substance pursuant to NAC 453.540. Patient A’s true
25 identity is not disclosed herein to protect her privacy as a purported patient of Respondent, but is
26 disclosed in the Patient Designation served upon Respondent, along with a copy of this Complaint
27 (Patient Designation).

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1 10. On September 26, 2017, Respondent wrote a prescription to Patient B for
2 Phentermine, a Schedule IV controlled substance pursuant to NAC 453.540. Patient B's true
3 identity is not disclosed herein to protect her privacy as a purported patient of Respondent, but is
4 disclosed in the Patient Designation.

5 11. On September 27, 2017, Respondent wrote a prescription to Patient C for
6 Testosterone Pellets and a "trocar" pellet insertion kit. Testosterone is a Schedule III controlled
7 substance pursuant to NAC 453.530. Patient C's true identity is not disclosed herein to protect his
8 privacy as a purported patient of Respondent, but is disclosed in the Patient Designation.
9 Testosterone pellets must be inserted beneath the skin to be effective; implantation of testosterone
10 pellets is an invasive medical procedure² taking several minutes, wherein the skin of the upper hip
11 or buttocks is cleaned, then injected with a local anesthetic; a small incision is made and
12 testosterone pellets are placed under the skin with an instrument called a trocar; typically, 10 to 12
13 pellets are implanted during the procedure. Respondent's handwritten prescription for the
14 testosterone pellets notes that they are for "Office Use."

15 12. On information and belief, Respondent implanted the aforementioned Testosterone
16 Pellets into Patient C.

17 13. On September 28, 2017, Respondent was personally served the Suspension Order
18 by Board Investigators Donald Andreas and Kim Friedman.

19 14. On September 28, 2017, Respondent wrote a prescription to Patient D for Adderall,
20 a Schedule II controlled substance pursuant to NAC 453.520. Patient D's true identity is not
21 disclosed herein to protect his privacy as a purported patient of Respondent, but is disclosed in the
22 Patient Designation.

23 15. On October 4, 2017, Respondent wrote a prescription to Patient E for Phentermine,
24 a Schedule IV controlled substance pursuant to NAC 453.540. Patient E's true identity is not
25 disclosed herein to protect her privacy as a purported patient of Respondent, but is disclosed in the
26 Patient Designation.

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² Pursuant to NAC 449.9733, and "invasive procedure" is a medical procedure involving entry into the human body by puncture or incision or by insertion of an instrument.

1 16. On October 10, 2017, Respondent wrote a prescription to Patient F for
2 Testosterone Cypionate, a Schedule III controlled substance pursuant to NAC 453.530. Patient
3 F's true identity is not disclosed herein to protect his privacy as a purported patient of Respondent,
4 but is disclosed in the Patient Designation.

5 17. As of this writing, Respondent has not produced any records in response to the IC's
6 Order for Records.

7 18. On information and belief, Respondent's actions described herein above were
8 knowing and willful.

9 19. Respondent is performing medical services, including the prescription of controlled
10 substances, (1) without supervision, in violation of NAC 630.375(2), (2) in direct contradiction to
11 her prior written statement to the Board on September 6, 2017, in violation of NRS 630.304(1),
12 and (3) in patent violation of the Board's Suspension Order, in direct violation of
13 NRS 630.3065(2)(a). Respondent is also knowingly and willfully failing to comply with the IC's
14 lawful Order for Records, in violation of NRS 630.3065(2)(a).

15 **Count I**

16 **NRS 630.306(1)(b)(1): Deceptive Conduct**

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

19 21. NRS 630.306(1)(b)(1) provides that engaging in any conduct which is intended to
20 deceive is grounds for disciplinary action or denying licensure.

21 22. Respondent engaged in conduct intended to deceive when she informed the Board
22 in writing on September 6, 2017, that she would cease practicing medicine until obtaining proper
23 supervision from an approved physician, and then proceeded to perform medical services without
24 supervision as described herein.

25 23. By reason of the foregoing, Respondent is subject to discipline by the Nevada State
26 Board of Medical Examiners as provided in NRS 630.352.

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1 **Count II**

2 **NRS 630.306(1)(b)(2): Violation of Standards of Practice**

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

5 25. NRS 630.306(1)(b)(2) provides that engaging in any conduct which the Board has
6 determined is a violation of the standards of practice established by regulation of the Board is
7 grounds for disciplinary action or denying licensure.

8 26. Pursuant to NAC 630.375(2), a physician assistant shall not perform medical
9 services without supervision from a supervising physician licensed and approved by the Board.

