IN THE COURT OF APPEALS OF THE STATE OF NEW MEXICO

NELLIE GONZALES,

Plaintiff/Appellant,

vs.

ELDO FREZZA, M.D.,

Defendant/Appellee,

and PRESBYTERIAN HEALTH PLAN, INC., a New Mexico Domestic For-profit Corporation,

Defendants.

COA No. 32,606
Santa Fe County
CV-2010-03827

Appeal from the District Court of the First Judicial District
Honorable Sarah M. Singleton, District Judge

PLAINTIFF-APPELLANT'S REPLY BRIEF
ORAL AGRUMENT REQUESTED

JERRY TODD WERTHEIM
ROXIE P. RAWLS-DE SANTIAGO
SAMUEL C. WOLF
ELIZABETH C. CLIFFORD
Post Office Box 2228
Santa Fe, New Mexico 87504-2228
(505) 982-0011

Attorneys for Plaintiff/Appellant

TABLE OF CONTENTS

INTRODUCTION/SUMMARY OF FACTS 1

STANDARD OF REVIEW 1

ARGUMENT 2

I. New Mexico has personal jurisdiction over Defendant/Appellee 2

A. Specific personal jurisdiction is proper because the facts of the present suit arise directly out of Defendant/Appellee's specific contacts with New Mexico 3

1. The place of the wrong rule supports the exercise of specific personal jurisdiction over Defendant/Appellee 7

2. Defendant/Appellee's systematic and continuous contacts with the State of New Mexico render him subject to general personal jurisdiction 9

3. Traditional notions of fair play and substantial justice are not offended by exercising jurisdiction over Defendant/Appellee Frezza 11

4. Jurisdictional discovery is necessary and remand should be granted 14

CONCLUSION AND RELIEF REQUESTED 15

REQUEST FOR ORAL ARGUMENT 15

CERTIFICATE OF SERVICE 16

TABLE OF AUTHORITIES

Cases - New Mexico

Chandler-McPhail v. Duffey, 194 P.3d 434 5

Cronin v. Sierra Medical Center, 2000-NMCA-082, 129 N.M. 521, 10 P.3d 845 ..... 1, 4, 8

Doe v. Roman Catholic Diocese of Boise, Inc., 1996-NMCA-057, 121 N.M. 738, 918 P. 2d 17 (Ct. App. 1996) 2, 11

Montano v. Frezza, D-202-CV-2011-10851 on appeal as COA No. 32,403 ... 12, 14

Sam v. Sam, 2006-NMSC-022, 139 N.M. 474, 134 P. 3d 761 (2006) 13

Santa Fe Technologies, Inc. v. Argus Networks, Inc., 2002 NMCA 030, 131 N.M. 772, 42 P.3d 1221 ..... 3, 8, 9, 10

Tarin's Inc. v. Tinley, 2000 NMCA 048, 129 N.M. 185, 3 P.3d 680 ..... 6, 7

Torres v. State, 119 N.M. 609, 894 P. 2d 386 (1995) 13

Valley Wide Health Servs., Inc. v. Graham, 106 N.M. 71, 738 P.2d 1316 (1987) 4

Zavala v. El Paso County Hospital District, 2007-NMCA-149, 143 N.M. 36, 172 P. 3d 173 ..... 2, 3, 9, 11

Cases - Federal Court

Beh v. Ostergard, 657 F. Supp. 173 (D.N.M. 1987) 8

Cubbage v. Merchant, 744 F.2d 665 (9th Cir. App. 1984) 13

Cases - U.S. Supreme Court

Rush v. Savchuk, 444 U.S. 320, 100 S.Ct. 571 (1980) 5

Cases - Other Jurisdictions

La Mourea v. Rhude, 209 Minn. 53, 295 N.W. 304 (1940) 6

Statutes

NMSA 1978, § 38-1-16 (1971) 2

Texas Tort Claims Act 11

Other Authorities

17A Am.Jur.2d Contract § 421 (1991) 7

INTRODUCTION/SUMMARY OF FACTS

The Complaint filed on November 5, 2010 arose from a bariatric surgery that was negligently performed by Defendant/Appellee. (RP 000001 – 00009, RP 000026–000062, and RP 000071-000084) At the time of the surgery, Plaintiff/Appellant was employed by the State of New Mexico and received her health insurance through her employer. The State of New Mexico contracted with Presbyterian Health Plan, Inc. (Defendant Presbyterian) to administer the health insurance provided to Plaintiff/Appellant and other State employees. (RP 000038 – 000062). Defendant/Appellee Frezza is a surgeon licensed to practice medicine in New Mexico (RP 000111-000112 and RP 000163) and a provider with certain New Mexico insurers, including Lovelace and Defendant Presbyterian (RP 000111). Defendant Presbyterian specifically required Plaintiff/Appellant to see Defendant/Appellee in Texas for his medically necessary bariatric surgery. (TR 9:59:27 – 10:00:00).

