

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. 24-40992-1

6 **Against:**

7 **KALYAN CHAKRAVARTHY TATINENY, M.D.**

8 **Respondent.**

FILED

OCT 24 2024

**NEVADA STATE BOARD OF
MEDICAL EXAMINERS**

By: 

9
10 **COMPLAINT**

11 The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners (Board),
12 by and through William P. Shogren, Deputy General Counsel and attorney for the IC, having a
13 reasonable basis to believe that Kalyan Chakravarthy Tatineny, 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 physician holding an active
18 license to practice medicine in the State of Nevada (License No. 14773). Respondent was originally
19 licensed by the Board on April 22, 2013.

20 2. Patient A² was a thirty-four (34) year-old female at the time of the events at issue.

21 3. On March 13, 2018, Patient A presented to the emergency department at St. Rose
22 Dominican Hospital Siena Campus (St. Rose Hospital). Patient A reported that she had a
23 chiropractic neck adjustment earlier in the day and afterwards experienced neck pain, dizziness, and
24 vomiting.

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27 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., Col. Eric D. Wade, USAF
(Ret.), and Carl N. Williams, Jr., M.D., FACS.

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 4. Patient A then underwent a computed tomography angiogram (CTA) of her head and
2 neck. Respondent, a radiologist, interpreted the CTA results on March 13, 2018. In his report,
3 Respondent noted that Patient A’s basilar artery and posterior cerebral arteries were unremarkable
4 and that Patient A’s right and left common carotid arteries were normal. Respondent’s report
5 concluded with an impression of “[n]o acute brain or neck CTA abnormality.”

6 5. However, the CTA scan clearly demonstrated a change in caliber of the right distal
7 vertebral artery. Given Patient A’s recent history of neck adjustment, her symptoms reported upon
8 presentation at St. Rose Hospital, and the CTA scan results, Patient A demonstrated a high suspicion
9 of vertebral artery dissection. Respondent failed to identify or note in his report a possible vertebral
10 artery dissection.

11 6. Patient A was discharged from St. Rose Hospital on March 14, 2018, with
12 instructions on how to manage her symptoms.

13 7. On March 16, 2018, Patient A underwent an MRI of her head and neck. Another
14 physician interpreted the MRI results and included in his report an impression of “dissection of the
15 right distal cervical vertebral artery.”

16 8. That same day, Patient A returned to St. Rose Hospital where a neurologist reviewed
17 Patient A’s CTA from March 13, 2018, as well as the MRI conducted on March 16, 2018. The
18 neurologist noted that the March 13, 2018, CTA demonstrated a focal right vertebral artery
19 dissection.

20 **COUNT I**

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

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

24 10. NRS 630.301(4) provides that malpractice of a physician is grounds for initiating
25 disciplinary action against a licensee.

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

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1 12. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed
2 to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when
3 rendering medical services to Patient A by failing to identify and note a possible vertebral artery
4 dissection on Patient A's CTA scan from March 13, 2018.

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

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

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

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

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

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

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

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

21 DATED this 24th day of October 2024.

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23 INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

24
25 By: 

26 WILLIAM P. SHOGREN

Deputy General Counsel

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Reno, NV 89521

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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 24th day of October, 2024.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

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