

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

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

\* \* \* \* \*


In The Matter of Charges and )  
 )  
Complaint Against )  
 )  
EDWARD VICTORIA, M.D. )  
 )  
Respondent. )

Case No. 11-33039-1

**FILED**

**JAN 05 2011**

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS

By: 

**COMPLAINT**

The Investigative Committee of the Nevada State Board of Medical Examiners, composed at the time filing was approved of Charles N. Held, M.D., Theodore B. Berndt, M.D. and Ms. Valerie Clark, BSN, RHU, LUTCF, having a reasonable basis to believe that Edward Victoria, M.D., hereinafter referred to as Dr. Victoria, 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. Victoria is currently licensed in active status (License No.12452), and was originally licensed on September 4, 2007 by the Nevada State Board of Medical Examiners pursuant to the provisions of Chapter 630 of the Nevada Revised Statutes.

2. Patient A was a sixty five year-old female at the time she was seen by Dr. Victoria. Her true identify is not disclosed to protect her privacy, but her identity is disclosed in the Patient Designation served on Dr. Victoria along with a copy of this Complaint.

3. Patient A was involved in a motor vehicle accident in November 2007 while in Seattle, WA and suffered multiple severe injuries. She had an extended hospital course while in Seattle and was transferred to Las Vegas to St. Rose San Martin Hospital on December 8, 2007.

4. Prior to her transfer to Las Vegas, Patient A had a percutaneous endoscopic gastrostomy (PEG) tube placed by an interventional radiology.



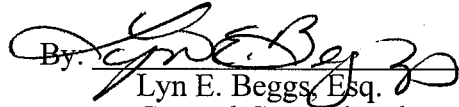
1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**WHEREFORE**, the Investigative Committee prays:

1. That the Nevada State Board of Medical Examiners give Dr. Victoria notice of the charges herein against him and give him notice that he may file an answer to the Complaint herein as set forth in Section 630.339 of the Nevada Revised Statutes within twenty (20) days of service of the Complaint.
2. That the Nevada State Board of Medical Examiners set a time and place for a formal hearing after holding an Early Case Conference pursuant to NRS 630.339(3);
3. That the Nevada State Board of Medical Examiners determine what sanctions it determines to impose if it determines there has been a violation or violations of the Medical Practice Act (Nevada Revised Statutes Chapter 630) committed by Dr. Victoria; and
4. That the Nevada State Board of Medical Examiners make, issue and serve on Dr. Victoria its findings of facts, 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 5<sup>th</sup> day of January 2011.

THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

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

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., 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 5<sup>th</sup> day of January, 2011.

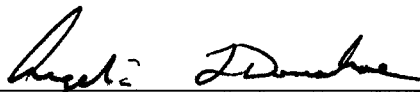
  
\_\_\_\_\_  
CHARLES N. HELD, M.D.

**CERTIFICATE OF MAILING**

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 5<sup>th</sup> day of January 2011; I served a file copy of the Complaint, Patient Designation & Fingerprint Information, by mailing via USPS certified return receipt mail to the following:

Edward Victoria, M.D.  
6857 W. Charleston Blvd.  
Las Vegas, NV 89117

Dated this 5<sup>th</sup> day of January 2011.



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

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