STANDARD OF REVIEW

The standard of review for a dismissal based on lack of personal jurisdiction is well settled: it is a question of law, which is reviewed de novo by the Court of Appeals. Cronin v. Sierra Medical Center, 2000-NMCA-082, ¶ 10, 129 N.M. 521, 524, 10 P.3d 845, 848. (citations omitted). As the district court did not conduct an evidentiary hearing regarding jurisdiction, the standard of review mirrors that of a

summary judgment hearing and the pleadings, affidavits and submissions are viewed in a light most favorable supporting the existence of jurisdiction. Doe v. Roman Catholic Diocese of Boise, Inc., 1996-NMCA-057, 121 N.M. 738, 742, 918 P. 2d 17, 21 (Ct. App. 1996) (paragraphs not numbered).

ARGUMENT

I. New Mexico has personal jurisdiction over Defendant/Appellee.

The State of New Mexico can assert both specific and general jurisdiction over Defendant/Appellee because he has more than minimum contacts with the State of New Mexico and plaintiff's cause of action arises from those contacts. The long-arm statute allows state courts to assert jurisdiction over nonresident defendants who engage in enumerated acts including transaction of business or in the commission of a tort in New Mexico. NMSA 1978, § 38-1-16 (1971). New Mexico Courts have determined that a technical determination of acts which satisfy these categories is no longer necessary, requiring instead a determination that sufficient minimum contacts exist with New Mexico to satisfy due process. Zavala v. El Paso County Hospital District, 2007-NMCA-149, ¶ 10, 143 N.M. 36, 41, 172 P. 3d 173, 178. Thus, the focus in analyzing personal jurisdiction in New Mexico is on whether the defendant has the requisite minimum contacts with New Mexico to satisfy due process. Id.

A. Specific personal jurisdiction is proper because the facts of the present suit arise directly out of Defendant/Appellee's specific contacts with New Mexico.

Specific personal jurisdiction over a defendant exists when a defendant purposely establishes contact with New Mexico and plaintiff is harmed as a result of that contact. Zavala, 2007 NMCA at ¶ 12, 143 N.M. at 42, 172 P.3d at 179 (citations omitted). Under the strictly constitutional analysis required, the key to a finding of specific personal jurisdiction is whether the defendant could reasonably anticipate that he would be brought into court in New Mexico. Santa Fe Technologies, Inc. v. Argus Networks, Inc,, 2002 NMCA 030, ¶ 13 and ¶ 16, 131 N.M. 772, 779 and 781, 42 P.3d 1221, 1228 and 1231.

Defendant/Appellee's contacts with New Mexico which subject him to specific personal jurisdiction are: (1) He was a party to, and bound by the terms of an agreement with Defendant Presbyterian which funneled New Mexico patients to his doorstep (RP SP 000012 – SP 000059); (2) After being required by her insurer to see Defendant/Appellee for surgery in Texas, Plaintiff/Appellant returned to her home in New Mexico, where she developed substantial discomfort (RP 000076, ¶31); (3) After an additional procedure in Texas, Plaintiff/Appellant again returned to her home in New Mexico where she continued to suffer numerous additional complications. (RP 000076, ¶32); (4) when the pain became so unbearable it eventually resulted in her hospitalization in New Mexico and the discovery of a

tangled network of sutures in her gastric pouch and down the jejunal limb which were left by Defendant/Appellee (RP 000076, ¶33 and 35); and (5) Defendant/Appellee traveled to Santa Fe to meet with a least one other patient.

