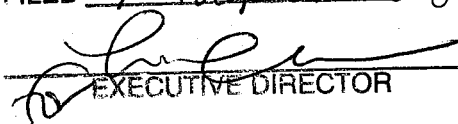


BEFORE THE BOARD OF MEDICAL EXAMINERS
OF THE STATE OF NEVADA

In The Matter of Charges and
Complaint Against
MARIBEL MONROE, M.D.
Respondent.

Case No. 08-12142-1
NO. _____
FILED 4 August 2008

EXECUTIVE DIRECTOR

COMPLAINT

The Investigative Committee of the Nevada State Board of Medical Examiners, composed of Charles N. Held, M.D., Chairman, Cindy Lamerson, M.D., Member, and Ms. Jean Stoess, M.A., Member by and through Edward O. Cousineau, Deputy General Counsel for the Nevada State Board of Medical Examiners, having a reasonable basis to believe that Maribel Monroe, M.D., hereinafter referred to as "Respondent," has engaged in conduct that is grounds for discipline pursuant to the provisions of Nevada Revised Statutes (NRS) Chapter 630, hereby alleges, charges and complains against said Respondent as follows:

1. Respondent is licensed in active status to practice medicine in the state of Nevada, and at all times alleged herein, was so licensed by the Nevada State Board of Medical Examiners, pursuant to the provisions of Chapter 630 of the Nevada Revised Statutes.

2. Patient A was a forty-seven-year-old-year-old female at the time of events at issue. Her true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient Designation served on Respondent along with a copy of this Complaint.

3. On September 8, 2003, Respondent performed a total abdominal hysterectomy on Patient A. A post-operative CT-scan of Patient A's pelvis showed fluid in her pericolic gutters. Patient A was subsequently discharged to home on September 14, 2003.

4. On September 23, 2003, Patient A presented to Respondent for a post-operative check without complaint. On October 8, 2003, Patient A presented to Respondent with complaints of clear

1 vaginal fluid leakage. Respondent's examination of Patient A showed an opening in Patient A's vaginal
2 cuff. Respondent performed a surgical repair of Patient A's vaginal cuff on October 11, 2003.

3 5. On October 12, 2003, Patient A underwent testing, which indicated a pelvic abscess. An
4 exploratory laparotomy to remove Patient A's pelvic abscess was accomplished that same day without
5 event.

6 6. After this surgical procedure, Patient A developed a postoperative ileus. Various
7 specialists were consulted to assist with Patient A's treatment course. On October 29, 2003, an
8 intravenous pyelogram was performed which showed an injury to Patient A's right ureter. Thereafter,
9 Patient A underwent a right-sided urethral reconstruction to correct the previously discovered ureter
10 injury.

11 **COUNT I**

12 7. All of the allegations in the above paragraphs are incorporated herein as if set forth in full.
13 Section 630.301(4) of the Nevada Revised Statutes provides that malpractice, defined as the failure to
14 use the reasonable knowledge, skill and expertise ordinarily used in similar circumstances, is grounds
15 for discipline.

16 8. Respondent committed malpractice in the course of providing care and treatment to
17 Patient A, when she failed to timely and accurately diagnose an injury to Patient A's right ureter, and is
18 therefore subject to discipline by the Nevada State Board of Medical Examiners as provided in
19 NRS 630.352.

20 WHEREFORE, the Investigative Committee prays that the Nevada State Board of Medical
21 Examiners conduct a hearing on the Complaint herein as provided by statute, find and determine that
22 Respondent has violated one or more provisions of the Medical Practice Act (NRS Chapter 630), enter
23 findings of fact, conclusions of law, and an order imposing sanctions upon Respondent according to
24 NRS 630.352 and take such other and further action as may be just and proper in these premises.

25 DATED this 4th day of August, 2008.

26
27 By: _____

Edward O. Cousineau
Attorney for the Investigative Committee of the
Nevada State Board of Medical Examiners

1 VERIFICATION

2 STATE OF NEVADA)
3 : ss.
4 COUNTY OF DOUGLAS)

5 Charles N. Held, M.D., having been duly sworn, hereby deposes and states under penalty of
6 perjury that he is the Chairman of the Investigative Committee of the Nevada State Board of Medical
7 Examiners that investigated the complaint against Respondent herein; that he has read the foregoing
8 Complaint; and that based upon the results of the Investigative Committee's investigation into a complaint
9 against Respondent, the allegations and charges in the foregoing Complaint against Respondent are true,
10 accurate and correct.

11 Dated this 4th day of August, 2008.


12 
13 _____
14 CHARLES N. HELD, M.D.

1 **CERTIFICATE OF MAILING**

2 I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on
3 the 4th day of August 2008, I served a file copy of the COMPLAINT, NOTICE OF
4 PREHEARING/HEARING, PATIENT DESIGNATION & copy of appointment letter by mailing via
5 USPS certified return receipt to the following:

6
7 Maribel Monroe, M.D.
8 3150 N. Tenaya Way, Ste. 590
9 Las Vegas, NV 89128

10 Dated this 4th day of August 2008.
11

12
13 
14 _____
15 Angelia Donohoe
16 Legal Assistant
17
18
19
20
21
22
23
24
25
26
27
28