CONSENT AGREEMENT AND ORDER

The Commonwealth and Respondent stipulate as follows in settlement of the above-captioned case.

1. This matter is before the State Board of Medicine ("Board") pursuant to the Medical Practice Act, Act of December 20, 1985, P.L. 457, No. 112, as amended ("Act"), 63 P.S. §422.1 et seq.

2. At all relevant and material times, Natalya A. Medrano ("Respondent") held a license to practice medicine and surgery in the Commonwealth of Pennsylvania, license no. MD433937.

3. Respondent admits that the following facts are true:

   a. Respondent's license was active through December 31, 2012, but may be renewed upon the filing of the appropriate documentation and payment of the necessary fees.

   b. Respondent's current address is 300 Granello Avenue, Apt. 852, Coral Gables, FL 33146.
c. On or about February 27, 2015, the State of Florida, Department of Health, filed an Administrative Complaint in the matter of Department of Health, Petitioner v. Natalya Medrano, M.D., Respondent at Case No. 2014-08746.

d. A true and correct copy of the Administrative Complaint referenced in paragraph 3c is attached and incorporated as Exhibit A.

e. On or about June 18, 2015, the State of Florida, Department of Health, approved a Settlement Agreement in the matter of Department of Health, Petitioner v. Natalya Medrano, M.D., Respondent at Case No. 2014-08746.

f. A true and correct copy of the Settlement Agreement referenced in paragraph 3e is attached and incorporated as Exhibit B.

g. On or about August 17, 2015, the Florida Board of Medicine issued a Final Order in the matter of Department of Health, Petitioner v. Natalya Medrano, M.D., Respondent at Case No. 2014-08746.

h. A true and correct copy of the Final Order referenced in paragraph 3g is attached and incorporated as Exhibit C.

i. The Florida Board of Medicine ordered the Respondent to pay a fine of $5,000.00; and Respondent was ordered to complete continuing medical education and present a lecture/seminar on retained foreign body object, along with other terms and conditions.

4. Pursuant to the Act at 63 P.S. §422.41(4), the Board has the authority to impose disciplinary or corrective measures for Respondent having had disciplinary action taken by the proper licensing authority of another state against her license to practice the profession.
5. Intending to be legally bound, the participants consent to issuance of the following Order in settlement of this matter:

   a. Respondent had disciplinary action taken by the proper licensing authority of another state against her license to practice the profession.

   b. The Board is authorized to impose disciplinary and/or corrective action pursuant to the Act at 63 P.S. §422.41(4).

   c. Respondent shall pay a CIVIL PENALTY of $2500.00 by cashier’s check, certified check, U.S. Postal money order or attorney’s check, valid no less than 90 days from date of issuance and made payable to “Commonwealth of Pennsylvania.” Respondent shall return the full Civil Penalty with the signed Consent Agreement.

   ADMISSIBILITY OF CONSENT AGREEMENT IN FUTURE PROCEEDINGS

6. Respondent agrees that if Respondent is charged with a violation of an Act enforced by this Board in the future, this Consent Agreement and Order shall be admitted into evidence without objection in that proceeding.

   ACKNOWLEDGMENT OF RIGHT TO ATTORNEY

7. Respondent acknowledges that he is aware that he has the right to consult with, and/or be represented by, private legal counsel of Respondent’s choosing and at Respondent’s expense when reviewing, considering and accepting the terms of this Consent Agreement. To the extent that Respondent is not represented by legal counsel, Respondent has knowingly elected to proceed without the assistance of legal counsel.
WAIVER OF CLAIM OF COMMINGLING AND OTHER CONSTITUTIONAL CLAIMS

8. Respondent expressly waives any constitutional rights and issues, such as commingling of prosecutorial and adjudicative functions by the Board or its counsel, which may arise or have arisen during the negotiation, preparation and/or presentation of this Consent Agreement. Respondent specifically agrees that if the Board rejects this agreement, it may assume that the facts and averments as alleged in this Consent Agreement are true and correct for the limited purpose of recommending a sanction, based on those assumed facts that would be acceptable to the Board before hearing the case. In the event that the Board does assume the facts and averments as alleged in this Consent Agreement are true for purposes of making a recommendation as to an acceptable sanction, such action shall not constitute commingling of prosecutorial and adjudicative functions by the Board or its counsel, and the Respondent expressly waives any constitutional rights and issues related to alleged commingling, bias, or violation of due process rights to have an unbiased and impartial adjudicator in any subsequent hearing. If a hearing is subsequently held, neither this Consent Agreement nor the proposed terms of settlement may be admitted into evidence and any facts, averments, and allegations contained in the Consent Agreement must be proven at hearing unless otherwise separately stipulated. This paragraph is binding on the participants even if the Board does not approve this Consent Agreement.

NO MODIFICATION OF ORDER

9. Respondent agrees, as a condition of entering into this Consent Agreement, not to seek modification at a later date of the Stipulated Order adopting and implementing this Consent Agreement without first obtaining the express written concurrence of the Prosecution Division.
AGREEMENT NOT BINDING ON OTHER PARTIES

10. The Office of General Counsel has approved this Consent Agreement as to form and legality; however, this Consent Agreement shall have no legal effect unless and until the Board issues the stipulated Order.

EFFECT OF BOARD'S REJECTION OF CONSENT AGREEMENT

11. Should the Board not approve this Consent Agreement, presentation to and consideration of this Consent Agreement and other documents and matters by the Board shall not prejudice the Board or any of its members from further participation in the adjudication of this matter. This paragraph is binding on the participants even if the Board does not approve this Consent Agreement.

ENTIRE AGREEMENT

12. This agreement contains the whole agreement between the participants; provided however, that the captions printed in the various provisions of this agreement are for ease of reading only and are not to be interpreted as forming any part of this agreement. There is no other terms, obligations, covenants, representations, statements or conditions, or otherwise, of any kind whatsoever concerning this agreement.

VERIFICATION OF FACTS AND STATEMENTS

13. Respondent verifies that the facts and statements set forth in this Consent Agreement are true and correct to the best of Respondent's knowledge, information and belief. Respondent understands that statements in this Consent Agreement are made subject to the criminal penalties of 18 Pa.C.S.A. §4904 relating to unsworn falsification to authorities.
Keith E. Bashore, Esq.
Prosecuting Attorney
Department of State

DATED: 11/24/15

Natalya A. Medrano, M.D.
Respondent

DATED: 11/10/15

Jennifer A. Nachamkin, Esq.
Attorney for Respondent

DATED: 11/17/15