

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

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5
6 **In the Matter of Charges and**)
7 **Complaint Against**)
8 **CHARLES P. VIRDEN, M.D.,**)
9 **Respondent.**)

Case No. 16-10736-1

FILED

MAY 17 2016

NEVADA STATE BOARD OF
MEDICAL EXAMINERS

By: _____

10
11 **COMPLAINT**

12 The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners
13 (Board) hereby issues this formal Complaint (Complaint) against Charles P. Virden, M.D.
14 (Respondent), a licensed physician in Nevada. After investigating this matter, the IC has a
15 reasonable basis to believe that Respondent has violated provisions of Nevada Revised Statutes
16 (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the
17 Medical Practice Act).

18 The IC alleges the following facts:

19 1. Respondent is currently licensed in active status (License No. 7420), has been
20 licensed by the Board since May 18, 1995. At all times alleged herein, Respondent was licensed
21 in an active status by the Board pursuant to the provisions of the Medical Practice Act.

22 2. Respondent, pursuant to the Nevada Secretary of State, is listed as the President of
23 Renovation, A Medical Spa, Inc. (Renovation), a domestic corporation, with a listed address of
24 960 Caughlin Crossing, Suite 100, Reno, Nevada, 89519.

25 3. Respondent's office is divided into two (2) sides, a medical treatment side and a
26 spa treatment side (Renovation).

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¹ The Investigative Committee of the Nevada State Board of Medical Examiners is composed of Board members
Beverly A. Neyland, M.D., Rachakonda D. Prabhu, M.D., and Ms. Sandy Peltyn.

1 4. The Nevada State Board of Cosmetology (Cosmetology Board) regulates and
2 inspects the spa treatment side of the facility; the Board regulates and inspects the medical
3 treatment side of Respondent's office.

4 5. Lynnsey Virden, pursuant to the Nevada Secretary of State, is the Renovation
5 Secretary, Treasurer and Corporate Director, and is a licensed registered nurse with the Nevada
6 Nursing Board (License # RN27427).

7 6. Respondent, pursuant to the Nevada Secretary of State, is a Managing Member of
8 The Skin Clinic LLC, with an address of 960 Caughlin Crossing, Suite 102, Reno, Nevada, 89519,
9 and Lynnsey Virden, pursuant to the Nevada Secretary of State, is a Managing Member of the The
10 Skin Clinic LLC.

11 7. Sports West Athletic Club, Inc. (Sports West) is located at 1575 South Virginia
12 Street, Reno, Nevada 89502.

13 8. Spa of the West at Sports West (Spa West) is located at 1545 South Virginia Street,
14 Reno, Nevada 89502, and, the Nevada Secretary of State lists this company as Spa West, LLC.

15 9. The Cosmetology Board regulates and inspects Renovation and Spa West.

16 10. Respondent is listed as the Medical Director of Spa West as listed on the Spa West
17 website.

18 11. Alyssa Dian Paddock (Paddock) is allegedly a medical assistant, pursuant to a
19 conversation with Respondent and as listed on the Renovation website as an aesthetician (License
20 # A-2235), pursuant to the Cosmetology Board, for Spa West.

21 12. Paddock, as an aesthetician, is only permitted to perform certain procedures, as
22 permitted by NRS 644.0205, and Paddock is not permitted to prescribe dangerous drugs or any
23 medication as an aesthetician or a medical assistant.

24 13. Darci Page (Page) is a license registered nurse (License # RN37726) who referred
25 patients to Renovation and is employed by Respondent.

26 14. Mary Clements (Clements) is the Spa Patient Liasion at Renovation.

27 15. All medical records of the patients treated by Paddock (Patients A through J) were
28 provided by Respondent pursuant to a Board Subpoena.

1 Respondent signed this consent prior to the injections, nor was a consultation documented in the
2 record; Respondent did not document any physician examination or pre-treatment consultation.

3 33. On or about April 22, 2015, at Renovation, Patient C, without proper consent,
4 received a B-12 injection and Lipotrovite injection by Paddock, who was not supervised by
5 Respondent.