Defendant/Appellee does not dispute items 2, 3 or 4 but rather states simply that the "place of the wrong" argument should not be heard as it was not raised below. The "place of the wrong" was raised below. (RP 00143–00180, specifically RP 000151) As to item 5, Defendant/Appellee engages in semantics but does not deny that he actually met a patient in Santa Fe. Defendant/Appellee also asserts, without support from the record that all misrepresentations, follow-up care and concealment activities occurred in Texas. (Ans. Pg. 25). This is not what was alleged and misconstrues and misrepresents the facts. Further, this argument is falsely based on the precept that Plaintiff/Appellant voluntarily sought out the medical care of Defendant/Appellee. She did not: she was referred directly to Defendant/Appellee by her New Mexico insurance company, Defendant Presbyterian. Plaintiff/Appellant was not referred to TTPA or Texas Tech University Health Sciences Center. In this regard, the facts of this case are easily distinguished from Cronin and Valley Wide Health, where the defendant doctors were not subject to jurisdiction because the plaintiff voluntarily sought the care of the foreign doctor. Cronin v. Sierra Medical Center, 2000-NMCA-082, ¶ 10, 129 N.M. 521, 524, 10 P.3d 845, 848; Valley Wide Health Servs., Inc. v. Graham, 106

N.M. 71, 738 P.2d 1316 (1987). Indeed the circumstances here are much more like those described by the court in Chandler-McPhail v. Duffey:

> "Indeed, a 'referral' to an Affiliated Physician specialist under the EOC is much more than a recommendation. A Member has little choice, if any, about to whom he or she is referred, and, to remain covered by the EOC, a Member must obtain services from the specialist to whom he or she is referred. Thus, for all practical purposes, a referral to an Affiliated Physician specialist under the EOC forces a Member to obtain services from that particular specialist, who thereby benefits by competing for business among a large pool of Members created by the EOC who have strict limitations places on their option to select a specialist by the EOC." Chandler-McPhail v. Duffey, 194 P.3d 434, 439.

The court further states that but for the agreement between the physician and the insurance group, the physician would be unable to participate in the limited market. Id. The circumstances here are even more striking as Defendant/Appellee was the only bariatric surgeon that was in-network for Plaintiff/Appellant.

Finally, Defendant/Appellee attempts to argue in his Answer Brief that he had no relationship with Plaintiff/Appellant or Defendant Presbyterian and further that his only contact with New Mexico was through TTPA who contracted with Defendant Presbyterian. (Ans. Pg. 22) Defendant/Appellee's argument is based on Rush v. Savchuk, 444 U.S. 320, 100 S.Ct. 571 (1980). In Rush, the plaintiff attempted to assert *quasi in rem* jurisdiction the defendant through his insurance company, who also happened to be engaged in the state where the suit was filed. Id. The circumstances could not be more different here. Plaintiff/Appellant is

asserting jurisdiction over Defendant/Appellee based on his own contacts with New Mexico, not based on contacts through his insurance company. In addition, the record established that Defendant/Appellee and Defendant Presbyterian did have a direct relationship: he was a participating provider (RP 000111 - 000112, ¶ 4), and was credentialed through Defendant Presbyterian, (RP 000111-000112, ¶ 5) and bound by the agreement. The case, and likewise Defendant/Appellee's argument, in inapplicable to the current circumstance.

Further, this argument omits the obvious: Defendant/Appellee was directly bound by the terms of the agreement (RP SP 00006, ¶ 5, last sentence; SP 000012-SP 000059, specifically, pg. 6, ¶2.2). Indeed, Defendant/Appellee does not refute that he is bound by the terms of the agreement. Under well-established contract law the obligations of a contract are due only to those with whom it is made, that is to say with whom there is privity. See Tarin's Inc. v. Tinley, 2000 NMCA 048, ¶ 12, 129 N.M. 185, 190, 3 p.3d 680, 685. "Privity of contract has also been defined as 'the name for a legal relation arising from right and obligation,' or the 'legal relationship to the contract or its parties.'" Id., citing La Mourea v. Rhude, 209 Minn. 53, 295 N.W. 304, 307 (1940). In Tarin, a subcontractor filed a motion to dismiss claiming that the homeowner was not a party to the agreement. Tarin, 2000 NMCA at ¶11, 129 N.M. at 190, 3 P.3d at 685. There, in applying the same standard due in this case the Court found that dismissal was not appropriate

