BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * * *

In the Matter of Charges and Complaint

Case No. 22-46417-1

Against:

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ELENA GERAYMOVYCH, M.D.

Respondent.

FILED

FEB 0 9 2022

NEVADA STATE BOARD OF MEDIGAL EXAMINERS

COMPLAINT

The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners (Board), by and through Donald K. White, J.D., Senior Deputy General Counsel and attorney for the IC, having a reasonable basis to believe that Elena Geraymovych, 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:

- Respondent was at all times relative to this Complaint a medical doctor holding an 1. active license to practice medicine in the State of Nevada (License No. 16838). Respondent was originally licensed by the Board on December 13, 2016.
 - 2. Patient A² was a seventy-eight (78) year-old male at the time of the events at issue.
 - On July 31, 2017, Patient A presented to Respondent as a new patient. 3.
- Patient A complained of vitreous floaters in his eyes, of which Respondent noted 4. Patient A had significant floaters and recommend vitrectomy surgery.

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Complaint was authorized for filing, was composed of Board members Victor M. Muro, M.D., Chairman, Aury Nagy, M.D., and Ms. Maggie Arias-Petrel. ² Patient A's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time this formal

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- 5. Respondent's examination notes revealed healthy eyes and normal optic nerve examination in both eyes. The notes also reflected pseudophakia and laser scarring in the left eye from prior laser treatment.
- Of note, the records also indicated intraocular pressure of 26 in the right eye and 37 6. in the left eye. There is no comment regarding the elevated intraocular pressure.
- Patient A was instructed to schedule a pre-operative appointment and to schedule 7. vitrectomy surgery, but due to another medical issue, Patient A did not return to see Respondent again until September 27, 2018.
- 8. On September 27, 2018, Patient A complained of worsening floaters in his eyes, and wanted to schedule his vitrectomy surgery. His intraocular pressures had increased to 34 in the right eye and 37 in the left eye.
- At this visit, Respondent noted the increased pressures, referred Patient A to a 9. glaucoma specialist, and instructed Patient A to call to schedule his vitrectomy surgery.
- On October 10, 2018, Patient A saw the glaucoma specialist where the intraocular 10. pressures were noted as 41 in the right eye and 45 in the left eye. At this visit, it was noted that Patient A had some optic nerve damage and a diagnosis of pseudo-exfoliation glaucoma.

COUNT I

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

- 11. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- Violation of a standard of practice adopted by the Board is grounds for disciplinary 12. action pursuant to NRS 630.306(1)(b)(2).
- NAC 630.210 requires a physician to "seek consultation with another provider of 13. health care in doubtful or difficult cases whenever it appears that consultation may enhance the quality of medical services."
- Respondent failed to timely seek consultation with regard to Patient A's elevated 14. intraocular pressure of which Respondent was aware on July 31, 2017. Respondent should have timely consulted with a glaucoma specialist to address the elevated intraocular pressure, and such

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a timely consultation may have enhanced the quality of medical care by addressing the chance that Patient A would develop glaucoma.

By reason of the foregoing, Respondent is subject to discipline by the Nevada State 15. Board of Medical Examiners as provided in NRS 630.352.

WHEREFORE, the Investigative Committee prays:

- That the Board give Respondent notice of the charges herein against her and give 1. her notice that she 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;
- That the Board set a time and place for a formal hearing after holding an Early 2. Case Conference pursuant to NRS 630.339(3);
- That the Board determine what sanctions to impose if it determines there has been 3. a violation or violations of the Medical Practice Act committed by Respondent;
- That the Board award fees and costs for the investigation and prosecution of this 4. case as outlined in NRS 622.400;
- That the Board make, issue and serve on Respondent its findings of fact, 5. conclusions of law and order, in writing, that includes the sanctions imposed; and
- That the Board take such other and further action as may be just and proper in these 6. premises.

DATED this **M** day of February, 2022.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

DONALD K. WHITE, J.D.

Senior Deputy General Counsel

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Reno, NV 89521

Tel: (775) 688-2559

Email: dwhite@medboard.nv.gov

Attorney for the Investigative Committee

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners

VERIFICATION

STATE OF NEVADA) : ss. COUNTY OF CLARK)

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

DATED this day of February, 2022.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: /mm

VICTOR M. MURO, M.D.

Chairman of the Investigative Committee