6 34. On or about April 29, 2015, at Renovation, Patient C, with proper consent and
7 witnessed by Clements, received a B-12 injection and Lipotrovite injection by Paddock, who was
8 not supervised by Respondent.

9 **PATIENT D**

10 35. Patient D was a 56-year-old male at the time of the events at issue. His true identity
11 is not disclosed herein to protect his privacy, but is disclosed in the Patient Designation served
12 upon Respondent along with a copy of this Complaint.

13 36. On or about August 20, 2014, Patient D, an employee of Sports West, presented to
14 Renovation following a referral from Paddock. The Informed Consent was only signed by Patient
15 D; Respondent did not conduct an examination or consultation with Patient D; Respondent did not
16 document any treatment to be prescribed.

17 37. On or about October 21, 2014, at Renovation, Patient D, who did not sign a consent
18 form, received a B-12 injection and Lipotrovite injection by Paddock, who was not supervised by
19 Respondent.

20 38. On or about December 17, 2014, at Renovation, Patient D, who did not sign a
21 consent form, received a B-12 injection and Lipotrovite injection by Paddock, who was not
22 supervised by Respondent.

23 39. On or about January 21, 2015, at Renovation, Patient D, who did not sign a consent
24 form, received a B-12 injection and Lipotrovite injection by Paddock, who was not supervised by
25 Respondent.

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PATIENT E

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2 40. Patient E was a 53-year-old female at the time of the events at issue. Her true
3 identity is not disclosed herein to protect her privacy, but is disclosed in the Patient Designation
4 served upon Respondent along with a copy of this Complaint.

5 41. On or about October 1, 2014, Patient E presented to Renovation, Respondent's
6 Medical Spa, for weight loss, as a referral from the Transformation Weight Loss Clinic. For
7 treatment of skin care and as part of her weight loss regime, Patient E received B-12 and
8 Lipotrovite injections.

9 42. On or about October 1, 2014, Respondent failed to examine and consult with
10 Patient E prior to Paddock administering B12 and Lipotrovite injections; Patient E's chart
11 indicates a brief history, physical examination document, but lacks a date and is only partially
12 completed.

13 43. On or about October 1, 2014, a general treatment form signed only by Patient E.

14 44. On or about October 1, 2014, there is no information on the General Information
15 sheet documenting who the provider was. Listed instead under the title "Provider" is "Weight
16 Loss." The records do not reflect who administered the injections and there is no indication that
17 Respondent ever treated Patient E.

18 45. On or about October 1, 2014, a credit card authorization form contains Patient E's
19 initials under the "Invoice Number" that indicates "for on-going B-12 injections."

20 46. On or about October 1, 2014, a consent form for B-12 and Lipotrovite injections
21 was signed only by Patient E; there is no signature from Respondent; there is no consent for B-12
22 and Lipotrovite injections, however it was logged that one injection was administered on an
23 injection log sheet.

24 47. On or about October 13, 2014, at Renovation, Patient E, who did not sign a consent
25 form, received a B-12 injection and Lipotrovite injection by Paddock, who was not supervised by
26 Respondent.

27 48. On or about October 20, 2014, at Renovation, only Patient E signed a general
28 consent form for treatment.

OFFICE OF THE GENERAL COUNSEL

Nevada State Board of Medical Examiners

1105 Terminal Way #301

Reno, Nevada 89592

(775) 688-2559

1 68. On or about November, 22, 2013, at Renovation, Patient H, who did not sign a
2 consent form, received a B-12 injection treatment and Lipotrovite treatment by Paddock, who was
3 not supervised by Respondent; this treatment was documented by hand and written in after the
4 typed note from Respondent, dated March 20, 2014; this note was not written in a timely manner
5 and it was initialed by Respondent.

6 69. On or about March 4, 2014, at Renovation, Patient H, who did not sign a consent
7 form, received a B-12 injection treatment and Lipotrovite treatment by Paddock, who was not
8 supervised by Respondent; there was insurance information provided by Patient H.

