

COPY

BEFORE THE BOARD OF MEDICAL EXAMINERS
OF THE STATE OF NEVADA

* * * * *

In The Matter of Charges and)
)
Complaint Against)
)
AARON JAY GOODRUM, M.D.,)
)
Respondent.)

NO. Case No. 09-31733-1

FILED February 25 2009
Sandra C. Fisher
CLERK OF THE BOARD

COMPLAINT

The Investigative Committee of the Board of Medical Examiners of the state of Nevada, composed of Charles N. Held, M.D., Chairman, Benjamin Rodriguez, M.D., Member, and Jean Stoess, M.A., Member, by and through Lyn E. Beggs, General Counsel for the Nevada State Board of Medical Examiners, having a reasonable basis to believe that Aaron Jay Goodrum, 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. Goodrum 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 6, 2006 (License No. 11874), pursuant to the provisions of Chapter 630 of the Nevada Revised Statutes, and at all times addressed herein was so licensed.

Count I

2. Dr. Goodrum was issued a medical license by the State of Florida, Department of Health in 2005.

3. On March 3, 2008, the State of Florida, Department of Health filed an administrative disciplinary complaint against Dr. Goodrum alleging that in September 2007, Dr. Goodrum had pled guilty to false imprisonment and battery, felony charges, in Palm Beach County, Florida.

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

1 4. On June 19, 2008, the Board of Medicine in Florida issued a final order adopting a
2 settlement agreement to resolve the outstanding administrative complaint against Dr. Goodrum
3 which included a reprimand, a fine, costs, and additional terms and conditions,

4 5. Nevada Revised Statute Section 630.301(3) provides that any disciplinary action
5 regarding a license to practice any type of medicine taken by another state or any other jurisdiction
6 is grounds for discipline.

7 6. The disciplinary action taken by the State of Florida, Department of Health
8 constitutes a violation of the provisions of NRS 630.301(3).

9 7. By reason of the foregoing, Dr. Goodrum is subject to discipline by the Nevada
10 State Board of Medical Examiners as provided in NRS 630.352.

11 **Count II**

12 8. Dr. Goodrum was issued a medical license by the state of Missouri in July 2001.

13 9. On January 16, 2009, the Missouri State Board of Registration for the Healing Arts
14 held a hearing on a disciplinary complaint based upon Dr. Goodrum's guilty plea to felony false
15 imprisonment in the state of Florida in September 2007. After deliberations, the Missouri Board
16 revoked Dr. Goodrum's license to practice medicine in the state of Missouri. An order was
17 entered to this effect on January 23, 2009.

18 10. Nevada Revised Statute Section 630.301(3) provides that any disciplinary action
19 regarding a license to practice any type of medicine taken by another state or any other jurisdiction
20 is grounds for discipline.

21 11. The disciplinary action taken by the Missouri State Board of Registration for the
22 Healing Arts constitutes a violation of the provisions of NRS 630.301(3).

23 12. By reason of the foregoing, Dr. Goodrum is subject to discipline by the Nevada
24 State Board of Medical Examiners as provided in NRS 630.352.

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

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

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

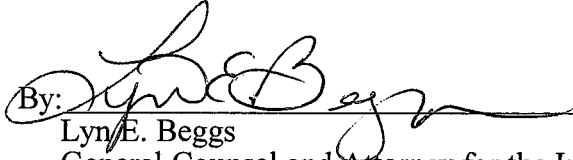
4 3. That the Nevada State Board of Medical Examiners determine what sanctions to
5 impose for the violation or violations committed by Respondent; and

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

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

11 DATED this 25th day of February, 2009.

12 INVESTIGATIVE COMMITTEE OF
13 THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

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

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VERIFICATION

STATE OF NEVADA)
 : ss.
COUNTY OF DOUGLAS)

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

DATED this 25th day of February, 2009.



Charles N. Held, M.D.


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CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on the 25th day of February 2009, I served a file copy of the COMPLAINT along with a SETTLEMENT, WAIVER & CONSENT AGREEMENT, by mailing via USPS certified return receipt mail to the following:

Aaron Jay Goodrum, M.D.
141 S. Sherrill St.
Tampa, FL 33609

Dated this 25th day of February 2009.



Angelia Donohoe
Legal Assistant