10 27. Respondent performed medical services without supervision when, on September
11 11, 2017, Respondent wrote a prescription to Patient A for Phentermine, a Schedule IV controlled
12 substance pursuant to NAC 453.540.

13 28. By reason of the foregoing, Respondent is subject to discipline by the Nevada State
14 Board of Medical Examiners as provided in NRS 630.352.

15 **Count III**

16 **NRS 630.306(1)(b)(2): Violation of Standards of Practice**

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

19 30. NRS 630.306(1)(b)(2) provides that engaging in any conduct which the Board has
20 determined is a violation of the standards of practice established by regulation of the Board is
21 grounds for disciplinary action or denying licensure.

22 31. Pursuant to NAC 630.375(2), a physician assistant shall not perform medical
23 services without supervision from a supervising physician licensed and approved by the Board.

24 32. Respondent performed medical services without supervision when, on September
25 26, 2017, Respondent wrote a prescription to Patient B for Phentermine, a Schedule IV controlled
26 substance pursuant to NAC 453.540.

27 33. By reason of the foregoing, Respondent is subject to discipline by the Nevada State
28 Board of Medical Examiners as provided in NRS 630.352.

1 **Count IV**

2 **NRS 630.306(1)(b)(2): Violation of Standards of Practice**

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

5 35. NRS 630.306(1)(b)(2) provides that engaging in any conduct which the Board has
6 determined is a violation of the standards of practice established by regulation of the Board is
7 grounds for disciplinary action or denying licensure.

8 36. Pursuant to NAC 630.375(2), a physician assistant shall not perform medical
9 services without supervision from a supervising physician licensed and approved by the Board.

10 37. Respondent performed medical services without supervision when, on September
11 27, 2017, Respondent wrote a prescription to Patient C for Testosterone Pellets and a "trocar kit"
12 pellet insertion kit, and/or when Respondent implanted the aforementioned Testosterone Pellets
13 into Patient C.

14 38. By reason of the foregoing, Respondent is subject to discipline by the Nevada State
15 Board of Medical Examiners as provided in NRS 630.352.

16 **Count V**

17 **NRS 630.306(1)(b)(2): Violation of Standards of Practice**

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

20 40. NRS 630.306(1)(b)(2) provides that engaging in any conduct which the Board has
21 determined is a violation of the standards of practice established by regulation of the Board is
22 grounds for disciplinary action or denying licensure.

23 41. Pursuant to NAC 630.375(2), a physician assistant shall not perform medical
24 services without supervision from a supervising physician licensed and approved by the Board.

25 42. Respondent performed medical services without supervision when, on September
26 28, 2017, Respondent wrote a prescription to Patient D for Adderall, a Schedule II controlled
27 substance pursuant to NAC 453.520.

28 43. By reason of the foregoing, Respondent is subject to discipline by the Nevada State

1 Board of Medical Examiners as provided in NRS 630.352.

2 **Count VI**

3 **NRS 630.306(1)(b)(2): Violations of Standards of Practice**

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

6 45. NRS 630.306(1)(b)(2) provides that engaging in any conduct which the Board has
7 determined is a violation of the standards of practice established by regulation of the Board is
8 grounds for disciplinary action or denying licensure.

9 46. Pursuant to NAC 630.375(2), a physician assistant shall not perform medical
10 services without supervision from a supervising physician licensed and approved by the Board.

11 47. Respondent performed medical services without supervision when, on October 4,
12 2017, Respondent wrote a prescription to Patient E for Phentermine, a Schedule IV controlled
13 substance pursuant to NAC 453.540.

14 48. By reason of the foregoing, Respondent is subject to discipline by the Nevada State
15 Board of Medical Examiners as provided in NRS 630.352.

16 **Count VII**

17 **NRS 630.3065(2)(a): Knowing and Willful Failure to Comply with Board Order**

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

20 50. NRS 630.3065(2)(a) provides that knowingly or willfully failing to comply with
21 regulation, subpoena or order of the Board is grounds for disciplinary action or denying licensure.

22 51. Respondent knowingly and willingly failed to comply with the IC's Suspension
23 Order when, on October 4, 2017, Respondent wrote a prescription to Patient E for Phentermine, a
24 Schedule IV controlled substance pursuant to NAC 453.540.

25 52. By reason of the foregoing, Respondent is subject to discipline by the Nevada State
26 Board of Medical Examiners as provided in NRS 630.352.

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1 **Count VIII**

2 **NRS 630.306(1)(b)(2): Violations of Standards of Practice**

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

5 54. NRS 630.306(1)(b)(2) provides that engaging in any conduct which the Board has
6 determined is a violation of the standards of practice established by regulation of the Board is
7 grounds for disciplinary action or denying licensure.

