

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)
8 **GOBINDER SINGH CHOPRA, M.D.,**)
9)
10 **Respondent.**)

Case No. 12-12610-1

FILED

MAR 20 2012

NEVADA STATE BOARD OF
MEDICAL EXAMINERS

By: *J. Fisher*

11 **COMPLAINT**

12 The Investigative Committee of the Nevada State Board of Medical Examiners, composed
13 at the time filing of Theodore B. Berndt, M.D., Chairman, Valerie J. Clark, BSN, RHU, LUTCF,
14 Member, and Michael J. Fischer, M.D., Member, by and through Bradley O. Van Ry, Esq., Deputy
15 General Counsel for the board, and counsel for the Investigative Committee, having a reasonable
16 basis to believe that Gobinder Singh Chopra, M.D., hereinafter referred to as Respondent, has
17 violated the provisions of Nevada Revised Statutes (NRS) Chapter 630, hereby issues its formal
18 Complaint, stating the Investigative Committee's charges and allegations, as follows:

19 1. Respondent is currently licensed in active status (License No. 8963), and has been
20 so licensed since April 22, 1999 by the Nevada State Board of Medical Examiners pursuant to the
21 provisions of Chapter 630 of the NRS.

22 2. On or about December, 2010, Respondent and his practice, G.S. Chopra, M.D.,
23 Chtd., were investigated by the Department of Health and Human Services Office of Inspector
24 General for Medicare billing issues. The investigation subsequently continued, and negotiations
25 ensued. Negotiations proceeded and culminated in a settlement agreement executed by
26 Respondent on September 29, 2011.

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

OFFICE OF THE GENERAL COUNSEL

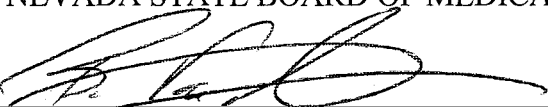
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5. That the Nevada State Board of Medical Examiners take such other and further action as may be just and proper in these premises.

DATED this 21st day of March, 2012.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 
Bradley O. Van Ry, Esq.
Deputy General Counsel
Counsel for the Investigative Committee

VERIFICATION

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STATE OF NEVADA)
 : ss.
COUNTY OF WASHOE)

Theodore B. Berndt, M.D., hereby deposes and states under penalty of perjury under the laws of the state of Nevada that I am 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 I have read the foregoing Complaint; and that based upon information discovered during the course of the investigation into a complaint against Respondent, that I believes the allegations and charges in the foregoing Complaint against Respondent are true, accurate, and correct.

Dated this 20th day of March, 2012.

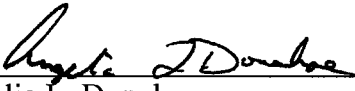
Theodore B. Berndt
Theodore B. Berndt, M.D.

CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 20th day of March 2012; I served a filed copy of the Complaint, Settlement letter & Fingerprint information, via USPS e-certified mail to the following:

Gobinder Chopra, M.D.
3201 South Maryland Parkway, Ste. 314
Las Vegas, NV 89109

Dated this 20th day of March 2012.



Angelia L. Donohoe
Legal Assistant