## BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

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In the Matter of Charges and Complaint

Case No. 22-367-1

Against:

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ET ED

PAMELA ELAINE ALBO, PA-C,

MAR - 1 2022

Respondent.

NEVADA STATE BOARD OF MEDICAL EXAMINERS

**COMPLAINT** 

The Investigative Committee<sup>1</sup> (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 Pamela Elaine Albo, PA-C, (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 physician assistant holding 1. an active license to practice medicine in the State of Nevada (License No. 608). Respondent was originally licensed by the Board on September 14, 1999.
- In or about June 2019, the Board became aware that Respondent did not notify the 2. Board, in writing, within seventy-two (72) hours of the change(s) of her supervising physician(s).
- Pursuant to NAC 630.360(4), this notification is the responsibility of the physician 3. assistant.

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<sup>&</sup>lt;sup>1</sup> The Investigative Committee of the Nevada State Board of Medical Examiners, at the time this formal Complaint was authorized for filing, was composed of Board members Victor M. Muro, M.D., Weldon Havins, M.D., J.D., and Ms. Maggie Arias-Petrel.

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### **COUNT I**

### NRS 630.306(1)(p) – Engaging in Unprofessional Conduct

- 4. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- Engaging in any act that is unsafe or unprofessional conduct in accordance with 5. regulations adopted by the Board constitutes grounds for intitiating disciplinary action pursuant to NRS 630.306(1)(p).
  - NAC 630.360(4) states: 6.
    - ... a physician assistant shall notify the Board in writing within 72 hours after any change in the supervision of the physician assistant by a supervising physician.
- By reason of the foregoing, Respondent is subject to discipline by the Nevada State 7. 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

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# OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners

9600 Gateway Drive Reno, Nevada 89521 (775) 688-2559

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

DATED this \_\_\_\_\_\_day of March, 2022.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

DONALD K. WHITE, J.D. Senior Deputy General Counsel

9600 Gateway Drive 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 15th day of March, 2022.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

VICTOR M. MURO, M.D.

Chairman of the Investigative Committee