

1 preparations to manage her difficult airway prior to initiating her anesthetic care on or about
2 August 23, 2015.

3 22. By reason of the foregoing, Respondent is subject to discipline by the Board as
4 provided in NRS 630.352.

5 **COUNT II**

6 **NRS 630.3062(1)(a) – Failure to Maintain Accurate and Complete Medical Records**

7 23. All of the allegations contained in the above paragraphs are hereby incorporated by
8 reference as though fully set forth herein.

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

12 25. Respondent failed to maintain complete medical records relating to the diagnosis,
13 treatment and care of Patient A by failing to accurately record her oxygen levels; failing to
14 document her levels of hypoxia, bradycardia, and cyanosis; and failing to document how he
15 managed her airway during her procedure on or about August 23, 2015.

16 26. By reason of the foregoing, Respondent is subject to discipline by the Board as
17 provided in NRS 630.352.

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

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

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

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

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

28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

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

DATED this 27th day of July, 2023.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: Brandee Mooneyhan
BRANDEE MOONEYHAN
Deputy General Counsel
9600 Gateway Drive
Reno, NV 89521
Tel: (775) 688-2559
Email: mooneyhanb@medboard.nv.gov
Attorney for the Investigative Committee

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

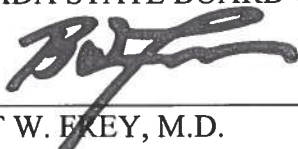
VERIFICATION

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 27th day of July, 2023.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 
BRET W. FREY, M.D.
Chairman of the Investigative Committee