





1 11. Respondent failed to maintain complete medical records relating to the diagnosis,  
2 treatment and care of Patient A, by failing to document his actions when he treated Patient A,  
3 whose medical records were not timely, legible, accurate, and complete when he documented an  
4 incorrect diagnosis and did not update this error in a timely manner.

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

7 **COUNT III**

8 **(NRS 630.306(1)(b)(2) (Violation of Standards of Practice Established by Regulation)**

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

11 14. Violation of a standard of practice established by regulation of the Board is  
12 grounds for imitating disciplinary action pursuant to NRS 630.306(1)(b)(2).

13 15. NAC 630.210 requires a physician to seek consultation with another provider of  
14 health care in doubtful or difficult cases whenever it appears that consultation may enhance the  
15 quality of medical services.

16 16. Respondent failed to timely seek consultation with regard to Patient A's medical  
17 condition of craniopharyngioma. Respondent should have consulted with an appropriate care  
18 provider to address the doubtfulness of the diagnosis of this condition. This consultation would  
19 have confirmed or denied such a diagnosis rather than Respondent's incorrect diagnosis of  
20 malignant brain neoplasm.

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

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

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

27 3. That the Board determine what sanctions to impose if it determines there has been  
28 a violation or violations of the Medical Practice Act committed by Respondent;


1           4.       That the Board award fees and costs of the investigation and prosecution of this  
2 case as outlined in NRS 622.400;

3           5.       That the Board make, issue and serve on Respondent its findings of fact,  
4 conclusions of law and order, in writing, that includes the sanctions imposed; and

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

7 DATED this 16<sup>th</sup> day of July, 2021.

8 INVESTIGATIVE COMMITTEE OF THE  
9 NEVADA STATE BOARD OF MEDICAL EXAMINERS

10 By:   
11 \_\_\_\_\_  
12 ROBERT G. KILROY, J.D.  
13 Senior Deputy General Counsel  
14 9600 Gateway Drive  
15 Reno, NV 89521  
16 Tel: (775) 688-2559  
17 Email: [rkilroy@medboard.nv.gov](mailto:rkilroy@medboard.nv.gov)  
18 *Attorney for the Investigative Committee*

VERIFICATION

1 STATE OF NEVADA )  
2 : ss.  
3 COUNTY OF CLARK )

4 Victor M. Muro, M.D., Chairman, having been duly sworn, hereby deposes and states  
5 under penalty of perjury that he is the Chairman of the Investigative Committee of the Nevada  
6 State Board of Medical Examiners that authorized the Complaint against the Respondent herein;  
7 that he has read the foregoing Complaint; and that based upon information discovered in the  
8 course of the investigation into a complaint against Respondent, he believes that the allegations  
9 and charges in the foregoing Complaint against Respondent are true, accurate and correct.

10 DATED this 16<sup>th</sup> day of July, 2021.

11 INVESTIGATIVE COMMITTEE OF THE  
12 NEVADA STATE BOARD OF MEDICAL EXAMINERS

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15 Victor M. Muro, M.D.,  
16 *Chairman of the Investigative Committee*