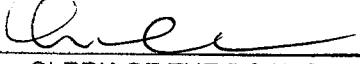


ORIGINAL

BEFORE THE BOARD OF MEDICAL EXAMINERS
OF THE STATE OF NEVADA

In The Matter of Charges and)
)
Complaint Against)
)
LONNIE HAMMARGREN, M.D.,)
)
Respondents.)

NO. Case No. 08-3900-1
FILED December 11, 2008

CLERK OF THE BOARD

COMPLAINT

The Investigative Committee of the Board of Medical Examiners of the state of Nevada, composed of Sohail U. Anjum, M.D., Chairman, S. Daniel McBride, M.D., Member, and Van Heffner, Member, by and through Lyn E. Beggs, General Counsel for the Nevada State Board of Medical Examiners, having a reasonable basis to believe that Lonnie Hammargren, M.D., has violated the provisions of NRS Chapter 630, hereby issues its formal Complaint, stating the Investigative Committee's charges and allegations, as follows:

1. Dr. Hammargren is currently licensed in active status, and was so licensed by the Nevada State Board of Medical Examiners, hereinafter referred to as "the Board," on June 9, 1971 (License No. 2528), pursuant to the provisions of Chapter 630 of the Nevada Revised Statutes, and at all times addressed herein was so licensed.

2. Patient A was a forty-four year old female at the time of the incidents in question. Her true identify is not disclosed to protect her privacy, but her identity is disclosed in the Patient Designation served on Dr. Hammargren along with a copy of this Complaint.

3. On June 29, 2001, Patient A presented to the emergency room at Desert Springs Hospital in Las Vegas, complaining of right sided tingling in her arm and leg with weakness in the right leg.

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

1 4. A CT scan was performed on June 29, 2001 showing a 2.0 cm round mass lesion in
2 the posteromedial left parietal lobe, which was suspected of being a meningioma.

3 5. Patient A was seen by Dr. Hammargren in June 2001. Dr. Hammargren referred
4 her to a radiation oncologist, Dr. Toy, for evaluation.

5 6. Dr. Toy found Patient A was a good candidate for surgical removal of the
6 meningioma and referred her for an MRI.

7 7. An MRI was completed on August 10, 2001, which showed a 2 cm by 1.6 cm
8 extra-axial mass originating from the posterior flax, most consistent with a meningioma.

9 8. Dr. Hammargren performed a craniotomy to remove the meningioma on February
10 21, 2002.

11 9. A postoperative pathology report dated February 23, 2002, noted that in the
12 specimen provided from Patient A's surgery, that no meningioma was identified.

13 10. A second pathology report date February 25, 2002, was produced as a supplement
14 indicating that deeper levels were examined and no evidence of meningioma was seen.

15 11. Patient A had a post-operative MRI scan completed on June 20, 2002, which
16 showed a left parafalcine extra axial mass with little change in size with a maximum diameter near
17 2 centimeters and that this scan showed little change compared to the earlier MRI performed.

18 **Count I**

19 12. Nevada Administrative Code Section 630.040 defines malpractice as the failure of
20 a physician, in treating a patient, to use the reasonable care, skill, or knowledge ordinarily used
21 under similar circumstances.

22 13. Nevada Revised Statute Section 630.301(4) provides that malpractice is grounds
23 for initiating disciplinary action against a licensee.

24 14. Dr. Hammargren failed to use the reasonable care, skill, or knowledge ordinarily
25 used under similar circumstances when he failed remove Patient A's meningioma during the
26 craniotomoy performed on February 21, 2002 and thus has violated NRS 630.301(4).

27 15. By reason of the foregoing, Dr. Hammargren is subject to discipline by the Nevada
28 State Board of Medical Examiners as provided in Section 630.352 of the Nevada Revised Statutes.

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WHEREFORE, the Investigative Committee prays:

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

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

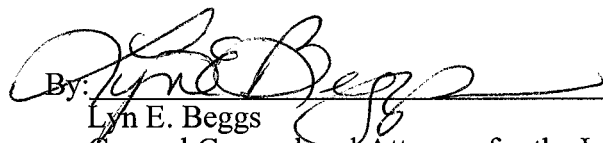
3. That the Nevada State Board of Medical Examiners determine what sanctions to impose for the violation or violations committed by Respondent; and

4. That the Nevada State Board of Medical Examiners make, issue and serve on Respondent its findings of fact, conclusions of law and order, in writing, that includes the sanctions imposed; and

5. That the Nevada State Board of Medical Examiners take such other and further action as may be just and proper in these premises.

DATED this 11th day of December 2008.

INVESTIGATIVE COMMITTEE OF
THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

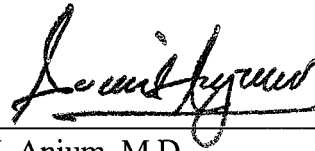
By: 
Lyn E. Beggs
General Counsel and Attorney for the Investigative Committee

VERIFICATION

1
2 STATE OF NEVADA)
3 COUNTY OF CLARK) : ss.

4
5 Sohail U. Anjum, M.D., having been duly sworn, hereby deposes and states under penalty
6 of perjury that he is the Chairman of the Investigative Committee of the Nevada State Board of
7 Medical Examiners that authorized the complaint against the Respondent herein; that he has read
8 the foregoing Complaint; and that based upon information discovered in the course of the
9 investigation into a complaint against Respondent, he believes that the allegations and charges in
10 the foregoing Complaint against Respondent are true, accurate, and correct.

11 DATED this 11th day of December, 2008.

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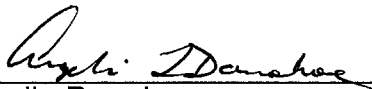
14
15 _____
16 Sohail U. Anjum, M.D.

CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on the 11th day of December 2008, I served a file copy of the COMPLAINT, PATIENT DESIGNATION, SETTLEMENT, WAIVER & CONSENT AGREEMENT, by mailing via USPS certified return receipt to the following:

Lonnie Hammargren, M.D.
4300 Ridgcrest Dr.
Las Vegas, NV 89109

Dated this 11th day of December 2008.



Angelia Donohoe
Legal Assistant

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