9 70. On or about March 20, 2014, at Renovation, Patient H's medical record contains a
10 typed note stating that Patient H had received a laser peel treatment by Respondent. Neither
11 Patient H nor Respondent signed an informed consent for the aforementioned procedure.

12 71. On or about May 5, 2014, at Renovation, Patient H, who did not sign a consent
13 form, received a B-12 injection and Lipotrovite injection by Paddock, who was not supervised by
14 Respondent. Respondent documented a handwritten note after the typed note from Respondent,
15 dated 3/20/2014 and followed the hand-written notes initialed by Respondent, dated 11/22/2013
16 and 03/04/2014; this note was not written in a timely matter, altered and was initialed by
17 Respondent after the fact.

18 72. On or about May 27, 2014, the Nevada Board of Pharmacy, during an inspection of
19 Paddock's work space at Spa West, seized a copy of Respondent's prescription pad with a Latisse
20 prescription written for Patient H. There is no documentation establishing a doctor/patient
21 relationship; there is no medical basis for this Latisse prescription; there is no supervision of
22 Paddock by Respondent; upon the prescription label, it states "To be administered in physician's
23 office;" there is no documentation indicating that Patient H received administration of Latisse,
24 which was a prescription written by Paddock.

25 73. On or about August 4, 2014, Respondent provided a written response.

26 74. On or about October 22, 2014, Respondent provided two (2) pages of medical
27 records of Patient H (more than 60 days late).

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PATIENT I

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2 75. Patient I was a 59-year-old female at the time of the events at issue. Her true
3 identity is not disclosed herein to protect her privacy, but is disclosed in the Patient Designation
4 served upon Respondent along with a copy of this Complaint.

5 76. On or about August 26, 2014, Patient I presented to Renovation, Respondent's
6 Medical Spa, for B-12 and Lipotrovite injections. Respondent failed to examine and consult with
7 Patient I prior to Paddock administering B-12 and Lipotrovite injections; there is a general
8 information sheet documenting Respondent as Patient I's provider; A separate information sheet
9 notes Paddock, aesthetician, as the referral source; an informed consent form is in the medical
10 chart, however it is only signed by Patient I; these medical records do not reflect who
11 administered the shots and there is no indication that Respondent ever treated Patient I.

12 77. On or about August 27, 2014, Patient I signed a consent form for administration of
13 B12 and Lipotrovite injections. Respondent did not sign this consent prior to the injection nor was
14 a consultation documented in the record.

PATIENT J

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16 78. Patient J was a 69-year-old female at the time of the events at issue. Her true
17 identity is not disclosed herein to protect her privacy, but is disclosed in the Patient Designation
18 served upon Respondent along with a copy of this Complaint.

19 79. On or about August 6, 2014, Patient J presented to Renovation, Respondent's
20 Medical Spa, for skin care, laser treatment, and B-12 and Lipotrovite injections. Respondent
21 failed to examine and consult with Patient J prior to Paddock administering B-12 and Lipotrovite
22 shots via injections; there is a general information sheet documenting "Alyssa" as Patient J's
23 provider; the only "Alyssa" who works at Renovation is Paddock; the medical chart contains a
24 skin care and laser treatment consent form that is signed by Patient J and Paddock, but not by
25 Respondent; these medical records also contain a B-12 and Lipotrovite injections informed
26 consent, signed by both the Patient J and Paddock; these records do not reflect who administered
27 the shots and there is no indication that Respondent ever treated the patient.

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1 97. As demonstrated by, but not limited to, the above-outlined facts, Respondent
2 violated NRS 630.3062(1) when he failed to maintain timely, legible, accurate and complete
3 medical records relating to the diagnosis, treatment and care of a Patient B, who received B-12 in-
4 jection treatments during the time period of August 6, 2014 through April 22, 2015.

5 98. By reason of the foregoing, Respondent is subject to discipline by the Board as
6 provided in NRS 630.352.

7 **COUNT V**

8 **(NRS 630.305(1)(e): Aiding Practice By Unlicensed Person - Patient B)**

9 99. All of the allegations in the above paragraphs are hereby incorporated as if fully set
10 forth herein.

