

1 4. While at Mountainview, Patient A was found to have an elevated white blood cell
2 (WBC) count of 13.3, indicative of possible infection, and a blood urea nitrogen (BUN) of 23 and
3 creatinine of 16.4, both indicative of possible mild kidney infection.

4 5. On February 6, 2020, Mountainview staff decided that Patient A's acute presenting
5 symptoms, including his elevated WBC count, had resolved. Patient A was discharged to The
6 Heights of Summerlin (Heights), a skilled nursing facility, for rehabilitation.

7 6. On February 6, 2020, Respondent, an internist at Heights, assumed care of Patient
8 A. Respondent noted Patient A's admission diagnoses included debility, diabetes, hypertension,
9 flu-like symptoms, urinary incontinence, chronic kidney disease, and possible dehydration.
10 Respondent's plan for Patient A included obtaining baseline labs, a urinalysis, a bladder and renal
11 sonogram to rule out any kidney stones and checking the prostate-specific antigen (PSA) level for
12 prostate issues.

13 7. On February 10, 2020, Heights staff collected a urine sample from Patient A, at
14 which time the urinalysis showed several abnormal results indicating a possible urinary infection,
15 including an elevated WBC count of 21-50, cloudy urine, and a few bacteria. The urinalysis also
16 showed the presence of many calcium oxalate crystals, indicative of potential kidney stone
17 formation.

18 8. On February 12, 2020, Patient A's lab results showed an elevated PSA level of
19 4.92, indicating possible prostatitis. Patient A's lab results also showed a markedly elevated
20 hemoglobin A1C level of 10.3 and a markedly elevated glucose level of 243, both indicating
21 hyperglycemia.

22 9. Between on or about February 12, 2020, and on or about February 16, 2020,
23 Respondent repeatedly examined Patient A. However, Respondent's notes from these
24 examinations are limited and contain only brief and limited physical examinations. Respondent's
25 notes do not specifically address or mention any follow up on Patient A's abnormal urinalysis
26 from February 10, 2020, or Patient A's elevated PSA level and hyperglycemia from February 12,
27 2020, and lack documentation of an inquiry into related urinary symptoms or an examination of
28 Patient A's genitourinary system.

1 hyperglycemia, elevated hemoglobin A1C level, and elevated PSA. Respondent further failed to
2 document Patient A's persistent erection from at least February 17, 2020, to February 19, 2020.

3 23. By reason of the foregoing, Respondent is subject to discipline by the Board as
4 provided in NRS 630.352.

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

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

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

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

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


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

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

19 DATED this 7th day of November, 2024.

20 INVESTIGATIVE COMMITTEE OF THE
21 NEVADA STATE BOARD OF MEDICAL EXAMINERS

22 By:


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VERIFICATION

STATE OF NEVADA)
 : ss.
COUNTY OF CLARK)

Nick M. Spirtos, M.D., F.A.C.O.G., 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 8th day of November, 2024.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

NICK M. SPIRTOS, M.D., F.A.C.O.G., M.D.
Chairman of the Investigative Committee