

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. 24-50383-1

6 **Against:**

FILED

7 **SRIVATHSA CHELUR**

DEC - 6 2024

8 **VEERARAGHAVAN, M.D.,**

NEVADA STATE BOARD OF
MEDICAL EXAMINERS

9 **Respondent.**

By: 

10
11 **COMPLAINT**

12 The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners
13 (Board), by and through Donald K. White, Senior Deputy General Counsel and attorney for the IC,
14 having a reasonable basis to believe that Srivathsa Chelur Veeraraghavan, M.D. (Respondent)
15 violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative
16 Code (NAC) Chapter 630 (collectively, the Medical Practice Act), hereby issues its Complaint,
17 stating the IC's charges and allegations as follows:

18 1. Respondent was at all times relative to this Complaint a medical doctor holding an
19 active license to practice medicine in the State of Nevada (License No. 18826). Respondent was
20 originally licensed by the Board on April 18, 2019.

21 2. Patient A² was a forty-eight (48) year-old male at the time of the events at issue.

22 3. On October 13, 2019, Patient A fell on his right hand and was taken to Sunrise
23 Hospital for evaluation of the injury.

24 4. X-rays were taken of Patient A's right wrist at Sunrise Hospital while in the
25 emergency room.

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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 Victor M. Muro, M.D., Aury Nagy, M.D., and
Ms. Maggie Arias-Petrel.

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

1 5. Respondent reviewed the three (3) views of X-rays and found no evidence of
2 dislocation or fracture from his review of the tests. This information was provided in a report to the
3 emergency room physician.

4 6. The emergency room physician discharged Patient A, and based on Respondent's
5 report, placed Patient A in a splint and asked Patient A to follow up with an orthopedic physician
6 and his primary care physician.

7 7. On October 26, 2019, additional X-rays were taken by his primary care provider.
8 These X-rays indicated a dorsal fracture dislocation of the fourth and fifth metacarpal bones and an
9 avulsion fracture.

10 8. The X-rays taken at Sunrise Hospital actually demonstrated the same changes as the
11 October 26, 2019, X-rays — a clear dorsal dislocation of the fourth and fifth carpometacarpal joints
12 with an adjacent avulsion fracture.

13 9. Patient A's injuries could not be timely or properly addressed in the hospital due to
14 reliance by the emergency room physician on the incorrect reading of the Sunrise Hospital
15 X-rays by Respondent.

16 10. Patient A was later referred to an orthopedic physician by his primary care doctor
17 once the correct reading of the October 26, 2019, X-rays was obtained.

18 **COUNT I**

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

20 11. All of the allegations contained in the above paragraphs are hereby incorporated by
21 reference as though fully set forth herein.

22 12. NRS 630.301(4) provides that malpractice of a physician is grounds for initiating
23 disciplinary action against a licensee.

24 13. NAC 630.040 defines malpractice as "the failure of a physician, in treating a patient,
25 to use the reasonable care, skill, or knowledge ordinarily used under similar circumstances."

26 14. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed
27 to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when

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1 rendering medical services to Patient A when he improperly read an X-ray of Patient A's wrist and
2 missed a fracture shown in the X-ray.

3 15. 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 Case
10 Conference pursuant to NRS 630.339(3);

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

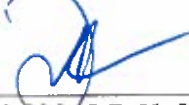
13 4. That the Board award fees and costs for the investigation and prosecution of this case
14 as outlined in NRS 622.400;

15 5. That the Board make, issue and serve on Respondent its findings of fact, conclusions
16 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 6th day of December, 2024.

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

22 By: 

23 DONALD K. WHITE
24 Senior Deputy General Counsel
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26 Reno, NV 89521
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Attorney for the Investigative Committee

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VERIFICATION

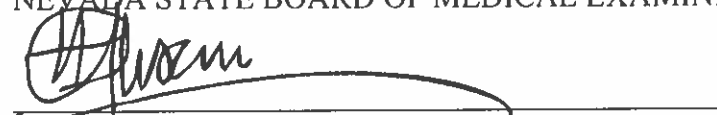
STATE OF NEVADA)
 : ss.
COUNTY OF CLARK)

Chowdhury H. Ahsan, M.D., Ph.D., FACC, 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 6th day of December, 2024.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:



CHOWDHURY H. AHSAN, M.D., PH.D., FACC
Chairman of the Investigative Committee