

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

3 * * * * *

4 **In the Matter of Charges and**
5 **Complaint Against**
6 **KAREN RAE ABBOTT, M.D.,**
7 **Respondent.**

Case No. 18-29273-2

FILED

OCT 31 2018

NEVADA STATE BOARD OF
MEDICAL EXAMINERS

By: 

9 **COMPLAINT**

10 The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners (Board)
11 hereby issues this formal Complaint (Complaint) against Karen Rae Abbott, M.D. (Respondent), a
12 physician licensed in Nevada. After investigating this matter, the IC has a reasonable basis to
13 believe that Respondent has violated provisions of Nevada Revised Statutes (NRS) Chapter 630 and
14 Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical Practice Act). The IC
15 alleges the following facts:

16 1. Respondent was licensed (License No. 11149) in Nevada by the Board on September
17 10, 2004, and with scopes of practice listed as gynecology, infertility and urology.

18 2. Patient A was a 42-year-old female at the time of the events and her true identity is
19 not disclosed in this Complaint to protect her identity, but her identity is disclosed in the Patient
20 Designation contemporaneously served on Respondent with this Complaint.

21 3. On June 9, 2014, Patient A first presented to Respondent's office complaining of
22 heavy menses and pelvic pain. The medical records for this initial visit do not include the
23 patient's name or vital signs.

24 4. Patient A's medical history included two prior cesarean sections, a
25 cholecystectomy, an appendectomy, obesity, and lysis of intra-abdominal adhesions.

26 5. Patient A presented for follow-up appointments for her medical issues on June 17,
27

28 ¹ The Investigative Committee (IC) of the Nevada State Board of Medical Examiners (Board), at the time this formal
Complaint was authorized for filing, was composed of Board members Rachakonda D. Prabhu, M.D., Ms. Sandy
Peltyn and Victor M. Muro, M.D.

1 2014, July 14, 2014, July 30, 2014 and August 13, 2014. Patient A received a local anesthetic
2 injection in her abdomen to relieve pelvic pain at some of those follow-up appointments. With
3 regards to said follow-up appointments, medical records indicate very little documentation of
4 Patient A's complaints, vital signs, assessment and treatment plan.

5 6. On November 3, 2014, Patient A presented for a pre-operation appointment.

6 7. On November 7, 2014, Patient A underwent an operative laparoscopy with a right
7 ovarian cystectomy and lysis of the anterior abdominal wall adhesion and enterolysis followed by
8 a diagnostic and operative hysteroscopy with a hydrothermal ablation. This procedure was
9 performed as outpatient at Renown Regional Medical Center.

10 8. On the following day, November 8, 2014, Patient A was seen in the Emergency
11 Room at Banner Medical Center; her exam and vital signs were normal and she was discharged.

12 9. On November 10, 2014, and then on November 17, 2014, Patient A presented to
13 Respondent's office for postoperative appointments, and an exam determined that Patient A's vital
14 signs were appropriate for her postoperative state.

15 10. On November 22, 2014, Patient A was brought to Renown Regional Medical
16 Center and she was unconscious. It was determined that Patient A was suffering from septic
17 shock due to bowel perforations (likely caused during her November 7, 2014 surgery). General
18 surgery and internists treated her.

19 11. November 22, 2014, began a month-long complicated hospital stay that included
20 multiple surgeries, blood transfusions, total parenteral nutrition (TPN) and treatment for sepsis
21 induced encephalopathy. After approximately a month, Patient A was discharged and survived.

22 12. The medical records do not indicate any workup of this patient's symptoms or the
23 possible etiologies of her pains, or possible treatment options. The only treatment was to list the
24 surgery to be performed, which lacks any medical justification provided for by the Respondent in
25 the medical records.

26 13. The IC reviewed the findings from an Independent Medical Expert (IME), who
27 reviewed the medical records and additional relevant documentation and opined that Respondent's
28 acts and/or omissions violated the Medical Practice Act.

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COUNT I

NRS 630.301(4) (Malpractice)

14. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.

15. NRS 630.301(4) provides that malpractice by a physician is grounds for initiating disciplinary action against a licensee.

16. NAC 630.040 defines malpractice as the failure of a physician, in treating a patient, to use the reasonable care, skill, or knowledge ordinarily used under similar circumstances.

17. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when she treated Patient A.

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

COUNT II

NRS 630.3062(1)(a) (Failure to Maintain Complete Medical Records)

19. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.

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

21. Respondent failed to maintain timely, legible, accurate and complete medical records relating to the diagnosis, treatment and care of Patient A.

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

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

2 1. That the Nevada State Board of Medical Examiners give Respondent notice of the
3 charges herein against her and give her notice that she may file an answer to the Complaint herein
4 as set forth in NRS 630.339(2) within twenty (20) days of service of the Complaint;

5 2. That the Nevada State Board of Medical Examiners set a time and place for a
6 formal hearing after holding an Early Case Conference pursuant to NRS 630.339(3);

7 3. That the Nevada State Board of Medical Examiners determine what sanctions to
8 impose if it determines there has been a violation or violations of the Medical Practice Act
9 committed by Respondent;

10 4. That the Nevada State Board of Medical Examiners make, issue and serve on
11 Respondent its findings of fact, conclusions of law and order, in writing, that includes the
12 sanctions imposed; and

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

15 DATED this 22 day of October, 2018.

16 INVESTIGATIVE COMMITTEE OF THE
17 NEVADA STATE BOARD OF MEDICAL EXAMINERS

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19 By: 

20 Donald K. White, Esq., Deputy General Counsel
21 Attorney for the Investigative Committee
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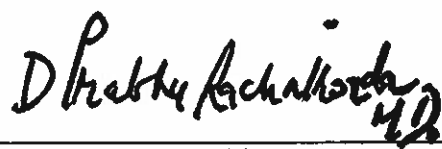
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VERIFICATION

STATE OF NEVADA)
 : ss.
COUNTY OF CLARK)

Rachakonda D. Prabhu, 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 22nd day of October, 2018.



Rachakonda D. Prabhu, M.D.
Chairman, Investigative Committee
Nevada State Board of Medical Examiners

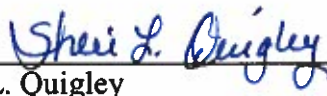
CERTIFICATE OF MAILING

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I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 31st day of October 2018; I served a filed copy of the formal COMPLAINT, PATIENT DESIGNATION, and fingerprint information, via U.S. mail to the following:

Edward J. Lemons
Lemons, Grundy & Eisenberg
6005 Plumas Street, Suite 300
Reno, Nevada 89519

Dated this 31st day of October, 2018.



Sheri L. Quigley
Legal Assistant