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BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

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In the Matter of Charges and) C	ase No. 15-20508-1
Complaint Against)	FILED
ARA KESHISHIAN, M.D.,	j	FEB 1 9 2015
Respondent.		NEVADA STATE BOARD OF MEDICAL EXAMINERS V:

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 Ara Keshishian, 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. 9900), and has been so licensed by the Board since July 20, 2001, pursuant to the provisions of the Medical Practice Act.
- At the times alleged herein, Respondent was also licensed to practice medicine in 2. the state of California.
- 3. On or about July 11, 2014, Respondent and the Medical Board of California entered into a Stipulated Settlement and Disciplinary Order (Settlement) whereby Respondent's medical license was revoked for a period of three (3) years, with said revocation stayed pending the following terms and conditions: Respondent shall complete not less than forty (40) hours per year, for each year of probation, a Board preapproved Category I certified education

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program/course aimed at correcting any areas of deficient practice or knowledge; Respondent shall participate in and successfully complete the equivalent of the Medical Record Keeping Course offered by the Physician Assessment and Clinical Education Program (PACE), University of California, San Diego School of Medicine; Respondent shall enroll in a professionalism program that meets the requirements of Title 16, California Code of Regulations Section 1358: Respondent shall enroll in and successfully complete a clinical training or educational program equivalent to PACE; Respondent is prohibited from supervising physician assistants; Respondent shall obey all federal, state and local laws, all rules governing the practice of medicine in California, and shall remain in full compliance with any ordered criminal probation, payments and other orders; and Respondent shall submit quarterly declarations under penalty of perjury.

- 4. If Respondent fails to fully comply with any term or condition of probation, the Medical Board of California may rescind probation and revoke Respondent's California medical license.
- 5. On or about July 11, 2014, the Settlement was adopted as the Decision and Order of the Medical Board of California.
 - 6. To date, Respondent has not violated any terms or conditions of the Settlement.
- 7. Nevada Revised Statute Section 630.301(3) provides that any disciplinary action, including, without limitation, the revocation, suspension, modification or limitation of a license to practice any type of medicine, taken by another state is grounds for initiating discipline against a licensee.
- 8. The Settlement constitutes disciplinary action taken by another state that is grounds for initiating discipline against a licensee.
- 9. By reason of the foregoing, Respondent is subject to discipline by the Board as 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;

- 2. That the Board set a time and place for a formal hearing after holding an Early Case Conference pursuant to NRS 630.339(3);
- 3. That the Board determine the sanctions it will impose if it finds Respondent violated the Medical Practice Act;
- 4. That the Board make, issue and serve on Respondent, in writing, its findings of fact, conclusions of law and order, which shall include the sanctions imposed; and
- 5. That the Board take such other and further action as may be just and proper in these premises.

DATED this 19th day of February, 2015.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By

Erin L. Albright,

Attorney for the Investigative Committee

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners

VERIFICATION

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 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 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 19th day of February, 2015.

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 19th day of February 2015; I served a filed copy of COMPAINT & FINGERPRINT INFORMATION, via USPS certified return receipt mail to the following:

> Ara Keshishian, M.D. 1808 Verdugo Blvd., Ste. 413 Glendale, CA 91208

Dated this 19th day of February, 2015.

Angelia L. Donohoe Legal Assistant