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

\* \* \* \* \*

**In the Matter of Charges and  
Complaint Against  
PATRICIA MORALES, M.D.,  
Respondent.**

**Case No. 19-9829-1**

**FILED**

**FEB 26 2019**

**NEVADA STATE BOARD OF  
MEDICAL EXAMINERS**

By: 

**COMPLAINT**

The Investigative Committee (IC)<sup>1</sup> of the Nevada State Board of Medical Examiners (Board) hereby issues this Complaint (Complaint) against Patricia Morales M.D. (Respondent), a licensed physician in Nevada. After investigating this matter, the IC has a reasonable basis to believe that Respondent has violated provisions of Nevada Revised Statute (NRS) Chapter 630 and the Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical Practice Act). The IC alleges the following facts:

1. Respondent was licensed by the Board, pursuant to the provisions of the Medical Practice Act, on September 19, 1987, and is currently licensed in active status (License No. 5570).
2. Patient A's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.
3. On March 9, 2012, Patient A presented to Respondent complaining of left hand pain. Patient A has a history of bilateral carpal tunnel syndrome and Patient A previously had undergone an open right carpal tunnel release in Arizona. EMG (Electromyography) studies demonstrated a left carpal tunnel syndrome. Patient A's initial examination showed no

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<sup>1</sup> The IC, at the time this formal Complaint was authorized for filing, consisted of Theodore B. Berndt, M.D., Chairman, Michael J. Fischer, M.D., and Ms. Valerie J. Clark.

1 thenaratrophy and an unequivocal Tinel's sign, but a positive result for the Phalen's test on the left  
2 hand.

3 4. On September 19, 2012, Respondent took Patient A to the Great Basin Surgical  
4 Center. Respondent placed Patient A's left wrist in the hyperflexion and entered the carpal tunnel  
5 on the radial side. Respondent lacerated Patient A's medial nerve.

6 5. On October 15, 2012, Respondent documented Patient A's pain and swelling, with  
7 continued complaints of numbness in his index finger, with a positive Tinel's sign, and prescribed  
8 amitriptyline and placed him in physical therapy.

9 6. On November 28, 2012, Patient A was seen by an Idaho-licensed M.D., who noted  
10 during his examination that Patient A had left median nerve numbness in the median nerve  
11 distribution and severe point tenderness at the carpal ligament area. Patient A's thumb and fingers  
12 were moderately swollen and there were well-healed incisions at the mid-palm and the wrist-palm  
13 junction; the scars were consistent with a Choi technique.

14 7. Previous to the preparation of this Complaint, the Board solicited the services of an  
15 independent medical expert (IME) to review Patient A's medical records and the care provided to  
16 such patient by Respondent. This IME opined that Respondent's care of Patient A violated the  
17 Medical Practice Act due to her acts and omissions when rendering care to Patient A, and further  
18 opined that it was below the standard of care to lacerate the nerve and that the carpal tunnel should  
19 not be entered on the radial side because this procedural entry approach would put the median  
20 nerve at risk. There were reported complications for endoscopic carpal tunnel release. IME noted  
21 the literature indicates that the median nerve is located radial to the palmaris longus tendon and  
22 proper entry should be made on the ulnar side of the tendon.

23 **Count I**

24 **(Malpractice)**

25 8. All of the allegations contained in the above paragraphs are hereby incorporated by  
26 reference as though fully set forth herein.


27 9. NRS 630.301(4) provides that malpractice of a physician is grounds for initiating  
28 disciplinary action against a licensee.



- 1           3.       That the Board determine what sanctions to impose if it finds and concludes that
- 2 there has been a violation or violations of the Medical Practice Act committed by Respondent;
- 3           4.       That the Board make, issue and serve on Respondent its findings of fact,
- 4 conclusions of law and order, in writing, to include the sanctions to be imposed; and,
- 5           5.       That the Board take such other and further action as may be just and proper in these
- 6 premises.

7           DATED this 26 day of February, 2019.

8                               INVESTIGATIVE COMMITTEE OF THE  
9                               NEVADA STATE BOARD OF MEDICAL EXAMINERS

10                              By:   
11                              Robert Kilroy, Esq.  
12                              General Counsel  
13                              Attorney for the Investigative Committee

VERIFICATION

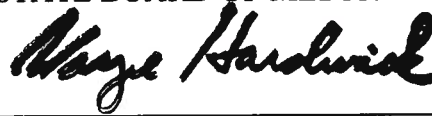
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STATE OF NEVADA            )  
  : ss.  
COUNTY OF WASHOE        )

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 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, he believes the allegations and charges in the foregoing Complaint against Respondent are true, accurate and correct.

Dated this 26<sup>th</sup> day of February, 2019.

INVESTIGATIVE COMMITTEE OF THE NEVADA  
STATE BOARD OF MEDICAL EXAMINERS



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Wayne Hardwick, M.D., Chairman

CERTIFICATE OF MAILING

1  
2 I hereby certify that I am employed by Nevada State Board of Medical Examiners and that  
3 on 26<sup>th</sup> day of February, 2018, I served a file-stamped copy of the COMPLAINT via USPS  
4 e-certified return receipt mail to the following:

5 Patricia Morales, M.D.  
6 c/o Edward J. Lemons, Esq.  
7 Lemons, Grundy & Eisenberg  
8 6005 Plumas Street, Suite 300  
9 Reno, Nevada 89519

10 Dated this 26<sup>th</sup> day of February, 2019.

11 Sheri L. Quigley  
12 Sheri L. Quigley, Legal Assistant  
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