

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

3 \* \* \* \* \*

4 **In The Matter of Charges and** )  
5 )  
6 **Complaint Against** )  
7 **CHARLES E. GRAHAM, M.D.,** )  
8 )  
9 **Respondent.** )

Case No. 11-7922-1

**FILED**

**MAR 10 2011**

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS  
By: 

10 **COMPLAINT**

11 The Investigative Committee of the Nevada State Board of Medical Examiners (Board),  
12 composed of Charles N. Held, M.D., Theodore B. Berndt, M.D., and Ms. Valerie Clark, BSN,  
13 RHU, LUTCF, by and through Edward O. Cousineau, Deputy Executive Director for the Board  
14 and Attorney for the Investigative Committee, having a reasonable basis to believe that  
15 Charles E. Graham, M.D., hereinafter referred to as "Respondent," has violated the provisions of  
16 NRS Chapter 630, hereby issues its formal Complaint, stating the Investigative Committee's  
17 charges and allegations, as follows:

18 1. Respondent was actively licensed to practice medicine by the Board on  
19 July 1, 1993, pursuant to the provisions of Chapter 630 of the Nevada Revised Statutes, and was  
20 so until July 1, 2009. Respondent's current licensure status is automatically suspended.

21 2. Pursuant to standard procedure, the Investigative Committee, through Board staff,  
22 requested Respondent to provide a response and records related to two matters before the  
23 Investigative Committee. Initial requests were made in January of 2009. Similar requests were  
24 made in April, May and August of 2009. None of these requests were met with a response.

25 3. On September 16, 2009, Respondent was personally served with two orders from  
26 the Investigative Committee requesting a response and records related to the matter before the  
27 Investigative Committee. The two orders indicated that the requested materials were to be  
28 provided to the Investigative Committee within ten days of service of the order.

1 4. No records or response were received by the Investigative Committee or Board  
2 staff subsequent to the serving of the orders on September 16, 2009.

3 5. NRS 630.3065(2)(a) provides that willful failure to comply with a regulation,  
4 subpoena or order of the Board or a committee designated by the Board to investigate a complaint  
5 against a physician is grounds for initiating disciplinary action against a physician.

6 6. Respondent failed to comply with the orders of the Investigative Committee served  
7 on September 16, 2009 when he failed to provide either a response or records as ordered.

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

10 WHEREFORE, the Investigative Committee prays:

11 1. That the Board set a time and place for a formal hearing;


12 2. That the Board give Respondent notice of the charges herein against him, the time  
13 and place set for the hearing, and the possible sanctions against him;

14 3. That the Board determine what sanctions it determines to impose for the violation  
15 or violations committed by Respondent;

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

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

20 DATED this 16<sup>th</sup> day of March, 2011.

21  
22 By:   
23 Edward Cousineau  
24 Attorney for the Investigative Committee of the  
25 Nevada State Board of Medical Examiners  
26  
27  
28


VERIFICATION

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

STATE OF NEVADA            )  
  : ss.  
COUNTY OF DOUGLAS        )

Charles N. Held, 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 that based upon information discovered during the course of the investigation into a complaint against Respondent, that he believes the allegations and charges in the foregoing Complaint against Respondent are true, accurate, and correct.

Dated this 16<sup>th</sup> day of March, 2011.

  
\_\_\_\_\_  
Charles N. Held, M.D.

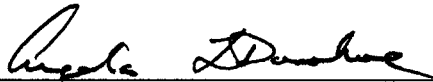
1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**CERTIFICATE OF MAILING**

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 10<sup>th</sup> day of March 2011; I served a file copy of the Complaint & Fingerprint Information by mailing via USPS certified return receipt mail to the following:

Charles Graham, M.D.  
3435 W. Craig Rd., Ste. A  
North Las Vegas, NV 89032

Dated this 10<sup>th</sup> day of March 2011.



---

Angelia L. Donohoe  
Legal Assistant