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

\* \* \* \* \*

**In the Matter of Charges and** )  
)  
**Complaint Against** )  
)  
**CHRISTOPHER T. PATIN, M.D.,** )  
)  
**Respondent.** )

**Case No. 13-12350-1**

**FILED**

**APR 30 2013**

**NEVADA STATE BOARD OF  
MEDICAL EXAMINERS**

By: 

**COMPLAINT**

The Investigative Committee of the Nevada State Board of Medical Examiners (Board), composed at the time of filing of Benjamin J. Rodriguez, M.D., Chairman, Beverly A. Neyland, M.D., Member, and Donna A. Ruthe, Member, by and through Erin L. Albright, Esq., Deputy General Counsel and attorney for the Investigative Committee, having a reasonable basis to believe that Christopher T. Patin, M.D. (Respondent), violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical Practice Act), hereby issues its formal Complaint, stating the Investigative Committee's charges and allegations as follows:

1. Respondent is currently licensed in active status (License No. 9873), and has been so licensed by the Board since July 9, 2001, pursuant to the provisions of the Medical Practice Act.

2. Patient A was an eighty-six (86)-year-old female at the time of the incident in question. Her true identity is not disclosed in this Complaint to protect her identity, but her identity is disclosed in the Patient Designation served on Respondent contemporaneously with a copy of this Complaint.

///

1           3.       On or about April 11, 2008, Patient A was hospitalized and treated for both  
2 congestive heart failure and hypertension. Patient A remained hospitalized until April 14, 2008.  
3 During Patient A's hospital stay, diagnostic tests were performed, which evidenced the patient's  
4 renal function was impaired.

5           4.       On or about April 14, 2008, Patient A was discharged from the hospital and  
6 ordered to take five (5) milligrams (mg) of Enalapril, an angiotensin converting enzyme inhibitor,  
7 twice a day.

8           5.       On or about April 17, 2008, Patient A presented to Respondent to establish care as  
9 her primary care physician and to follow-up on the patient's prior hospitalization. Respondent  
10 diagnosed Patient A with uncontrolled hypertension and increased her Enalapril prescription from  
11 five (5) mg to ten (10) mg. Patient A's medical records do not contain documentation  
12 demonstrating that Respondent obtained and reviewed the patient's medical records from her April  
13 11, 2008 through April 14, 2008 hospitalization or that Respondent communicated with the  
14 patient's cardiologist. Further, Patient A's medical records from this visit are inaccurate,  
15 incomplete, illegible and/or untimely.

16           6.       On or about May 1, 2008, Patient A presented to Respondent for a follow-up visit  
17 complaining of a dry, persistent cough for four (4) days. Patient A's medical records from this  
18 visit contain documentation noting that the patient was recently seen by her cardiologist and that  
19 the cardiologist ordered lab work, which was performed on April 21, 2008. However, Patient A's  
20 medical records lack documentation demonstrating that the Respondent obtained and/or reviewed  
21 the patient's April 21, 2008 lab work or that Respondent communicated with the patient's  
22 cardiologist. During this visit, Respondent did not order Patient A to obtain lab work.  
23 Respondent diagnosed Patient A with uncontrolled hypertension and renal insufficiency but failed  
24 to outline a plan for addressing the patient's renal insufficiency. Respondent increased Patient A's  
25 Enalapril prescription from ten (10) mg to twenty (20) mg. Further, Patient A's medical records  
26 from this visit are inaccurate, incomplete, illegible and/or untimely.

27           7.       On or about May 12, 2008, Patient A presented to Respondent for a follow-up visit.  
28 Patient A's medical records from this visit do not contain documentation diagnosing the patient

1 with renal insufficiency. Respondent did not order Patient A to obtain lab work. However,  
2 Patient A's cardiologist did order the patient to obtain lab work. Further, Patient A's medical  
3 records from this visit are inaccurate, incomplete, illegible and/or untimely.

4 8. On or about May 13, 2008, Patient A was advised to see Respondent based on the  
5 results of her lab work, which showed both her potassium and creatinine levels were elevated.  
6 Patient A was immediately admitted to the hospital from Respondent's office with acute renal  
7 failure and hyperkalemia secondary to wrongfully increasing the dose of Enalapril. Further, Patient  
8 A's medical records from this visit are inaccurate, incomplete, illegible and/or untimely.

9 **COUNT I**

10 **(Malpractice)**

11 9. All of the allegations contained in the above paragraphs are hereby incorporated by  
12 reference as though fully set forth herein.

13 10. NRS 630.301(4) provides that malpractice of a physician is grounds for initiating  
14 disciplinary action against a licensee.

15 11. NAC 630.040 defines malpractice as the failure of a physician, in treating a patient, to  
16 use the reasonable care, skill, or knowledge ordinarily used under similar circumstances.

17 12. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed to  
18 use the reasonable care, skill and/or knowledge ordinarily used under similar circumstances when  
19 treating Patient A.

20 13. By reason of the foregoing, Respondent is subject to discipline by the Board as  
21 provided in NRS 630.352.

22 **COUNT II**

23 **(Medical Records Violation)**

24 14. All of the allegations in the above paragraphs are hereby incorporated as if fully set  
25 forth herein.

26 15. NRS 630.3062(1) provides that the failure to maintain timely, legible, accurate and  
27 complete medical records relating to the diagnosis, treatment and care of a patient is grounds for  
28 initiating discipline against a licensee.



OFFICE OF THE GENERAL COUNSEL  
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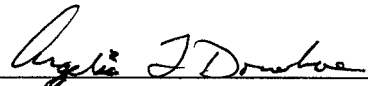
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**CERTIFICATE OF MAILING**

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 1<sup>st</sup> day of May 2013; I served a filed copy of the COMPLAINT, PATIENT DESIGNATION AND FINGERPRINT INFORMATION, via USPS certified return receipt mail to the following:

Christoper T. Patin, M.D.  
3488 Goni Rd.  
Carson City, NV 89706

Dated this 1<sup>st</sup> day of May, 2013.

  
\_\_\_\_\_  
Angelia L. Donohoe  
Legal Assistant