8 55. Pursuant to NAC 630.375(2), a physician assistant shall not perform medical
9 services without supervision from a supervising physician licensed and approved by the Board.

10 56. Respondent performed medical services without supervision when, on October 10,
11 2017, Respondent wrote a prescription to Patient F for Testosterone Cypionate, a Schedule III
12 controlled substance pursuant to NAC 453.530.

13 57. By reason of the foregoing, Respondent is subject to discipline by the Nevada State
14 Board of Medical Examiners as provided in NRS 630.352.

15 **Count IX**

16 **NRS 630.3065(2)(a): Knowing and Willful Failure to Comply With Board Order**

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

19 59. NRS 630.3066(2)(a) provides that knowingly or willfully failing to comply with
20 regulation, subpoena or order of the Board is grounds for disciplinary action or denying licensure.

21 60. Respondent knowingly and willingly failed to comply with the IC's Suspension
22 Order when, on October 10, 2017, Respondent wrote a prescription to Patient F for Testosterone
23 Cypionate, a Schedule III controlled substance pursuant to NAC 453.530.

24 61. By reason of the foregoing, Respondent is subject to discipline by the Nevada State
25 Board of Medical Examiners as provided in NRS 630.352.

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Count X

NRS 630.3065(2)(a): Knowing and Willful Failure to Comply with Board Order

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

63. NRS 630.3066(2)(a) provides that knowingly or willfully failing to comply with regulation, subpoena or order of the Board is grounds for disciplinary action or denying licensure.

64. Respondent knowingly and willingly failed to comply with the IC's Order for Records.

65. By reason of the foregoing, Respondent is subject to discipline by the Nevada State Board of Medical Examiners as provided in NRS 630.352.

WHEREFORE, the Investigative Committee prays:

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

2. That the Nevada State Board of Medical Examiners set a time and place for a formal hearing after holding an Early Case Conference pursuant to NRS 630.339(3);

3. That the Nevada State Board of Medical Examiners determine the sanctions it will impose if it finds Respondent violated the Medical Practice Act;

4. That the Nevada State Board of Medical Examiners make, issue and serve upon the Respondent, in writing, its findings of fact, conclusions of law and order, in writing which shall include the sanctions imposed; and

5. That the Nevada State Board of Medical Examiners take such other and further action as may be just and proper in these premises.

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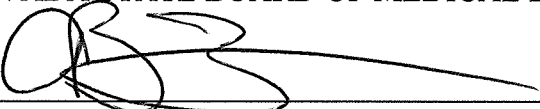
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DATED this 13 day of November, 2017.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

Robert Kilroy, Esq., General Counsel
Aaron Bart Fricke, Esq., Deputy General Counsel
Donald K. White, Esq., Deputy General Counsel
Attorneys for the Investigative Committee

OFFICE OF THE GENERAL COUNSEL
Nevada State Board of Medical Examiners
1105 Terminal Way #301
Reno, Nevada 89502
(775) 688-2559

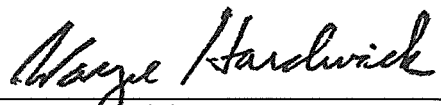
VERIFICATION

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STATE OF NEVADA)
 : ss.
COUNTY OF WASHOE)

Wayne Hardwick, 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 he authorized the foregoing Complaint against the Respondent herein; that he has read the foregoing Complaint; and based upon information discovered during the course of the investigation into a complaint against Respondent, he believes the allegations and charges in the foregoing Complaint against Respondent are true, accurate and correct.

Dated this 13th day of November, 2017.



Wayne Hardwick, M.D.

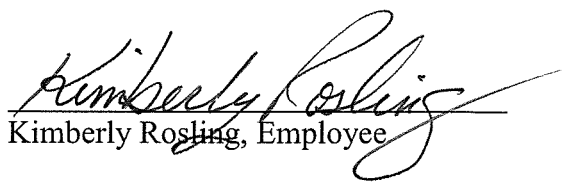
CERTIFICATE OF SERVICE

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I hereby certify that I am employed by the Nevada State Board of Medical Examiners and that on the 13th day of November, 2017, I served a file-stamped copy of the COMPLAINT, PATIENT DESIGNATION and FINGERPRINT INFORMATION, via USPS e-certified return receipt mail (9171 9690 0935 0040 5783 75) to the following:

Angela Lorenzo, PA
911 North Buffalo Road, Suite 113
Las Vegas, NV 89128

DATED this 13th day of November, 2017.


Kimberly Rosling, Employee