

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 **RALPH MARCUS VENNART, M.D.,**
8 **Respondent.**

Case No. 24-8686-1

FILED

JUN 03 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 Alexander J. Hinman, Deputy General Counsel and attorney for the IC,
13 having a reasonable basis to believe that Ralph Marcus Vennart, 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. 6084). Respondent was
19 originally licensed by the Board on July 1, 1990, with a specialty in obstetrics and gynecology.

20 2. Patient A² was a forty-five (45) year-old female at the time of the events at issue.

21 3. On August 17, 2020, Respondent performed a consultation with Patient A,
22 regarding sterilization and removal of a retained IUD with non-viable string. Respondent
23 determined that Patient A's past medical history was too significant for two Loop Electrical
24 Excision Procedures (a treatment to remove precancerous cells from the cervix) and that Patient
25 A's cervix was flush with the vaginal apex.

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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.

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. On November 9, 2020, Patient A had a pre-operative planning visit with
2 Respondent, where he discussed an operative laparoscopy with bilateral salpingectomy for
3 elective sterilization, hysteroscopic removal of an intrauterine device (IUD), and a NovaSure
4 ablation procedure (a procedure that removes the lining of the uterus).

5 5. On November 19, 2020, Patient A presented to Respondent for the procedures
6 previously discussed.

7 6. During the procedure, Respondent attempted to perform the NovaSure ablation
8 three (3) times without success. During those repeated attempts he created vaginal tears, and
9 eventually Respondent abandoned the NovaSure ablation, and the vaginal lacerations created by
10 the single tooth tenaculum were sutured.

11 7. Respondent did not indicate anywhere in Patient A's record that he performed an
12 examination under anesthesia, nor was there any indication that he performed an ultrasound of the
13 cervix or uterus to establish the appropriate length or measurements of the cervix and uterus prior
14 to the procedure.

15 8. On December 1, 2020, Patient A saw Respondent for her first, and what would be
16 her only post-operative visit. Respondent reportedly told Patient A he had attempted to do the
17 NovaSure ablation three (3) times but was unsuccessful. This was the first time Patient A became
18 aware that she had experienced multiple vaginal lacerations during the procedure.

19 9. Respondent scheduled a follow-up appointment; however, it was not for three (3)
20 months later, on March 1, 2021.

21 10. On December 2, 2020, a day after the post-operative visit, Patient A experienced
22 symptoms consistent with a urinary tract infection (UTI) and called Respondent's office multiple
23 times requesting a prescription to treat a UTI. The prescription was delayed three (3) days,
24 despite staff being aware that the patient was a post-operative patient of Respondent's.

25 11. On December 5, 2020, Patient A felt an initial "gush" of urine. She contacted
26 Respondent's office and provided a urine sample thereafter.

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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 3rd day of June, 2024.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

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