because the complaint contained allegations of privity and third-party beneficiary status. Tarin, 2000 NMCA at 15, 129 N.M. at 191, 3 P.3d at 686. In this case, the agreement itself shows that Defendant/Appellee is bound by the terms of the agreement and Defendant/Appellee does not dispute or refute that he is so bound or even that the agreement resulted in him receiving pecuniary gain from all the New Mexico patients that were referred to him. Instead, Defendant/Appellee argues that simply because he is bound does not mean that he is a party. "Generally, the obligation of contracts is limited to the parties making them." 17A Am.Jur.2d Contract § 421 (1991) The language and the clearly expressed intent of the parties included in the agreement show that Defendant/Appellee is obligated to follow the terms of the contract and as such he is either a party or in privity. As in Tarin, this Court should reverse the dismissal. Alternatively, because there is a clear factual dispute over whether Defendant/Appellee is a party to the agreement as well as the nature of the legal relationships between Defendant Presbyterian, Presbyterian Network, Inc., TTPA and Texas Tech University Health Services Center, Plaintiff/Appellant requests remand for additional evidentiary findings and discovery.

1. The place of the wrong rule supports the exercise of specific personal jurisdiction over Defendant/Appellee.

Defendant/Appellee argues that this Court should not consider the place of the wrong rule because it was never presented in the lower court.

Defendant/Appellee is incorrect. The argument was presented in Plaintiff/Appellant's Response, (RP 00143 – 00180, specifically RP 000151). A ruling in this regard was fairly invoked by the lower court. Where minimum contacts exist as they do here, the "place of the wrong" rule recognizes medical negligence occurring in other states as a tortious act occurring within New Mexico. See e.g. Cronin v. Sierra Medical Center, 129 N.M. 521, 10 P. 3d 845, ¶¶17-18 (2000) (injury occurred in New Mexico where health problems developed here following negligent treatment in Texas); Santa Fe Technologies, 2002 NMCA at ¶ 15 ("a tortious act can occur in New Mexico when the harmful act originates outside the state, but the injury occurs inside New Mexico); Beh v. Ostergard, 657 F. Supp. 173, 175-76 (D.N.M. 1987) (where complications developed in New Mexico following medical negligence in California, tortious action had occurred in New Mexico for purposes of long-arm statute).

In this case, the place of the wrong is New Mexico. Not only did Plaintiff/Appellant experience continuing pain and discomfort upon her return to New Mexico, but for years following the initial surgery, Defendant/Appellee continued to communicate with Plaintiff/Appellant regarding her medical condition, assuring her that the symptoms and additional required procedures were all normal thereby hiding his own negligence and preventing Plaintiff/Appellant from discovering it. Plaintiff/Appellant discovered Defendant/Appellee's

negligence in New Mexico after being hospitalized here. In addition, Plaintiff/Appellant has had substantial economic loss in the state of New Mexico as a result of the injuries sustained. See Santa Fe Technologies, 2002 NMCA at ¶ 15 (the economic loss is the injury which completes the tort in New Mexico). All this occurring in New Mexico, the court should assert jurisdiction over Defendant/Appellee who provided continuous negligent care to Plaintiff/Appellant as well as other New Mexico patients.

2. ***Defendant/Appellee's systematic and continuous contacts with the State of New Mexico render him subject to general personal jurisdiction.***

In addition to all the contacts that support specific personal jurisdiction, many additional contacts support general personal jurisdiction. Defendant/Appellee goes to great lengths to explain why each of the additional contacts are insufficient in their own right to support jurisdiction. However, general personal jurisdiction is based on the accumulation of all of Defendant/Appellee's contacts with New Mexico. Although the court will assess each in turn, the combination of a number of individually insufficient contacts can support a finding of personal jurisdiction. Zavala, 2007-NMCA-149, ¶16.

Most notable of the general contact is that Defendant/Appellee holds a medical license from the state of New Mexico. (RP 000111, ¶2). Although he argues in his Answer Brief that his license is expired, it is in fact set on "inactive" status. Additionally, the circumstances surrounding Defendant/Appellee's request

