



1 enough that Patient A required assistance with daily living and that she had a limited range of  
2 motion in general.

3 5. Beginning October 11, 2021, and forward thereafter, Respondent was the  
4 responsible care provider for Patient A at all times relevant to this Complaint.

5 6. On November 8, 2021, Patient A was found on the floor by a CNA, which noted  
6 that she discovered Patient A lying on the floor after she fell from her bed. Patient A then had to  
7 be assisted into a chair. Respondent was notified of this event and ordered to continue monitoring.

8 7. Respondent's subsequent progress notes contained only limited documentation of a  
9 musculoskeletal exam, and that section of the exam remained identical to previous notes in  
10 multiple subsequent medical notes.

11 8. On November 13, 2021, Patient A was seen by a RN, who documented that  
12 Patient A's daughter had reported that Patient A had "bilateral lower extremity pain" and a  
13 "limited range of motion." Upon learning this information, the RN ordered a right hip x-ray and a  
14 lower extremity doppler.

15 9. On November 13, 2021, the results of the imaging were reported, with the  
16 radiologist commenting that there was a "minimally impacted fracture of femoral neck," and an  
17 "acute right hip [fracture]."

18 10. On November 14, 2021, Respondent saw Patient A and noted in his assessment,  
19 that Patient A had a physical debility, hypertension, cognitive disorder, "pain of right lower  
20 extremity: improved continue symptomatic treatment," seizure disorder, anemia, and dysphagia.  
21 Absent from the assessment, was any discussion of the acute right hip fracture, and Respondent  
22 failed to take action to treat the fracture.

23 11. On November 15, 2021, a nurse ordered Patient A's transfer to a Las Vegas  
24 emergency room for treatment of a right hip fracture.

25 **COUNT I**

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

27 12. All of the allegations contained in the above paragraphs are hereby incorporated by  
28 reference as though fully set forth herein.





OFFICE OF THE GENERAL COUNSEL  
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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 27th day of March, 2024

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

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