BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

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In the Matter of Charges and) Case No. 14-11447-1
Complaint Against) FILED
WILLIAM R. MARANON, M.D.,	OCT 2 3 2014
Respondent.	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 Theodore B. Berndt, M.D., Valerie J. Clark, BSN, RHU, LUTCF, and Michael J. Fischer, M.D., by and through Erin L. Albright, Esq., General Counsel and attorney for the IC, having a reasonable basis to believe that William R. Maranon, M.D. (Respondent), violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical Practice Act), hereby issues its Complaint, stating the IC's charges and allegations as follows:

- 1. Respondent is currently licensed in active status (License No. 7873), and has been so licensed by the Board since July 1, 1996, pursuant to the provisions of the Medical Practice Act.
- 2. At all times alleged herein, Patient A was a licensed nurse operating Revive Weight Loss located at 1040 S. Rainbow Blvd., Suite 101, Las Vegas, with Respondent acting as the medical director for said clinic. Patient A's true identity is not disclosed in this Complaint to protect her identity, but her identity is disclosed in the Patient Designation contemporaneously served on Respondent with this Complaint.
- 3. While Respondent was acting as Patient A's medical director, Respondent treated Patient A for her allergies.

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Respondent failed to document his care and treatment of Patient A in her medical 4. chart.

COUNT I

(Medical Records Violation)

- All of the allegations in the above paragraphs are hereby incorporated as if fully set 5. forth herein.
- NRS 630.3062(1) provides that the failure to maintain timely, legible, accurate and 6. complete medical records relating to the diagnosis, treatment and care of a patient is grounds for initiating discipline against a licensee.
- As demonstrated by, but not limited to, the above-outlined facts, Respondent failed 7. to maintain accurate and/or complete medical records relating to the diagnosis, treatment and care of Patient A when he failed to record his care and treatment of Patient A in Patient A's medical chart.
- By reason of the foregoing, Respondent is subject to discipline by the Board as 8. provided in NRS 630.352.

WHEREFORE, the Investigative Committee prays:

- That the Board give Respondent notice of the charges herein against him and give 1. him notice that he may file an answer to the Complaint herein as set forth in NRS 630.339(2) within twenty (20) days of service of the Complaint;
- That the Board set a time and place for a formal hearing after holding an 2. Early Case Conference pursuant to NRS 630.339(3);
- That the Board determine the sanctions it will impose if it finds Respondent 3. violated the Medical Practice Act;
- That the Board make, issue and serve on Respondent, in writing, its findings of 4. fact, conclusions of law and order, which shall include the sanctions imposed; and

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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

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

DATED this day of October, 2014.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

Erin L. Albright, Esq

General Counsel

Attorney for the Investigative Committee

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners

	VERIFICATIO	
STATE OF NEVADA)	
COUNTY OF WASHOE	: ss.)	
Theodore B. Berndt, M.D., hereby deposes and		
laws of the state of Nevac	la that he is the Chairman	
Navada Stata Board of Mac	lical Examiners that authori	

states under penalty of perjury under the 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 based upon information discovered during the course of the investigation into a complaint against Respondent, he believes the allegations and charges in the foregoing Complaint against Respondent are true, accurate and correct.

Dated this 23 day of October, 2014.

Theodore B. Berndt, M.D.

CERTIFICATE OF SERVICE

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 23rd day of October 2014; I served a filed copy of COMPLAINT, PATIENT DESIGNATION, SETTLEMENT AGREEMENT and FINGERPRINT INFORMATION USPS e-certified return receipt mail to the following:

William Maranon, M.D. c/o Michael Shannon, Esq. 7425 Peak Drive Las Vegas, NV 89128

Dated this 23rd day of October, 2014.

Angelia L. Donohoe Legal Assistant