for a New Mexico license demonstrate that Defendant/Appellee intended to treat New Mexico patients, knew he was doing so, and should have reasonably anticipated being brought to New Mexico courts. Santa Fe Technologies, 2002 NMCA at ¶16, 131 N.N. at 781, 42 P3d at 1231. Plaintiff/Appellant has received a copy of Defendant/Appellee's New Mexico Medical Board file.[1] In his April 22, 2005 application, submitted before Plaintiff/Appellant's surgery, Defendant/Appellee states that he is requesting a New Mexico license because he has patients from New Mexico, it would better allow him to serve the population of New Mexico and further, would allow him to see patients who have trouble traveling to Texas. In addition, although Defendant/Appellee's license was set to expire July 2009, Defendant/Appellee instead requested that his license be held in "inactive" status, allowing reinstatement upon satisfaction of statutory requirements. The entire file was lodged with the district court and referred to herein because the information contained therein is crucial to establishing the circumstances before which Defendant/Appellee was licensed in New Mexico and further to show that Defendant/Appellee's statements in his Answer Brief that his license is expired is not truthful. Even today (8/23/13) the license still shows "inactive."

[1] The entire file was lodged with the district court pursuant to 12-209(D) and 12-212(C).

In addition to the medical license, Defendant/Appellee had a website that was designed to attract patients from New Mexico by listing Defendant/Appellee as a doctor licensed in New Mexico and contained patient testimonials of New Mexico patients. (RP 000163 - 000166), published a book, called "The Business of Surgery" which is available in New Mexico (excerpts at RP 000157 – 000162) and he owns property in the state of New Mexico. (RP 000167 – 000180). Contrary to Defendant/Appellee's assertion, the record contains evidence of each of these contacts. Because there was no evidentiary hearing held in the lower court, the pleadings, affidavits and submissions are viewed in a light most favorable supporting the existence of jurisdiction. Doe v. Roman Catholic Diocese of Boise, Inc., 1996-NMCA-057, 121 N.M. 738, 742, 918 P. 2d 17, 21 (Ct. App. 1996) (paragraphs not numbered). Together, they leave no doubt: Defendant/Appellee is subject to personal jurisdiction in New Mexico.

3. *Traditional notions of fair play and substantial justice are not offended by exercising jurisdiction over Defendant/Appellee Frezza.*

When, as here, minimum contacts are adequate to establish personal jurisdiction, a determination must be made whether the exercise of such jurisdiction would offend "traditional notions of fair play and substantial justice." Zavala, 2007 NMCA at ¶12, 143 N.M. at 42, 172 P. 3d at 179. In an effort to defeat this argument, Defendant/Appellee relies upon his stated position that he is a governmental actor and entitled to immunities and protections of the Texas Tort

Claims Act. (Ans. Pg. 27). The lower court did not rule on this matter and Defendant/Appellee states his position as if it were a matter of fact. Further, his arguments asking this court to consider or grant recognition to his status as a governmental actor is a request for comity. Although discussed below, the question of comity and its application to Defendant/Appellee is more fully addressed in a separate pending appeal that also involved Defendant/Appellee: Montano v. Frezza, et al, COA No. 32,403.

Defendant/Appellee argues that comity requires this Court to apply Texas law. According to him, under Texas law, Defendant/Appellee is immune from suit as a doctor-employee of the Texas Tech University Health Sciences Center. Application of Texas law would deny plaintiff a cause of action against Defendant/Appellee altogether, where New Mexico law would undoubtedly grant him one. New Mexico public policy in favor of holding Defendant/Appellee personally responsible for his professional negligence, where Texas never would, again militates for denial of the motion.

However, contrary to Defendant/Appellee's argument, this Court need not even apply the "place of the wrong" rule should it find that application of the rule would violate New Mexico public policy, as it plainly would here. Comity does not require a forum state to extend immunity to other states sued in its courts, and the forum state should only extend immunity as a matter of comity if doing so will

not violate the forum state's public policies. See Sam v. Sam, 2006-NMSC-022, ¶¶13, 26-29, 139 N.M. 474, 134 P. 3d 761 (2006) (holding that New Mexico public policy overrode comity and dictated that New Mexico law applied). The "place of the wrong" rule "is not utilized . . . if such application would violate New Mexico public policy." Torres v. State,119 N.M. 609, 613, 894 P. 2d 386 (1995). This general principle applies expansively: "in order to refuse to honor the laws of another state, a forum state only needs to declare that the other state's law would violate its own legitimate public policy. To require more would allow the citizens of one state to determine the public policy of another." Id. at ¶16. Thus, even if Defendant/Appellee were able to establish an interpretation of any New Mexico rule under which Texas law could apply (which is impossible here), Texas law could only be applied if it would not violate the public policy of New Mexico. Comparison of New Mexico and Texas law in this area, shows that application of Texas law would violate New Mexico public policy in substantive ways, and New Mexico law must therefore be applied.