11 100. NRS 630.305(1)(e) provides that the aiding, assisting, employing or advising,
12 directly or indirectly, any unlicensed person to engage in the practice of medicine contrary to the
13 provisions of NRS 630 or the regulations of the Board is an act, among others, that constitutes
14 grounds for initiating disciplinary action.

15 101. As demonstrated by, but not limited to, the above-outlined facts, Respondent aided
16 an unlicensed person to engage in the practice of medicine when Paddock was acting within the
17 capacity as an aesthetician when she treated and cared for Patient B, who received B-12 injections
18 during the time period of August 6, 2014 through April 22, 2015, in Respondent's spa facility, and
19 not on the medical treatment side as a medical assistant.

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

22 **COUNT VI**

23 **(NRS 630.3062(1): Failure to Maintain Proper Medical Records - Patient C)**

24 103. All of the allegations in the above paragraphs are hereby incorporated as if fully set
25 forth herein.

26 104. NRS 630.3062(1) provides that the failure to maintain timely, legible, accurate and
27 complete medical records relating to the diagnosis, treatment and care of a patient is an act, among
28 others, that constitutes grounds for initiating disciplinary action.

1 105. As demonstrated by, but not limited to, the above-outlined facts, Respondent
2 violated NRS 630.3062(1) when he failed to maintain timely, legible, accurate and complete
3 medical records relating to the diagnosis, treatment and care of a Patient C, who received B-12
4 injections and Lipotrovite injections during the time period of August 20, 2014 through April 29,
5 2015.

6 106. By reason of the foregoing, Respondent is subject to discipline by the Board as
7 provided in NRS 630.352.

8 **COUNT VII**

9 **(NRS 630.305(1)(e): Aiding Practice By Unlicensed Person - Patient C)**

10 107. All of the allegations in the above paragraphs are hereby incorporated as if fully set
11 forth herein.

12 108. NRS 630.305(1)(e) provides that the aiding, assisting, employing or advising,
13 directly or indirectly, any unlicensed person to engage in the practice of medicine contrary to the
14 provisions of NRS 630 or the regulations of the Board is an act, among others, that constitutes
15 grounds for initiating disciplinary action.

16 109. As demonstrated by, but not limited to, the above-outlined facts, Respondent aided
17 an unlicensed person to engage in the practice of medicine when Paddock was acting within the
18 capacity as an aesthetician when she treated and cared for Patient C, who received B-12 injections
19 and Lipotrovite injections during the time period of August 20, 2014 through April 29, 2015, in
20 Respondent's spa facility, and not on the medical treatment side as a medical assistant.

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

23 **COUNT VIII**

24 **(NRS 630.3062(1): Failure to Maintain Proper Medical Records - Patient D)**

25 111. All of the allegations in the above paragraphs are hereby incorporated as if fully set
26 forth herein.

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1 112. NRS 630.3062(1) provides that the failure to maintain timely, legible, accurate and
2 complete medical records relating to the diagnosis, treatment and care of a patient is an act, among
3 others, that constitutes grounds for initiating disciplinary action.

4 113. As demonstrated by, but not limited to, the above-outlined facts, Respondent
5 violated NRS 630.3062(1) when he failed to maintain timely, legible, accurate and complete
6 medical records relating to the diagnosis, treatment and care of Patient D, who received B-12 and
7 Lipotrovite injection treatments during the time period of August 20, 2014 through January 21,
8 2015.

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

11 **COUNT IX**

12 **(NRS 630.305(1)(e): Aiding Practice By Unlicensed Person - Patient D)**

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

15 116. NRS 630.305(1)(e) provides that the aiding, assisting, employing or advising,
16 directly or indirectly, any unlicensed person to engage in the practice of medicine contrary to the
17 provisions of NRS 630 or the regulations of the Board is an act, among others, that constitutes
18 grounds for initiating disciplinary action.

