

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

3 \* \* \* \* \*

4  
5 **In the Matter of Charges and Complaint**

**Case No. 23-33332-1**

6 **Against:**

**FILED**

7 **JONATHAN RICHARD SORELLE, M.D.,**

**MAY 26 2023**

8 **Respondent.**

9 **NEVADA STATE BOARD OF  
MEDICAL EXAMINERS**  
By: \_\_\_\_\_

10 **COMPLAINT**

11 The Investigative Committee<sup>1</sup> (IC) of the Nevada State Board of Medical Examiners  
12 (Board), by and through Ian J. Cumings, Deputy General Counsel and attorney for the IC, having a  
13 reasonable basis to believe that Jonathan Richard Sorelle, M.D. (Respondent) violated the provisions  
14 of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter  
15 630 (collectively, the Medical Practice Act), hereby issues its Complaint, stating the IC's charges  
16 and allegations as follows:

17 1. Respondent was at all times relative to this Complaint a medical doctor holding an  
18 active license to practice medicine in the State of Nevada (License No. 12562). Respondent was  
19 originally licensed by the Board on December 12, 2007.

20 2. Patient A<sup>2</sup> was a sixty-three (63) year-old male at the time of the events at issue.

21 3. On October 31, 2019, Patient A presented to the Respondent for medical treatment  
22 following a fall he sustained on October 4, 2019.

23 4. Diagnostic imaging taken on October 21, 2019 demonstrated Patient A suffered  
24 scapholunate dissociation and had osteoarthritis of the right wrist.

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27 <sup>1</sup> The Investigative Committee of the Nevada State Board of Medical Examiners, at the time this formal  
28 Complaint was authorized for filing, was composed of Board members Bret W. Frey, M.D. and Col. Eric D. Wade (USAF) Ret.

<sup>2</sup> 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 5. Respondent erroneously diagnosed Patient A with right carpal tunnel syndrome,  
2 right SLIO tear, and an avulsion fracture of the lunate.

3 6. Respondent recommended revision surgery and scheduled Patient A for open  
4 reduction internal fixation of the lunate on November 12, 2019.

5 7. On November 5, 2019, a preoperative MRI confirmed Patient A had stage 3  
6 scapholunate advanced collapse pattern arthritis, which requires a scaphoidectomy and midcarpal  
7 fusion to correct.

8 8. On November 11, 2019, Respondent reviewed the November 5, 2019, MRI and  
9 changed the planned surgery which had been discussed with the patient to the appropriate  
10 procedure but failed to obtain new informed consent prior Patient A presenting for surgery on  
11 November 12, 2019.

12 9. On November 12, 2019, Patient A presented for surgery. Only after the  
13 administration of anesthesia was Patient A informed of the change in the surgical plan, and  
14 therefore was not properly given informed consent prior to surgery being performed.

15 **COUNT I**

16 **NRS 630.301(4) - Malpractice**

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

19 11. NRS 630.301(4) provides that malpractice of a Physician is grounds for initiating  
20 disciplinary action against a licensee.

21 12. NAC 630.040 defines malpractice as “the failure of a physician, in treating a  
22 patient, to use the reasonable care, skill, or knowledge ordinarily used under similar  
23 circumstances.”

24 13. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed  
25 to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when  
26 rendering medical services to Patient A as demonstrated by the initial misdiagnosis of the patient’s  
27 chronic arthritis and scapholunate dissociation. Moreover, Respondent failed to obtain proper  
28 informed consent before the patient received sedation prior to performing surgery.

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

3 **COUNT II**

4 **NRS 630.3062(1)(a) - Failure to Maintain Proper Medical Records**

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

7 16. NRS 630.3062(1)(a) provides that the “failure to maintain timely, legible, accurate  
8 and complete medical records relating to the diagnosis, treatment and care of a patient” constitute  
9 grounds for initiating discipline against a licensee.

10 17. Respondent failed to maintain proper medical records relating to the diagnosis,  
11 treatment and care of Patient A, by failing to correctly obtain informed consent of the patient prior  
12 to performing surgery.

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

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

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

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

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

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

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

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

DATED this 26<sup>th</sup> day of May, 2023.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

  
\_\_\_\_\_  
IAN J. CUMINGS

Deputy General Counsel

9600 Gateway Drive

Reno, NV 89521

Tel: (775) 688-2559

Email: [icumings@medboard.nv.gov](mailto:icumings@medboard.nv.gov)

*Attorney for the Investigative Committee*

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VERIFICATION

STATE OF NEVADA        )  
                                  : ss.  
COUNTY OF WASHOE    )

Bret W. Frey, 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 26 day of May, 2023.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:



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BRET W. FREY, M.D.

*Chairman of the Investigative Committee*

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**CERTIFICATE OF SERVICE**

I hereby certify that I am employed by the Nevada State Board of Medical Examiners and that on the 26th day of May, 2023, I served a file-stamped copy of the foregoing **COMPLAINT** as well as file-stamped copy of the **PATIENT DESIGNATION** and required fingerprinting materials, via USPS Certified Mail, postage pre-paid, to the following parties:

JONATHAN RICHARD SORELLE, M.D.  
9080 West Post Road, Suite #200  
Las Vegas, NV 89148

Tracking No.: 9171 9690 0935 0255 6999 64

DATED this 26<sup>th</sup> day of May, 2023.

  
\_\_\_\_\_  
MERCEDES FUENTES  
Legal Assistant  
Nevada State Board of Medical Examiners