





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

4           15.     Respondent failed to maintain complete medical records relating to the diagnosis,  
5 treatment, and care of Patient A, by failing to correctly obtain and note Patient A’s reason for  
6 referral.

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

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

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

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

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

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

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

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**OFFICE OF THE GENERAL COUNSEL**

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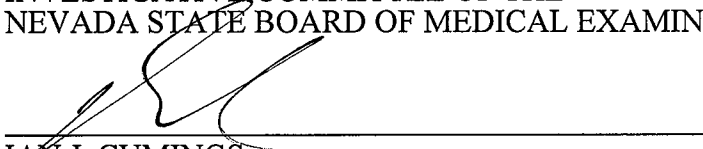
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6. That the Board take such other and further action as may be just and proper in these premises.

DATED this 8<sup>th</sup> day of June, 2023.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:



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