19 117. As demonstrated by, but not limited to, the above-outlined facts, Respondent aided
20 an unlicensed person to engage in the practice of medicine when Paddock was acting within the
21 capacity as an aesthetician when she treated and cared for Patient D, who received B-12 injections
22 and Lipotrovite injections during the time period of August 20, 2014 through January 21, 2015 in
23 Respondent's spa facility, and not on the medical treatment side as a medical assistant.

24 118. By reason of the foregoing, Respondent is subject to discipline by the Board as
25 provided in NRS 630.352.

26 **COUNT X**

27 **(NRS 630.3062(1): Failure to Maintain Proper Medical Records - Patient E)**

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1 119. All of the allegations in the above paragraphs are hereby incorporated as if fully set
2 forth herein.

3 120. NRS 630.3062(1) provides that the failure to maintain timely, legible, accurate and
4 complete medical records relating to the diagnosis, treatment and care of a patient is an act, among
5 others, that constitutes grounds for initiating disciplinary action.

6 121. As demonstrated by, but not limited to, the above-outlined facts, Respondent
7 violated NRS 630.3062(1) when he failed to maintain timely, legible, accurate and complete
8 medical records relating to the diagnosis, treatment and care of a Patient E, who received B-12
9 and Lipotrovite injections during the time period of October 1, 2014 through November 10, 2014.

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

12 **COUNT XI**

13 **(NRS 630.305(1)(e): Aiding Practice By Unlicensed Person - Patient E)**

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

16 124. NRS 630.305(1)(e) provides that the aiding, assisting, employing or advising,
17 directly or indirectly, any unlicensed person to engage in the practice of medicine contrary to the
18 provisions of NRS 630 or the regulations of the Board is an act, among others, that constitutes
19 grounds for initiating disciplinary action.

20 125. As demonstrated by, but not limited to, the above-outlined facts, Respondent aided
21 an unlicensed person to engage in the practice of medicine when Paddock was acting within the
22 capacity as an aesthetician when she treated and cared for Patient E, who received B-12 injections
23 and Lipotrovite injections during the time period of October 1, 2014 through November 10, 2014.

24 126. By reason of the foregoing, Respondent is subject to discipline by the Board as
25 provided in NRS 630.352.

26 **COUNT XII**

27 **(NRS 630.3062(1): Failure to Maintain Proper Medical Records - Patient F)**

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COUNT XIV

(NRS 630.3062(1): Failure to Maintain Proper Medical Records - Patient G)

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

136. NRS 630.3062(1) provides that the failure to maintain timely, legible, accurate and complete medical records relating to the diagnosis, treatment and care of a patient is an act, among others, that constitutes grounds for initiating disciplinary action.

137. As demonstrated by, but not limited to, the above-outlined facts, Respondent violated NRS 630.3062(1) when he failed to maintain timely, legible, accurate and complete medical records relating to the diagnosis, treatment and care of a Patient G, who received an injection of Methionin Inositol Choline (hereinafter, MIC) as a treatment from Paddock during the time period of August 6, 2014 through August 13, 2014.

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

COUNT XV

(NRS 630.305(1)(e): Aiding Practice By Unlicensed Person - Patient G)

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

140. NRS 630.305(1)(e) provides that the aiding, assisting, employing or advising, directly or indirectly, any unlicensed person to engage in the practice of medicine contrary to the provisions of NRS 630 or the regulations of the Board is an act, among others, that constitutes grounds for initiating disciplinary action.

141. As demonstrated by, but not limited to, the above-outlined facts, Respondent aided an unlicensed person to engage in the practice of medicine when Patient G received an injection of MIC as a treatment from Paddock during the time period of August 6, 2014 through August 13, 2014.

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

COUNT XVI

(NRS 630.3062(1): Failure to Maintain Proper Medical Records - Patient H)

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

144. NRS 630.3062(1) provides that the failure to maintain timely, legible, accurate and complete medical records relating to the diagnosis, treatment and care of a patient is an act, among others, that constitutes grounds for initiating disciplinary action.

