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

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In The Matter of Charges and

Complaint Against

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MARIA CORAZON OROZCO REGALADO, M.D.,

Respondent.

FILED JAN 2 0 2012 NEVADA STATE BOARD OF MEDICAL EXAMINERS

Case No. 12-12597-1

## **COMPLAINT**

The Investigative Committee of the Nevada State Board of Medical Examiners ("Board"), 12 13 composed at the time of filing of Theodore Β. Berndt, M.D., Chairman. Valerie J. Clark, BSN, RHU, LUTCF, Member, and Michael J. Fischer, M.D., Member, by and 14 15 through Bradley O. Van Ry, Deputy General Counsel, having a reasonable basis to believe that Maria Corazon Orozco Regalado, M.D., hereinafter referred to as "Respondent," has violated the 16 17 provisions of NRS Chapter 630, hereby issues its formal Complaint, stating the Investigative Committee's charges and allegations, as follows: 18

Respondent, is currently licensed in active status (License No. 8966), and has been
 so licensed since April 27, 1999 by the Nevada State Board of Medical Examiners pursuant to the
 provisions of Chapter 630 of the Nevada Revised Statutes.

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2. On April 9, 2011, a person in North Las Vegas, Nevada died as a result of cosmetic surgery performed by two persons not licensed to practice medicine in the state of Nevada. The persons performing the surgery were Ruben Mattallana-Galvas and Carmen Torres-Sanchez. Both Mr. Mattallana-Galvas and Ms. Torres-Sanchez plead guilty to involuntary manslaughter on August 4, 2011 as a result of their actions causing the death of the patient.

27 3. Respondent had, on at least one occasion, received medical treatment from
28 Mr. Mattallana-Galvas. Additionally, Respondent had a previous filial, personal and/or separate

professional relationship with either Mr. Mattallana-Galvas and/or Ms. Torres-Sanchez. As a
 result, Respondent knew, or should have known, that neither Mr. Mattallana-Galvas and/or Ms.
 Torres-Sanchez were licensed physicians in the state of Nevada.

4 4. Unfortunately, Respondent never reported the unlicensed medical practices of both
5 of the foregoing to the medical board or any criminal authority at anytime.

Count I

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

6. Nevada Revised Statute Section 630.305(1)(e) provides that aiding, assisting, employing or advising, directly or indirectly, any unlicensed person to engage in the practice of medicine contrary to the provisions of this chapter or the regulations of the Board is grounds for initiating discipline against a licensee.

7. By reason of the foregoing, Respondent is subject to discipline by the Nevada State Board of Medical Examiners as provided in Section 630.352 of the Nevada Revised Statutes.

### Count II

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

9. Nevada Revised Statute Section 630.3065(3) provides that the willful failure to
perform a statutory or other legal obligation imposed upon a licensed physician is grounds for
initiating discipline against a licensee.

21 10. By reason of the foregoing, Respondent is subject to discipline by the Nevada State
22 Board of Medical Examiners as provided in Section 630.352 of the Nevada Revised Statutes.

### Count III

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

12. Nevada Revised Statute Section 630.3062(6) provides that the failure to report any
person the licensee knows, or has reason to know, is in violation of the provisions of this chapter
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or the regulations of the Board within 30 days after the date the licensee knows or has reason to 1 2 know of the violation is grounds for initiating discipline against a licensee.

13. By reason of the foregoing, Respondent is subject to discipline by the Nevada State Board of Medical Examiners as provided in Section 630.352 of the Nevada Revised Statutes.

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 Section 630.339 of the Nevada Revised Statutes 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 what sanctions it determines to impose if it determines there has been a violation or violations of the Medical Practice Act (Nevada Revised Statutes Chapter 630) committed by Respondent; and

4. That the Nevada State Board of Medical Examiners make, issue and serve on Respondent its findings of facts, conclusions of law and order, in writing, that includes 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.

DATED this day of January, 2012.

**INVESTIGATIVE COMMITTEE OF THE** NEVADA STATE BOARD OF MEDICAL EXAMINERS

Bradley O. Van Ry, Esq. Deputy General Counsel and Attorney for the Investigative Committee

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#### VERIFICATION

SS.

Dated this 20<sup>th</sup> day of January, 2012.

STATE OF NEVADA 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.

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

**OFFICE OF THE GENERAL COUNSEL** 

Aleodure B. Berndt, M.D.

	1	CERTIFICATE OF MAILING
(775) 688-2559	2	I hereby certify that I am employed by Nevada State Board of Medical Examiners and
	3	that on 20 <sup>th</sup> day of January 2012; I served a file copy of the COMPLAINT, Settlement Letter &
	4	Fingerprint information, via USPS e-certified mail to the following:
	5	Maria Corazon Orozco Regalado, M.D.
	6	1321 S. Rainbow Blvd., Ste. 101 Las Vegas, NV 89146
	7	
	8	Dated this 20 <sup>th</sup> day of January 2012.
(775) 688-2559	9	
	10	1 a to to
	11	Angelia L. Donohoe
	12	Legal Assistant
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