

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

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4
5 **In the Matter of Charges and**
6 **Complaint Against**
7 **DEVENDRAKUMAR I. PATEL, M.D.,**
8 **Respondent.**

Case No. 18-29352-1

FILED

JAN 26 2018

NEVADA STATE BOARD OF
MEDICAL EXAMINERS
BY: _____

9
10 **COMPLAINT**

11 The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners
12 (Board), by and through Aaron Bart Fricke, Esq., Deputy General Counsel and attorney for the IC,
13 having a reasonable basis to believe that Devendrakumar I. Patel, M.D. (Respondent) violated the
14 provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code
15 (NAC) Chapter 630 (collectively, the Medical Practice Act), hereby issues its Complaint, stating
16 the IC's charges and allegations as follows:

17 1. Respondent is a physician licensed to practice medicine in the State of Nevada
18 (License No. 11068). He was originally licensed by the Board on July 23, 2004.

19 2. Patient A was a 58-year-old male when he presented to Respondent for medical
20 care on October 2, 2012. Patient A's true identity is not disclosed herein to protect his privacy,
21 but is disclosed in the Patient Designation served upon Respondent along with a copy of this
22 Complaint.

23 3. On October 2, 2012, Patient A presented to Respondent with signs and symptoms
24 of an ST² elevation myocardial infarction (STEMI) of the inferior wall. Despite ample medical
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27 ¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time the filing of this
28 Complaint was approved, was composed of Rachakonda D. Prabhu, M.D., Ms. Sandy Peltyn, and Victor M. Muro,
M.D.

² In electrocardiography, the "ST" segment connects the QRS complex and the T wave and has a duration of 0.005 to
0.150 sec (5 to 150 ms). ST elevation may indicate transmural myocardial infarction.

1 evidence available to him, Respondent failed to properly assess and diagnose the STEMI on
2 October 2, 2012.

3 4. Based on the medical evidence available to him, specifically, ongoing clinical and
4 ECG changes consistent with ischemia, Respondent failed to order urgent cardiac
5 revascularization at a facility capable of rapid revascularization, including Percutaneous Coronary
6 Intervention (PCI) or Coronary Artery Bypass Grafting (CABG), for Patient A on
7 October 2, 2012.

8 COUNT I

9 **NRS 630.301(4) (Malpractice)**

10 5. All of the allegations in the above paragraphs are hereby incorporated as if fully set
11 forth herein.

12 6. Malpractice is grounds for disciplinary action against a licensee pursuant to
13 NRS 630.301(4).

14 7. NAC 630.040 defines malpractice as the failure to use the reasonable care, skill, or
15 knowledge ordinarily used under similar circumstances when treating a patient.

16 8. As demonstrated by, but not limited to, the above-outlined facts, Respondent
17 committed malpractice with respect to his treatment of Patient A.

18 9. By reason of the foregoing, Respondent is subject to discipline by the Board as
19 provided in NRS 630.352.

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

21 1. That the Board give Respondent notice of the charges herein against him and give
22 him notice that he may file an answer to the Complaint herein as set forth in NRS 630.339(2)
23 within twenty (20) days of service of the Complaint;

24 2. That the Board set a time and place for a formal hearing after holding an
25 Early Case Conference pursuant to NRS 630.339(3);

26 3. That the Board determine the sanctions it will impose if it finds Respondent
27 violated the Medical Practice Act;

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4. That the Board make, issue and serve upon the Respondent, in writing, its findings of fact, conclusions of law and order, which shall include the sanctions imposed; and

5. That the Board take such other and further action as may be just and proper in these premises.

DATED this 26 day of January, 2018.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 
Robert Kilroy, Esq., General Counsel
Aaron Bart Fricke, Esq., Deputy General Counsel
Donald K. White, Esq., Deputy General Counsel
Attorneys for the Investigative Committee

VERIFICATION

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STATE OF NEVADA)
 : ss.
COUNTY OF CLARK)

Rachakonda D. Prabhu, M.D., hereby deposes and states under penalty of perjury under the laws of the State of Nevada that he is the Chairman of the Investigative Committee of the Nevada State Board of Medical Examiners that authorized the foregoing Complaint against the Respondent herein; that he has read the foregoing Complaint; and based upon information discovered during the course of the investigation into a complaint against Respondent, he believes the allegations and charges in the foregoing Complaint against Respondent are true, accurate and correct.

DATED this 26th day of January, 2018.



Rachakonda D. Prabhu, M.D.
Chairman, Investigative Committee
Nevada State Board of Medical Examiners

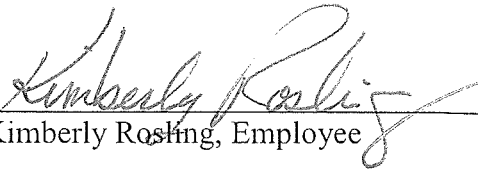
OFFICE OF THE GENERAL COUNSEL
Nevada State Board of Medical Examiners
1105 Terminal Way #301
Reno, Nevada 89502
(775) 688-2559

CERTIFICATE OF SERVICE

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2 I hereby certify that I am employed by the Nevada State Board of Medical Examiners and
3 that on the 26th day of January, 2018, I served a file-stamped copy of the COMPLAINT and
4 FINGERPRINT INFORMATION, via USPS e-certified return receipt mail (9171 9690 0935 0096
5 2379 67) to the following:

6 Devendrakumar I. Patel, M.D.
7 NORTHERN NEVADA CARDIOLOGY PC
8 674 North Cedar Street
9 Elko, NV 89801

10 DATED this 26th day of January, 2018.

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13 Kimberly Rosling, Employee
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