145. As demonstrated by, but not limited to, the above-outlined facts, Respondent violated NRS 630.3062(1) when he failed to maintain timely, legible, accurate and complete medical records relating to the diagnosis, treatment and care of a Patient H, who presented to Spa West at Sports West for weight loss, B-12 and Lipotrovite injections and a written prescription of Latisse during the time period of November 22, 2013 through May of 2014.

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

COUNT XVII

(NRS 630.305(1)(e): Aiding Practice By Unlicensed Person - Patient H)

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

148. NRS 630.305(1)(e) provides that the aiding, assisting, employing or advising, directly or indirectly, any unlicensed person to engage in the practice of medicine contrary to the provisions of NRS 630 or the regulations of the Board is an act, among others, that constitutes grounds for initiating disciplinary action.

149. As demonstrated by, but not limited to, the above-outlined facts, Respondent aided an unlicensed person to engage in the practice of medicine when Patient H presented to Spa West at Sports West and/or Renovation for weight loss, B-12 and Lipotrovite injections and a written prescription of Latisse from Paddock during the time period of November 22, 2013 through May of 2014.

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1 records relating to the diagnosis, treatment and care of a Patient I, who received B-12 and
2 Lipotrovite injections on August 27, 2014.

3 158. By reason of the foregoing, Respondent is subject to discipline by the Board as
4 provided in NRS 630.352.

5 **COUNT XX**

6 **(NRS 630.305(1)(e): Aiding Practice By Unlicensed Person - Patient I)**

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

9 160. NRS 630.305(1)(e) provides that the aiding, assisting, employing or advising,
10 directly or indirectly, any unlicensed person to engage in the practice of medicine contrary to the
11 provisions of NRS 630 or the regulations of the Board is an act, among others, that constitutes
12 grounds for initiating disciplinary action.

13 161. As demonstrated by, but not limited to, the above-outlined facts, Respondent aided
14 an unlicensed person to engage in the practice of medicine when Patient I received B-12 and
15 Lipotrovite injections by Paddock on August 26 and 27 of 2014.

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

18 **COUNT XXI**

19 **(NRS 630.3062(1): Failure to Maintain Proper Medical Records - Patient J)**

20 163. All of the allegations in the above paragraphs are hereby incorporated as if fully set
21 forth herein.

22 164. NRS 630.3062(1) provides that the failure to maintain timely, legible, accurate and
23 complete medical records relating to the diagnosis, treatment and care of a patient is an act, among
24 others, that constitutes grounds for initiating disciplinary action.

25 165. As demonstrated by, but not limited to, the above-outlined facts, Respondent
26 violated NRS 630.3062(1) when he failed to maintain timely, legible, accurate and complete
27 medical records relating to the diagnosis, treatment and care of a Patient J, who received a skin
28 care, laser treatment, B-12 and Lipotrovite injections on August 6, 2014.

1 166. By reason of the foregoing, Respondent is subject to discipline by the Board as
2 provided in NRS 630.352.

3 **COUNT XXII**

4 **(NRS 630.305(1)(e): Aiding Practice By Unlicensed Person - Patient J)**

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

7 168. NRS 630.305(1)(e) provides that the aiding, assisting, employing or advising,
8 directly or indirectly, any unlicensed person to engage in the practice of medicine contrary to the
9 provisions of NRS 630 or the regulations of the Board is an act, among others, that constitutes
10 grounds for initiating disciplinary action.

11 169. As demonstrated by, but not limited to, the above-outlined facts, Respondent aided
12 an unlicensed person to engage in the practice of medicine when Patient J received skin care, laser
13 treatment, and B-12 and Lipotrovite injections by Paddock on August 6, 2014.

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

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

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

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

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

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

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CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 17th day of May 2016; I served a file stamp copy of the COMPLAINT, PATIENT DESIGNATION & Fingerprinting Information, by mailing via USPS e-certified return receipt mail to the following:

Charles P. Virden, M.D.
960 Caughlin Crossing N., Ste. 100
Reno, NV 89519

Dated this 17th day of May, 2016.



Angelia L. Donohoe
Legal Assistant

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