

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

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

3 \* \* \* \* \*

4 **In The Matter of Charges and** )  
5 **Complaint Against** )  
6 **TUDOR C. JIANU, M.D.** )  
7 **Respondent.** )  
8 \_\_\_\_\_ )  
9

Case No. 11-11846-1

**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, composed  
12 of Charles N. Held, M.D., Theodore B. Berndt, M.D. and Ms. Valerie Clark, BSN, RHU, LUTCF,  
13 having a reasonable basis to believe that Tudor C. Jianu, M.D., hereinafter referred to as Dr. Jianu,  
14 has violated the provisions of NRS Chapter 630, hereby issues its formal Complaint, stating the  
15 Investigative Committee's charges and allegations, as follows:

16 1. Dr. Jianu is currently licensed in active status (License No. 8309), and was  
17 originally licensed on July 14, 1997 by the Nevada State Board of Medical Examiners pursuant to  
18 the provisions of Chapter 630 of the Nevada Revised Statutes.

19 2. Patient A was a fifty-four-year-old male at the time of the matter in question. His  
20 true identify is not disclosed to protect his privacy, but his identity is disclosed in the Patient  
21 Designation served on Dr. Jianu along with a copy of this Complaint.

22 3. Patient A presented to Dr. Jianu on August 2, 2007 upon referral from another  
23 physician for evaluation of bilateral hand, neck, shoulder, hip, knee, ankle and foot pain which  
24 began after a motor vehicle accident approximately one year prior to presentation. Patient A also  
25 had experienced weight gain and was experiencing poor sleep, fatigue and feelings of depression.

26 4. Upon examination of Patient A, Dr. Jianu noted some arthralgia of the left shoulder  
27 with pressure and recommended a steroid injection of the left shoulder consisting of lidocaine and  
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1 depomedrol. Patient A noted that in the past he had felt spacey from an injection of novocaine.  
2 After the risks were discussed with Patient A, he did agree to the injection.

3 5. Immediately after the injection of lidocaine and depomedrol in his left shoulder,  
4 Patient A began having difficulty breathing, was coughing and sweating.

5 6. Dr. Jianu recognized Patient A was experiencing possible anaphylactic shock and  
6 paramedics were immediately called by Dr. Jianu's office; however Patient A did not receive any  
7 administration of epinephrine or oxygen from Dr. Jianu or his staff although both were available in  
8 Dr. Jianu's office.

9 7. Patient A was noted to be code blue at the time the paramedics arrived, however he  
10 was not receiving any respiratory efforts and was not being closely monitored. The paramedics  
11 immediately gave Patient A epinephrine, shocked him three times and had to intubate him. CPR  
12 was performed as Patient A was transported to Saint Rose Dominican Hospital- Siena Campus.

13 8. At the hospital, Patient A was also noted in the emergency department to be  
14 experiencing a code blue and resuscitation efforts were attempted for twenty minutes including  
15 multiple defibrillations and multiple epinephrine being given; however Patient A could not be  
16 resuscitated.

17 9. An autopsy was performed which indicated the cause of death was systemic  
18 anaphylaxis.

19 10. Dr. Jianu did prepare an electronic medical record for Patient A which was started  
20 on August 2, 2007 at the time of Patient A's appointment, however the record indicates that it was  
21 not electronically signed by Dr. Jianu until June 17, 2010.

22 **Count I**

23 11. NAC 630.040 defines malpractices as the failure of a physician, in treating a  
24 patient, to use the reasonable care, skill, or knowledge ordinarily used under similar  
25 circumstances.

26 12. NRS 630.301(4) provides that malpractice is grounds for initiating discipline  
27 against a licensee.

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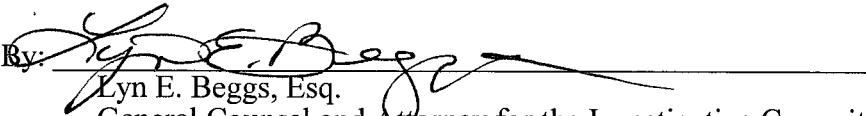
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4. That the Nevada State Board of Medical Examiners make, issue and serve on Dr. Jianu its findings of facts, conclusions of law and order, in writing, that includes the sanctions imposed; and

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 10<sup>th</sup> day of March, 2011.

THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

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

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 10<sup>th</sup> day of March, 2011.

  
CHARLES N. HELD, M.D

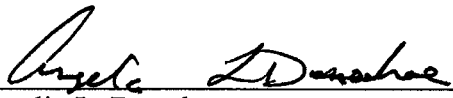
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**CERTIFICATE OF MAILING**

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

Tudor Jianu, M.D.  
8420 S. Eastern Ave., #101  
Las Vegas, NV 89123

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

  
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Angelia L. Donohoe  
Legal Assistant