

1 **BEFORE THE BOARD OF MEDICAL EXAMINERS**
2 **OF THE STATE OF NEVADA**

3 * * * * *

4 **In The Matter of Charges and**)
5 **Complaint Against**)
6 **V. GRIGORYEV GRIGG, M.D.,**)
7)
8 **Respondent.**)
9 _____)

Case No. 10-10569-1

FILED

FEB 22 2010

**NEVADA STATE BOARD OF
MEDICAL EXAMINERS**

10 **COMPLAINT**

11 The Investigative Committee of the Nevada State Board of Medical Examiners, composed
12 of Benjamin J. Rodriguez, M.D., Mr. Van V. Heffner, and Beverly A. Neyland, M.D., by and
13 through Edward Cousineau, General Counsel for the Nevada State Board of Medical Examiners,
14 having a reasonable basis to believe that Victor Grigoryev Grigg, M.D., hereinafter referred to as
15 "Respondent," has violated the provisions of NRS Chapter 630, hereby issues its formal Complaint,
16 stating the Investigative Committee's charges and allegations, as follows:

17 1. Respondent was actively-licensed to practice medicine in the state of Nevada on
18 August 4, 1994, and at all times alleged herein, was so licensed by the Nevada State Board of
19 Medical Examiners, pursuant to the provisions of Chapter 630 of the Nevada Revised Statutes.

20 2. Patient A, whose true identity is not disclosed herein to protect her privacy, but is
21 disclosed in the Patient Designation served on Respondent along with a copy of this Complaint,
22 underwent paravaginal and enterocele repair related to a diagnosis of pelvic organ prolapse on
23 April 25, 2006.

24 3. Subsequent review of the medical records related to Patient A's surgical treatment
25 by Respondent show a serious lack of adequate or accurate documentation and detail to
26 reconstruct the facts of the actual operative care provided to Patient A. For example, after Patient
27 A underwent the initial surgical procedure, Patient A was returned to the operating room for a
28 second surgical procedure, where medical records indicate that "stents were placed in both

OFFICE OF THE GENERAL COUNSEL

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1 occluded ureters.” This documentation is in contravention of language in the original operative
2 note prepared by Respondent which indicated that both ureteric orifices were functioning
3 properly at the time of the initial surgery. Of most import, there is no dictation or operative note
4 prepared by Respondent that documents that Patient A even underwent the second surgical
5 procedure. Moreover, Patient A’s discharge summary, which was prepared by Respondent,
6 indicates that Patient A refused a blood transfusion prior to discharge, yet review of the nurses
7 notes indicate that Patient A actually received two units of packed red blood cells prior to her
8 discharge.

9 4. Section 630.3062(1) of the Nevada Revised Statutes (NRS) provides that failure to
10 maintain timely, legible, accurate and complete medical records relating to the diagnosis,
11 treatment and care of a patient, is grounds for initiating disciplinary action.

12 5. Respondent violated NRS 630.3062(1) when he failed to properly maintain medical
13 records related to Patient A and is subject to discipline by the Nevada State Board of Medical
14 Examiners as provided in NRS 630.352.

15 **WHEREFORE**, the Investigative Committee prays:

16 1. That the Nevada State Board of Medical Examiners fix a time and place for a formal
17 hearing;

18 2. That the Nevada State Board of Medical Examiners give Respondent notice of the
19 charges herein against him, the time and place set for the hearing, and the possible sanctions against
20 him;

21 3. That the Board determine what sanctions it deems appropriate to impose for the
22 violation committed by Respondent; and

23 4. That the Board make, issue and serve on Respondent its findings of facts,
24 conclusions of law and order, in writing, that includes the sanctions imposed.

25 DATED this 22nd day of February, 2010.

26
27 By: _____

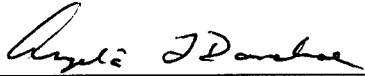
28 Edward Cousineau
Attorney for the Investigative Committee of the
Nevada State Board of Medical Examiners

CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 22nd day of February 2010, I served a file copy of the COMPLAINT, PATIENT DESIGNATION, Original Fingerprint information, ORIGINAL SETTLEMENT, WAIVER AND CONSENT AGREEMENT, by mailing via USPS certified return receipt mail to the following:

V. Grigoryev Grigg, M.D.
7500 Smoke Ranch Rd., Suite 200
Las Vegas, NV 89128

Dated this 22nd day of February 2010.



Angelia L. Donohoe
Legal Assistant