New Mexico's interest and public policy considerations should also be considered. This state has a manifest interest in protecting its citizens against the tortious injury of health care providers who solicit and derive a substantial number of patients and revenue from the state. Cubbage v. Merchant, 744 F.2d 665, 671 (9th Cir. App. 1984). Where a surgeon has caused significant injury to numerous

New Mexico citizens, including the State's own employees, but relies on the protection of Texas law to hide from liability, the public policy of New Mexico is directly implicated and supports a finding of personal jurisdiction here, permitting the New Mexico citizen who was directly injured as a result of Defendant/Appellee's arrangement with Presbyterian to seek redress in the courts of his own state. Thus, these factors also mandate a finding of personal jurisdiction over Defendant/Appellee.

4. Jurisdictional discovery is necessary and remand should be granted.

The district court denied Plaintiff/Appellant's request for jurisdictional discovery based on the timing of the request. Several extraordinary circumstances existed: Defendant/Appellee filed his motions to dismiss and replies without including the agreement relied upon by the court in its final ruling. Defendant/Appellee had filed identical motions in Montano v. Frezza, D-202-CV-2011-10851 on appeal as COA No. 32,403, which were heard on July 12, 2012 and denied on August 24, 2012. Subsequently, Defendant/Appellee filed supplemental exhibits with the agreement only eighteen days before the hearing on the motion to dismiss. The Court had not ruled on the motion to supplement or to seal the records prior to the actual hearing on the motion to dismiss. Indeed, the court did not hear the motions for supplementing and sealing the record until after the motion to dismiss hearing. These are extraordinary circumstances:

Plaintiff/Appellant could not have reasonably anticipated that the court would allow Defendant/Appellee to rely on documents submitted pending a motion to seal, in open court. It is manifestly unjust to allow Defendant/Appellee to use the agreement both as a shield from liability and as a method to advocate for his position against jurisdiction prior to ruling on its form of use in the court. Remand is appropriate.

CONCLUSION AND RELIEF REQUESTED

Plaintiff/Appellant's cause of action arises from both the transaction of business in New Mexico and the commission of a tortious act in New Mexico, therefore, New Mexico's long arm statute is satisfied, and this Court has personal jurisdiction over Defendant/Appellee Frezza. Under the standard appropriate for analysis of the question at this stage, Plaintiff/Appellant has met his burden of establishing a prima facie case that Defendant/Appellee has minimum contacts with the state of New Mexico and that the constitutional requirements of due process are met. This Court should overturn the decision of the district court and hold that Defendant/Appellee is subject to specific personal jurisdiction in the state of New Mexico. In the alternative, this Court should remand this case for the conduct of jurisdictional discovery.

REQUEST FOR ORAL ARGUMENT:

Pursuant to Rule 12-213(C) NMRA, Plaintiff/Appellant requests oral arguments in this matter. Oral arguments would be helpful to a resolution in this matter as there are currently three pending appeals related to Defendant/Appellee in which cross-arguments of issues raised in separate appeals are being argued in each appeal. Oral argument would allow for more clarification of the cross-over of issues.

Respectfully submitted,

JONES, SNEAD, WERTHEIM
& CLIFFORD, P.A.
Attorneys for Plaintiff/Appellant

By: Roxie De Santiago
JERRY TODD WERTHEIM
ROXIE P. RAWLS De SANTIAGO
SAMUEL C. WOLF
ELIZABETH C. CLIFFORD
P.O. Box 2228
Santa Fe, New Mexico 87504-2228
(505) 982-0011

CERTIFICATE OF SERVICE

It is hereby certified that on the 23rd day of August, 2013, a true copy of the foregoing Plaintiff/Appellant's Reply Brief was served by first-class mail, postage prepaid on:

William P. Slattery
Dana S. Hardy
Zachary T. Taylor
Hinkle, Hensley, Shanor & Martin, LLP
P.O. Box 2068
Santa Fe, New Mexico 87504

Remo Gay
Melissa Brown
Brown & Gay, P.C.
3810 Osuna NE #1
Albuquerque, NM 87109

Roxie De Santiago

ROXIE P. RAWLS De SANTIAGO