

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

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

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

* * * * *

In the Matter of Charges and)
)
Complaint Against)
)
RAMIN ETEBAR, M.D.,)
)
Respondent)

Case No. 12-8929-1

FILED

SEP 20 2012

NEVADA STATE BOARD OF
MEDICAL EXAMINERS

By: 

COMPLAINT

The Investigative Committee (IC) 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., Deputy General Counsel and Attorney for the IC, having a reasonable basis to believe that Ramin Etebar, M.D. (Respondent), violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 (Medical Practice Act), hereby issues its formal Complaint, stating the IC's charges and allegations as follows:

1. Respondent is currently licensed in active status (License No. 6788), and has been so licensed by the Board since July 1, 1993, pursuant to the provisions of the Medical Practice Act.

2. Patient A was a forty-four (44)-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 contemporaneously with a copy of this Complaint.

3. On January 27, 2010, Patient A underwent a VNUS Closure Procedure to treat Chronic Venous Insufficiency of her lower extremities performed by Respondent.

1 4. Patient A's chart does not contain a consent form signed by the patient for the
2 VNUS Closure Procedure.

3 5. Patient A's chart does not contain pre-procedure notes for the VNUS Closure
4 Procedure.

5 **COUNT I**

6 **(Medical Records Violation-Two Counts)**

7 6. All of the allegations in the above paragraphs are hereby incorporated as if fully set
8 forth herein.

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

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

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

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

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

21 2. That the Board set a time and place for a formal hearing after holding an
22 Early Case Conference pursuant to NRS 630.339(3);\

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

25 4. That the Board make, issue and serve on Respondent, in writing, its findings of
26 fact, conclusions of law and order, which shall include the sanctions imposed; and

27 ///

28 ///


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

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

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

DATED this 20th day of September, 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
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 CLARK)

Benjamin J. Rodriguez, 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 28th day of September, 2012.



Benjamin J. Rodriguez, 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 SERVICE

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

Ramin Etebar, M.D.
8228 Paseo Vista Drive
Las Vegas, NV 89128

Dated this 20th day of September 2012.



Angelia L. Donohoe
Legal Assistant