

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

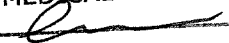
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5 **In the Matter of Charges and Complaint**
6 **Against**
7 **COREY DANIEL BUENO, CRT,**
8 **Respondent.**

Case No. 19-36900-1

FILED

APR 11 2019

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), by and through Aaron Bart Fricke, Esq., Deputy General Counsel and attorney for the IC,
13 having a reasonable basis to believe that Corey Daniel Bueno, CRT (Respondent) violated the
14 provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC)
15 Chapter 630 (collectively, the Medical Practice Act), hereby issues its Complaint, stating the IC's
16 charges and allegations as follows:

17 1. Respondent was at all times relative to this Complaint a certified respiratory therapist
18 holding an active license to practice respiratory therapy in the State of Nevada (License No.
19 RC1776). Respondent was originally licensed by the Board on March 25, 2010, which license was
20 summarily suspended on or about April 10, 2019.

21 2. On or about December 18, 2017, Respondent was ordered (Order), pursuant to Nevada
22 Administrative Code (NAC) 630.550, to comply with the recommendations of the evaluation
23 performed by Larry Espadero, LADC, of Professional Recovery Network (PRN), at Montevista
24 Hospital in Las Vegas.

25 3. Respondent was personally served with the Order on December 19, 2017.

26 4. On November 20, 2018, Respondent was involved in a motor vehicle collision. He
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28 ¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time this formal Complaint was authorized for filing, was composed of Board members Rachakonda Prabhu, M.D., Chairman, Victor M. Muro, M.D., and Ms. April Mastroluca.

1 admitted to officers at the scene that he had smoked marijuana twenty (20) minutes prior to driving
2 and he had taken one Percocet at 5:00 p.m. He was arrested. No drug test was included in the arrest
3 report.

4 5. On November 28, 2018, Mr. Espadero informed the Board of the arrest after having
5 spoken to Respondent. Pursuant to the Order and his contract with PRN, Respondent was instructed
6 to meet with Mr. Espadero that same day for further counseling and treatment.

7 6. As of the filing of this Complaint, Respondent has not complied with those
8 instructions, or made contact with Mr. Espadero regarding his arrest or his intentions with the PRN
9 program.

10 7. Based on the foregoing, Respondent has not complied with the Order.

11 8. On December 10, 2018, Mr. Espadero informed the Board he was terminating
12 Respondent's contract with PRN for lack of attendance and failure to follow conditions of his contract.

13 9. On information and belief, Respondent is unable to practice respiratory therapy with
14 reasonable skill and safety because of illness, a mental or physical condition or the use of alcohol,
15 drugs, narcotics or any other substance.

16 **COUNT I**

17 **NRS 630.306(1)(a)**

18 **(Inability to Practice Respiratory Therapy With Reasonable Skill and Safety)**

19 10. All of the allegations contained in the above paragraphs are hereby incorporated by
20 reference as though fully set forth herein.

21 11. NAC 630.540(23) provides that violating any provision that would subject a
22 practitioner of medicine to discipline pursuant to NRS 630.301 to 630.3065, inclusive, or NAC
23 630.230, is grounds for disciplinary action against a respiratory therapist.

24 12. NRS 630.306(1)(a) provides that the inability to practice with reasonable skill and
25 safety because of illness, a mental or physical condition or the use of alcohol, drugs, narcotics or
26 any other substance is grounds for initiating disciplinary action.

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

5. That the Board take such other and further action as may be just and proper in these premises.

DATED this 10 day of April, 2019.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

Aaron Bart Fricke, Esq., Deputy General Counsel
Attorney for the Investigative Committee

