


For Public
BEFORE THE BOARD OF MEDICAL EXAMINERS
OF THE STATE OF NEVADA

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In The Matter of Charges and
Complaint Against
TERESA CHARNIGA, M.D.
Respondent.

NO. Case No. 08-8567-1

FILED 22 August 2008


EXECUTIVE DIRECTOR

COMPLAINT

The Investigative Committee of the Nevada State Board of Medical Examiners (Board), composed of Charles N. Held, M.D., Cindy Lamerson, M.D., and Jean Stoess, M.A., by and through Edward O. Cousineau, Deputy General Counsel for the Board, having a reasonable basis to believe that Teresa Charniga, 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 was granted a license to practice medicine in the state of Nevada on March 17, 1990, and at all times alleged herein, was actively licensed by the Board, pursuant to the provisions of Chapter 630 of the Nevada Revised Statutes.

2. On May 29, 2003, the Board received Respondent's Application for Registration Renewal of License for the 2003-2005 biennial registration period. Question 6 of the Application asked: Have you ever been investigated for, charged with, convicted of, or plead guilty or nolo contendere to any offense or violation of any federal, state or local law...which is a misdemeanor, gross misdemeanor, or felony, excluding any minor traffic offense (driving or in control of a motor vehicle while under the influence of any chemical substance is **not** considered a **minor traffic offense**)...?

Respondent answered in the negative.

1 3. On June 7, 2005, the Board received Respondent's Application for Registration Renewal
2 of License for the 2005-2007 biennial registration period. Question 6 of the Application asked: Have
3 you ever been investigated for, charged with, convicted of, or plead guilty or nolo contendere to any
4 offense or violation of any federal, state or local law...which is a misdemeanor, gross misdemeanor, or
5 felony, excluding any minor traffic offense (driving or in control of a motor vehicle while under the
6 influence of any chemical substance is **not** considered a **minor traffic offense**)...? Respondent again
7 answered in the negative.

8 4. Precedent to the filing of this Complaint, the Board became aware that Respondent was
9 arrested for driving under the influence (DUI) on January 19, 2003. Further, Court records obtained by
10 the Board indicate that on October 16, 2003, Respondent appeared in the Las Vegas Justice Court,
11 where she pled guilty to the charge of DUI, and that the adjudication of guilt withheld by the Court
12 contingent upon Respondent completing various court ordered conditions. On January 14, 2004, the
13 Court amended the DUI charge, and found Respondent guilty of reckless driving, based upon her
14 compliance with its' previously ordered terms.

15 5. Based upon the foregoing, Respondent failed to report to the Board the arrest referenced
16 in paragraph 4 in either her 2003-2005 or 2005-2007 Registration Renewal of Licensure Applications.
17 Section 630.301(4) of the Nevada Revised Statutes provides that obtaining, maintaining or renewing or
18 attempting to obtain, maintain or renew a license to practice medicine by bribery, fraud or
19 misrepresentation or by any false, misleading, inaccurate or incomplete statement is grounds for
20 disciplinary action.

21 6. Respondent violated NRS 630.304(1) when she failed to disclose to the Board the arrests
22 referenced in paragraph 4 and is subject to discipline by the Board as provided in NRS 630.352.

23 WHEREFORE, the Investigative Committee prays:

24 1. That the Board fix a time and place for a formal hearing;

25 2. That the Board give Respondent notice of the charges herein against him, the time and place
26 set for the hearing, and the possible sanctions against him;

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

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

3 DATED this 22nd day of August, 2008.

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5 By: _____


6 Edward O. Cousineau
7 Attorney for the Investigative Committee of the
8 Nevada State Board of Medical Examiners
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VERIFICATION

STATE OF NEVADA)
 : ss.
COUNTY OF DOUGLAS)

Charles N. Held, M.D., having been duly sworn, hereby deposes and states under penalty of perjury that he is the Chairman of the Investigative Committee of the Nevada State Board of Medical Examiners that authorized the Complaint against the Respondent herein; that he has read the foregoing Complaint; and that based upon information discovered in the course of the investigation into a complaint against Respondent, he believes that the allegations and charges in the foregoing Complaint against Respondent are true, accurate, and correct.

Dated this 22nd day of August, 2008.



Charles N. Held, M.D.

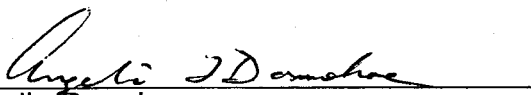
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1 **CERTIFICATE OF MAILING**

2 I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on
3 the 22nd day of August 2008, I served a file copy of the COMPLAINT, NOTICE OF
4 PREHEARING/HEARING & copy of appointment letter by mailing via USPS certified return receipt
5 to the following:

6
7 Teresa Charniga, M.D.
8 3121 S. Maryland Parkway, Ste. #216
9 Las Vegas, NV 89109

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11 Dated this 22nd day of August 2008.

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13 
14 Angelia Donohoe
15 Legal Assistant

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