

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

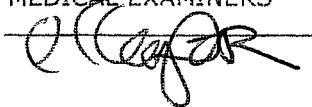
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In the Matter of Charges and )  
Complaint Against )  
CARL RICHARD LEVISEUR, M.D., )  
Respondent. )

Case No. 12-9474-1

**FILED**

AUG 20 2012

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS  
By: 

**COMPLAINT**

The Investigative Committee of the Nevada State Board of Medical Examiners (Board), composed at the time of filing of Benjamin J. Rodriguez, M.D., Chairman, Beverly A. Neyland, M.D., Member, and Donna A. Ruthe, Member, by and through Erin L. Albright, Esq., Attorney for the Investigative Committee and Deputy General Counsel, having a reasonable basis to believe that Carl Levisur, M.D. (Respondent), violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 (Medical Practice Act), hereby issues its formal Complaint, stating the Investigative Committee's charges and allegations as follows:

1. Respondent is currently licensed in active status (License No. 5386), and has been so licensed since July 2, 1986 by the Board pursuant to the provisions of the Medical Practice Act.
2. Patient A was a seventy-five (75) -year-old female at the time of the incident in question. Her true identity is not disclosed in this Complaint to protect her identity, but her identity is disclosed in the Patient Designation served on Respondent along with a copy of this Complaint.
3. At the time of the incident, Patient A suffered from atrial fibrillation. She was taking Coumadin, chronic anticoagulation medication, under the care and supervision of Respondent.



1 11. Nevada Administrative Code (NAC) 630.040 defines malpractice as the failure of a  
2 physician, in treating a patient, to use the reasonable care, skill, or knowledge ordinarily used  
3 under similar circumstances.

4 12. NRS 630.301(4) provides that malpractice of a physician is grounds for initiating  
5 disciplinary action against a licensee.

6 13. Respondent failed to use reasonable care, skill or knowledge ordinarily used under  
7 similar circumstances when he failed to advise Patient A to seek immediate emergent care after  
8 receipt of Patient A's prothrombin time lab results showing Patient A's INR was 11.8.

9 14. By reason of the foregoing, Respondent is subject to discipline by the Board as  
10 provided in NRS 630.352.

11 **COUNT II**

12 **(Medical Records Violation)**

13 15. All of the allegations in the above paragraphs are hereby incorporated as if fully set  
14 forth herein.

15 16. NRS 630.3062(1) provides that the failure to maintain timely, legible, accurate and  
16 complete medical records relating to the diagnosis, treatment and care of a patient is grounds for  
17 initiating discipline against a licensee.

18 17. Respondent failed to maintain accurate and/or complete medical records relating to  
19 the diagnosis, treatment and care of Patient A when he wrote incomplete, untimed and/or illegible  
20 entries in Patient A's chart.

21 18. By reason of the foregoing, Respondent is subject to discipline by the Board as  
22 provided in NRS 630.352.

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

24 1. That the Board gives Respondent notice of the charges herein against him and give  
25 him notice that he may file an answer to the Complaint herein as set forth in NRS 630.339(2)  
26 within twenty (20) days of service of the Complaint;

27 2. That the Board sets a time and place for a formal hearing after holding an  
28 Early Case Conference pursuant to NRS 630.339(3);

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3. That the Board determines the sanctions it will impose if it finds Respondent violated the Medical Practice Act;

4. That the Board makes, issues and serves on Respondent, in writing, its findings of fact, conclusions of law and order, which shall include the sanctions imposed; and

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

DATED this 20<sup>th</sup> day of August, 2012.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:   
Erin L. Albright, Esq.  
Deputy General Counsel  
Attorney for the Investigative Committee

VERIFICATION

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

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

11 Dated this 20<sup>th</sup> day of August, 2012.

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14 Benjamin J. Rodriguez, M.D.  
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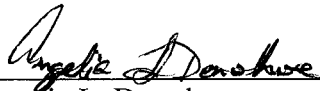
CERTIFICATE OF SERVICE

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 28<sup>th</sup> day of August 2012, I served a filed copy of the Complaint, Patient Designation & Fingerprint information via USPS e-certified mail return receipt to the following:

Carl Levisaur, M.D.  
2210 E. Calvada Blvd.  
Pahrump, NV 89048

**This is address that we had to Lexis Nexus to get and confirm that he was at this location.**

Dated this 28<sup>th</sup> day of August 2012.

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