

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

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4
5 **In the Matter of Charges and Complaint**
6 **Against:**
7 **EJO MANNAPARAMBIL JOHN, M.D.,**
8 **Respondent.**

Case No. 24-45177-1

FILED

FEB 23 2024

**NEVADA STATE BOARD OF
MEDICAL EXAMINERS**

By: _____

9
10 **COMPLAINT**

11 The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners
12 (Board), by and through Donald K. White, Senior Deputy General Counsel and attorney for the IC,
13 having a reasonable basis to believe that Ejo Mannaparambil John, M.D. (Respondent) violated the
14 provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC)
15 Chapter 630 (collectively, the Medical Practice Act), hereby issues its Complaint, stating the IC's
16 charges 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. 17896). Respondent was
19 originally licensed by the Board on May 10, 2018.

20 2. Patient A² was a forty-seven (47) year-old female at the time of the events at issue.

21 3. On or about January 1, 2019, Patient A presented to the emergency room via
22 ambulance with a complaint of pain over her entire body. It was determined, through
23 conversations with Patient A's family that she was suffering from alcohol withdrawal and was
24 currently under the influence of opioid medication and had fallen and cut her face.

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¹ 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 Carl N. William, Jr.,
M.D.

² Patient A's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

1 infusion causing Patient A's sodium serum levels to rise uncontrollably without proper interval
2 testing, which should have been every two (2) hours instead of every six (6) hours.

3 13. 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 630.306(1)(b)(2) - Violation of Standards of Practice Established by Regulation**

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

9 15. Violation of a standard of practice adopted by the Board is grounds for disciplinary
10 action pursuant to NRS 630.306(1)(b)(2).

11 16. NAC 630.210 requires a physician to "seek consultation with another provider of
12 health care in doubtful or difficult cases whenever it appears that consultation may enhance the
13 quality of medical services."

14 17. Respondent failed to timely seek consultation with regard to Patient A's medical
15 condition and rapid correction on January 1, 2019, and Respondent should have consulted with an
16 appropriate care provider to address the doubtfulness of the diagnosis of Patient A's medical
17 condition and such a timely consultation would have confirmed or denied such a diagnosis and
18 may have enhanced the quality of medical care provided to Patient A regarding treatment of her
19 hyponatremia. A nephrology consult was requested, but long after Patient A had been exhibiting
20 symptoms of rapid correction in her serum sodium levels.

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

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WHEREFORE, the Investigative Committee prays:

1. That the Board give Respondent notice of the charges herein against him and give him notice that he 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;

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

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

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

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 23rd day of February, 2024.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

DONALD K. WHITE
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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 23rd day of February, 2024.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

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