


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

3                                   \* \* \* \* \*

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5   **In the Matter of Charges and**  
6   **Complaint Against**  
7   **CHRISTOPHER SEUNG CHOI, M.D.,**  
8   **Respondent.**

Case No. 18-19369-01

**FILED**  
**SEP 16 2019**  
NEVADA STATE BOARD OF  
MEDICAL EXAMINERS  
By: 

9  
10                                   **FIRST AMENDED COMPLAINT**

11                   The Investigative Committee (IC) of the Nevada State Board of Medical Examiners (Board)  
12 hereby issues this First Amended Complaint (Complaint) against Christopher Seung Choi, M.D.  
13 (Respondent), a licensed physician in Nevada. After investigating this matter, the IC<sup>1</sup> has a  
14 reasonable basis to believe that Respondent has violated provisions of Nevada Revised Statutes  
15 (NRS) Chapter 630 and the Nevada Administrative Code (NAC) Chapter 630 (collectively the  
16 Medical Practice Act). The IC alleges the following facts:

17                   1. Respondent was licensed by the Board, pursuant to the provisions of the Medical  
18 Practice Act, on September 15, 2000, and at all times relevant to this First Amended Complaint,  
19 and is currently licensed in active status (License No. 9589).

20                   2. Patient A was a 90-year-old female at the time of the incidents in question. Her  
21 name is not disclosed in this Complaint to protect her identity, but her identity is disclosed in the  
22 Patient Designation contemporaneously served on Respondent with a copy of this First Amended  
23 Complaint.

24                   3. At the time of the events in question, Patient A was a resident of a nursing home in  
25 Las Vegas, Nevada, and suffered from dementia, among other conditions. Respondent treated  
26 certain patients there, including Patient A.

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28 <sup>1</sup>The Investigative Committee of the Nevada State Board of Medical Examiners, at the time of filing of this First Amended Complaint was approved, was composed of Board members Mr. M. Neil Duxbury, Chairman, Aury Nagy, M.D., and Michael C. Edwards, M.D., FACS.

1           4.       On October 7, 2014, at a location outside of the nursing home, Patient A  
2 underwent a procedure for installation of a pacemaker, with no apparent complications at that  
3 time.

4           5.       On October 20, 2014, Patient A complained of pain in her left hip and staff  
5 reported a popping noise from the hip area upon movement of left leg. Respondent ordered an x-  
6 ray, which showed no fracture or acute dislocation.

7           6.       On October 21, 2014, nursing staff noted that Patient A's left foot was cool to the  
8 touch and exhibited skin color changes.

9           7.       On October 21, 2014, a venous duplex ultrasound was performed. It revealed no  
10 evidence of a deep vein thrombosis. However, on the same date, an arterial duplex ultrasound  
11 revealed "no flow present" in Patient A's left proximal superficial femoral artery, left popliteal  
12 artery, left anterior and posterior tibial artery, and left dorsalis pedis artery. The report stated that  
13 there was "severe mild atherosclerotic plaquing in the left lower extremity with no detectable flow  
14 beyond the distal thigh." Further evaluation with a computed tomography (CT) angiogram was  
15 recommended. The results were faxed to Respondent on October 21, 2014.

16           8.       Later that day, Respondent saw Patient A. Respondent did not physically examine  
17 Patient A's lower left leg and foot that day. Respondent did not refer Patient A to a vascular  
18 surgeon for consultation in spite of nursing notes that Patient A's left leg was cool to the touch  
19 and exhibited skin color changes and in spite of Patient A continuing to experience pain in her  
20 left leg.

21           9.       On October 29, 2014, Patient A was taken by ambulance to the emergency  
22 department.

23           10.      On October 29, 2014, Patient A underwent an ultrasound of her lower left leg and  
24 an emergency angiograph, which showed total occlusion of the left limb aortic stent graft, left  
25 common iliac, external iliac and common femoral arteries. The attending surgeon's initial  
26 assessment was that the leg would have to be amputated either above or below the knee.

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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 16<sup>th</sup> day of September, 2019.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: Jasmine K Mehta  
Jasmine K. Mehta, Esq.  
Deputy Executive Director  
Attorney for the Investigative Committee

VERIFICATION

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STATE OF NEVADA            )  
  : ss.  
COUNTY OF WASHOE        )

Mr. M. Neil Duxbury, 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, he believes the allegations and charges in the foregoing Complaint against Respondent are true, accurate and correct.

Dated this 16<sup>th</sup> day of September, 2019.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: M. Neil Duxbury  
M. Neil Duxbury, Chairman

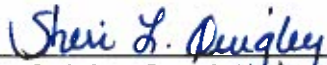
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**CERTIFICATE OF SERVICE**

I hereby certify that I am employed by Nevada State Board of Medical Examiners and on this day, I served a filed copy of the **FIRST AMENDED COMPLAINT**, via USPS e-certified return receipt mail to the following:

DR. CHRISTOPHER CHOI, M.D.  
c/o Eric K. Stryker, Esq.  
Wilson Elser Moskowitz Edelman & Dicker LLP  
300 South 4<sup>th</sup> Street  
Las Vegas, Nevada 89101

DATED this 16<sup>th</sup> day of September, 2019.

  
\_\_\_\_\_  
Sheri L. Quigley, Legal Assistant  
Nevada State Board of Medical Examiners

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