NV STATE BOARD OF
OSTEOPATHIC MEDICINE
JUN 04 2018
FILED

BEFORE THE NEVADA STATE BOARD OF OSTEOPATHIC MEDICINE

IN THE MATTER OF: **CHRISTOPHER VARONA, D.O.,** **License No. DO1903,** **Respondent.**	**Case No. AD1806001** **COMPLAINT FOR DISCIPLINARY ACTION**

The Nevada State Board of Osteopathic Medicine, by and through its Investigating Board Member, Swadeep Nigam, hereby makes the following complaint for disciplinary action against Christopher Varona, D.O. (License No. DO1903), pursuant to NRS 633.541(3) and 622A.300(1). This complaint is made and based upon the following facts and causes of action.

I.

Christopher Varona, D.O., is licensed by the Board to practice osteopathic medicine in Nevada (License No. DO1903). Dr. Varona is board certified in family practice/general practice/family medicine. Dr. Varona's address in the Board's records is: 2071 San Joaquin Hills Road, Newport Beach, California 92620. Dr. Varona is known to the Board's office to use the e-mail address: christophervarona@hotmail.com.

II.

On November 11, 2017, Dr. Varona submitted his application to renew his Nevada license via the Board's online renewal process. In his renewal application, Dr. Varona indicated that he had completed at least 35 hours of continuing medical education (CME) in 2017.

III.

Dr. Varona's renewal application was randomly selected by the Board's staff to be audited for compliance with NRS 633.471(3) and NAC 633.250. In furtherance of the audit, on February 7, 2018, the Board's Executive Director, Sandra Reed, sent Dr. Varona a letter to his last known address at 2071 San Joaquin Hills Road, Newport Beach, California 92620, notifying him that he was chosen for the audit. The letter was assumed to be received because it has not been returned to the Board's office.

Nevada State Board of Osteopathic Medicine
2275 Corporate Circle, Suite 210 · Henderson, NV 89074
(702) 732 - 2147

IV.

Because the Board received no response to its letter to Dr. Varona dated February 7, 2018, on March 30, 2018 the Board's Licensing Specialist, Tammy Sine, sent Dr. Varona an e-mail informing him that he had been selected as part of the Board's random CME auditing process and stated the potential consequences for his failure to respond to the Board. Dr. Varona did not reply to the e-mail.

V.

On April 2, 2018, Ms. Reed sent Dr. Varona a letter via certified mail reminding him that he had been selected as part of the Board's random CME auditing process and stated potential consequences for his failure to respond to the Board. The letter was sent to Dr. Varona's last known address at 2071 San Joaquin Hills Road, Newport Beach, California 92620 and was received on April 12, 2018 as evidenced by the signature of Nattely Morales on the return card. Dr. Varona did not respond or reply to the letter.

VI.

On April 19, 2018, Ms. Sine sent Dr. Varona an e-mail informing him again that he had been selected as part of the Board's random CME auditing process and again stated the potential consequences for his failure to respond to the Board. Dr. Varona did not reply to the e-mail.

VII.

On May 7, 2018, Ms. Reed left a message on Dr. Varona's cell phone, and sent Dr. Varona an e-mail informing him that the Board has been attempting to reach him, as he had been selected as part of the Board's random CME auditing process. Ms. Reed also stated the potential consequences for his failure to respond to the Board. Dr. Varona did not reply to the phone call or e-mail.

FIRST CAUSE OF ACTION

VIII.

In failing to prove that he had obtained any of the requisite CME for renewal of his license in the 2017 renewal period, Dr. Varona violated Nevada Revised Statutes (NRS) 633.131(1)(a) and NRS 633.511(1)(a) and/or NRS 633.511(1)(g) and NRS 633.471.

Nevada State Board of Osteopathic Medicine
2275 Corporate Circle, Suite 210 · Henderson, NV 89074
(702) 732 - 2147

Wherefore, it is hereby requested that appropriate discipline be entered against Dr. Varona based upon this Complaint pursuant to NRS 633.651.

Signed this 4 day of June, 2018.

By _____
Swadeep Nigam
Investigating Board Member

NOTICE OF HEARING AND
STATEMENT OF RESPONDENT'S RIGHTS

As the Respondent in this action, you have the following rights:

1. A hearing regarding this matter will be held before Hearing Officer Jill Greiner at the following date and place:

   Monday, July 16, 2018 at 1:00 p.m., and possibly soon thereafter.

   Board Conference Room
   2275 Corporate Circle, Suite 210
   Henderson, Nevada 89074

   The intent of the hearing of this matter is to determine whether the allegations made against you in the above Complaint have been proven by a preponderance of the evidence, and if so, what discipline is appropriate. All documents you wish to file in this matter must be filed with the Board's office located at 2275 Corporate Circle, Suite 210, Henderson, Nevada 89074.

2. You may appear at the hearing of this matter. You may be represented by your counsel of choice. The hearing shall be conducted at an open and public hearing of the Board and shall be conducted in conformance with NRS chapters 233B, 622A, and 633 and NAC chapter 633, including your right to present testimony and evidence in support of your case and your right to cross-examine witnesses presented by the Board's staff.

3. Pursuant to NRS 622A.320(1), you may file an Answer to the above Complaint in this matter. To do so, you must file your Answer in writing with the Board's office within 20 days of your receipt of the above Complaint. Your failure to timely file an Answer to the Complaint may be deemed by the Hearing Officer or the Board to be an admission to the contents of the Complaint.

5. You may request that the Board issue subpoenas to compel the attendance of witnesses or the production of evidence at the hearing of the matter pursuant to NRS 633.281.

6. Should you choose not to appear at the hearing of the matter, the Board may enter a default against you and still proceed with the hearing of the matter in your absence pursuant to NRS 622A.350.

7. You may seek to negotiate a settlement regarding this matter. If you desire to discuss a potential settlement of the matter, you may contact Louis Ling, Board Counsel, at (775) 233-9099 or at louisling@me.com.

Nevada State Board of Osteopathic Medicine
2275 Corporate Circle, Suite 210 · Henderson, NV 89074
(702) 732 - 2147

BEFORE THE NEVADA STATE BOARD OF OSTEOPATHIC MEDICINE

IN THE MATTER OF:	) Case No.: AD1806001
CHRISTOPHER VARONA, D.O.	)
License No. DO1903	)
RESPONDENT.	)

NV STATE BOARD OF OSTEOPATHIC MEDICINE
JUN 04 2018
FILED

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of June, 2018, I served a copy of the ABOVE Notice with attachment upon the parties to this matter, via U.S. Postal Service, postage thereon prepaid, at their last known address on file with this Board.

Christopher Varona, D.O.

An employee of the Nevada State Board of Osteopathic Medicine

Nevada State Board of Osteopathic Medicine
2275 Corporate Circle, Suite 210 · Henderson, NV 89074
(702) 732 - 2147