

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 30 2017

NEVADA STATE BOARD OF
MEDICAL EXAMINERS

By: _____

9
10 **FIRST AMENDED COMPLAINT**

11 The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners
12 (Board) hereby issues this First Amended 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., Mr. M. Neil Duxbury, and Aury Nagy, M.D.

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. Pursuant to NRS 630.311(1), the IC must review each complaint made against a
8 licensee and conduct an investigation to determine if there is a reasonable basis for the complaint.
9 The IC may issue orders to aid its investigation, including, but not limited to, compelling a
10 licensee to appear before the IC.

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

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

24 9. To date, Respondent has failed to respond in any way to the First Order for
25 Records.

26 10. Also on September 6, 2017, Respondent informed Ms. Castagnola, verbally and in
27 writing via letter dated the same day, that Respondent would cease practicing and comply with the
28 IC’s First Order for Records.

1 11. Also on September 6, 2017, pursuant to a separate investigation of Respondent's
2 alleged conduct related to BME Investigative Case No. 17-17442, the IC issued an Order to
3 Produce Health Care Records for the patient at issue from January 1, 2010, through September 6,
4 2017 (Second Order for Records). Respondent was ordered to respond to the Second Order for
5 Records within 21 days of service. The Second Order for Records was sent, along with an
6 Allegation Letter and Custodian of Records Affidavit, to Respondent via regular U.S.P.S. first-
7 class mail on September 6, 2017, to her office on record with the Board: 911 N. Buffalo Drive,
8 Suite 113, Las Vegas, NV 89128-8397.

9 12. Respondent did not respond to the Second Order for Records within 21 days as
10 ordered. Accordingly, on September 29, 2017, the Second Order for Records was sent again,
11 along with the original Allegation Letter and Custodian of Records Affidavit, to Respondent via
12 U.S.P.S. first-class mail to her office on record with the Board: 911 N. Buffalo Drive, Suite 113,
13 Las Vegas, NV 89128-8397.

14 13. Respondent again did not respond to the Second Order for Records. Accordingly,
15 on October 13, 2017, the Second Order for Records was sent a third time, along with the original
16 Allegation Letter and Custodian of Records Affidavit, this time to Respondent via U.S.P.S.
17 certified mail. The certified mailing was confirmed delivered to and signed for by the Respondent
18 on October 24, 2017.

19 14. To date, Respondent has failed to respond in any way to the Second Order for
20 Records.

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

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

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

13 18. On information and belief, Respondent implanted the aforementioned testosterone
14 pellets into Patient C.

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

19 20. On October 4, 2017, Respondent wrote a prescription to Patient E for Phentermine,
20 a Schedule IV controlled substance pursuant to NAC 453.540. Patient E’s true identity is not
21 disclosed herein to protect her privacy as a purported patient of Respondent, but is disclosed in the
22 Patient Designation.

23 21. On October 5, 2017, Respondent was personally served the Suspension Order by
24 Board Investigators Donald Andreas and Kim Friedman.

25 22. On October 10, 2017, Respondent wrote a prescription to Patient F for
26 Testosterone Cypionate, a Schedule III controlled substance pursuant to NAC 453.530. Patient
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² Pursuant to NAC 449.9733, an “invasive procedure” is a medical procedure involving entry into the human body by
puncture or incision or by insertion of an instrument.

1 F's true identity is not disclosed herein to protect his privacy as a purported patient of Respondent,
2 but is disclosed in the Patient Designation.

3 23. The prescribing of controlled substances to Patients A through F as described
4 herein, constitute the practice of medicine as defined in NRS 630.020.

5 24. On information and belief, Respondent's actions described herein above were
6 knowing and willful.

7 25. Respondent is practicing medicine, including, but not limited to, prescribing of
8 controlled substances, (1) without supervision, in violation of NAC 630.375(2), (2) in direct
9 contradiction to her prior written statement to the Board on September 6, 2017, in violation of
10 NRS 630.306(1)(b)(1), and (3) in patent violation of the Board's Suspension Order, in direct
11 violation of NRS 630.3065(2)(a). Also, Respondent, after being personally served with the IC's
12 lawful First Order for Records, is also knowingly and willfully failing to comply with said Order,
13 in violation of NRS 630.3065(2)(a). Respondent is also knowingly and willfully failing to comply
14 with the IC's lawful Second Order for Records, this time after two regular mailings and a certified
15 delivery of said Order, again in violation of NRS 630.3065(2)(a).

16 **Count I**

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

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

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

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

26 29. By reason of the foregoing, Respondent is subject to discipline by the Nevada State
27 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 30. All of the allegations in the above paragraphs are hereby incorporated as if fully set
4 forth herein.

5 31. 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 32. 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 33. 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 34. 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 35. All of the allegations in the above paragraphs are hereby incorporated as if fully set
18 forth herein.

19 36. 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 37. 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 38. 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 39. 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 40. All of the allegations in the above paragraphs are hereby incorporated as if fully set
4 forth herein.

5 41. 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 42. 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 43. 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 44. 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 45. All of the allegations in the above paragraphs are hereby incorporated as if fully set
19 forth herein.

20 46. 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 47. 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 48. 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.

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

3 **Count VI**

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

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

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

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

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

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

17 **Count VII**

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

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

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

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

26 58. Respondent performed medical services without supervision when, on October 10,
27 2017, Respondent wrote a prescription to Patient F for Testosterone Cypionate, a Schedule III
28 controlled substance pursuant to NAC 453.530.

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

3 **Count VIII**

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

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

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

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

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

14 **Count IX**

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

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

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

20 66. Respondent knowingly and willingly failed to comply with the IC's First Order for
21 Records, after being personally served with said Order.

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

24 **Count X**

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

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

28 69. NRS 630.3065(2)(a) provides that knowingly or willfully failing to comply with

1 regulation, subpoena or order of the Board is grounds for disciplinary action or denying licensure.

2 70. Respondent knowingly and willingly failed to comply with the IC's Second Order
3 for Records, after two regular mailings and a certified delivery of said Order.

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

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

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

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

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

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

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

19 DATED this 30 day of November, 2017.

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

23 By: _____

24 Robert Kilroy, Esq., General Counsel
25 Aaron Bart Fricke, Esq., Deputy General Counsel
26 Donald K. White, Esq., Deputy General Counsel
27 Attorneys for the Investigative Committee
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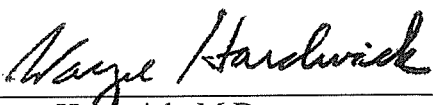
VERIFICATION

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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 authorized the foregoing First Amended Complaint against the Respondent herein; that he has read the foregoing First Amended 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 First Amended Complaint against Respondent are true, accurate and correct.

Dated this 30th day of November, 2017.



Wayne Hardwick, M.D.