

1 **BEFORE THE BOARD OF MEDICAL EXAMINERS**
2 **OF THE STATE OF NEVADA**

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4
5 **In the Matter of the Charges and Complaint**
6 **Against:**
7 **GEORGE PETER CHAMBERS, JR., M.D.,**
8 **Respondent.**

Case No.: 24-27891-1

FILED

JUL - 9 2024

NEVADA STATE BOARD OF
MEDICAL EXAMINERS

By: 

9
10 **FIRST-AMENDED COMPLAINT**

11 The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners
12 (Board) hereby issues this formal Complaint against George Peter Chambers, Jr., M.D.
13 (Dr. Chambers), a licensed physician in Nevada. After investigating this matter, the IC has a
14 reasonable basis to believe that Respondent has violated provisions of Nevada Revised Statutes
15 (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the
16 Medical Practice Act).

17 1. Respondent is a medical doctor currently licensed in the State of Nevada by the
18 Board in active-probation status (License No. 10476) since October 2, 2023, pursuant to the
19 provisions of NRS Chapter 630. Respondent was originally licensed by the Board on
20 April 30, 2003.

21 2. On September 15, 2023, at the Board's regularly scheduled meeting, Respondent
22 was found to have violated the Medical Practice Act by violating two (2) counts of
23 NRS 630.301(7), Engaging in Conduct That Violates the Trust of a Patient and Exploits the
24 Relationship with the Patient for Financial or Other Personal Gain; one (1) count of
25 NRS 630.306(1)(g), Continual Failure to Practice Medicine Properly; and one (1) count of
26 NRS 630.301(9), Disreputable Conduct.

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28 ¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time the filing of this
Complaint was approved, was composed of Bret W. Frey, M.D., Col. Eric D. Wade, USAF (Ret.), and Carl N.
Williams, Jr., M.D., FACS.

1 3. On October 23, 2023, at 11:54 a.m., Respondent was served via USPS Certified
2 Mail (tracking no. 9171969009350241557513) with the Board’s Findings of Fact, Conclusions of
3 Law and Order (FFCLO), filed by the Board on October 2, 2023, in Case No. 22-27891-1, which
4 provided explicit instructions regarding his specific requirements and deadlines to achieve
5 compliance with the Board’s Order.

6 4. The Board’s Order clearly stated that Respondent was ordered to complete the
7 following terms:

8 a. Sign an appropriate release with CPEP and complete and unconditionally
9 pass the PROBE Ethics & Boundaries Course offered by CPEP on or before March 15, 2024.²

10 b. Satisfactorily complete the Professional Boundaries Program through
11 PACE at the University of San Diego by March 15, 2024.

12 c. Reimburse the Board the reasonable costs and expenses actually incurred in
13 the investigation and prosecution of this case in the amount of fifty-four thousand two hundred
14 seventeen dollars and thirty-seven cents (\$54,217.37) by March 15, 2024; and

15 d. Pay fines in the amount of one thousand five hundred dollars (\$1,500) for
16 each count found proven, for a total of six thousand dollars (\$6,000), by March 15, 2024.

17 5. On March 15, 2024, Dr. Chambers, through his counsel, submitted a Petition to
18 Extend Certain Deadlines (Petition) via email that was received at 6:49 p.m. that day.

19 6. In that Petition, Dr. Chambers asked for additional time to complete the
20 requirements detailed above in 2(a), (c), and (d).

21 7. Specifically, Dr. Chambers requested that he have three (3) additional months to
22 complete these requirements and/or by June 15, 2024.

23 8. In that Petition, Dr. Chambers indicated that he had completed the requirement
24 detailed above in 2(b).

25 9. However, the IC has reviewed the document that Dr. Chambers submitted with his
26 Petition and that document shows that Dr. Chambers completed a program with PACE on or about
27 December 12, 2022, approximately five (5) months prior to the hearing that was held in this
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² Information about this course is available at <https://www.cpepdoc.org/cpep-courses/probe-ethics-boundaries-program-united-states-2/>.

1 matter (on May 2, 2023, May 3, 2023, June 1, 2023, and June 2, 2023) and just over nine (9)
2 months prior to the Board's consideration of this matter at the Board's September 15, 2023, Board
3 meeting, after which the Board's Order dated October 2, 2023, was entered. As such,
4 Dr. Chambers did not complete the Professional Boundaries Program through PACE as ordered
5 by the Board in this matter. Any program that was completed on or about December 12, 2022,
6 would have been completed without the PACE Program having and utilizing the Board's FFCLO
7 in order to ensure that the Board's findings were addressed in the program.

8 10. Dr. Chambers's Petition was added to the Board's meeting agenda on June 7, 2024,
9 and notice was sent to Dr. Chambers and his counsel on May 6, 2024, via email and certified mail.
10 Neither attended the meeting on June 7, 2024, in order to address the Board regarding
11 Dr. Chambers's Petition.³

12 11. Further, the timeframe that Dr. Chambers was requesting would end in just eight
13 (8) days after the Board meeting.

14 12. On June 15, 2024, and to date, Board staff has received no payments, nor has
15 Board staff received proof of completion of any of the terms ordered by the Board in the FFCLO
16 dated October 2, 2023.

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20 ³ On March 18, 2024, the Board's Deputy Executive Director, Sarah A. Bradley, emailed Dr. Chambers's
21 counsel, Liborious Agwara, Esq., and indicated that the Petition had been received. Ms. Bradley further indicated that
22 the Board just had a meeting on March 1, 2024, with the next meeting scheduled for June 7, 2024, only the Board is
23 able to modify Board orders, and Dr. Chambers was currently not in compliance with the Board's Order as of
24 March 15, 2024. She further stated that she would discuss with the Executive Director and get back to Mr. Agwara
25 on the issue. Subsequently, on April 5, 2024, as a courtesy, the Board's Executive Director instructed Ms. Bradley to
26 inform Dr. Chambers's counsel that he would delay enforcement of the Board's Order until May 15, 2024, with the
27 hope that would allow Dr. Chambers sufficient time to complete the requirements ordered by the Board. On
28 April 5, 2024, the Deputy Executive Director relayed that message to Dr. Chambers's counsel, Mr. Agwara, by email
and Mr. Agwara responded later that day saying, "thanks much for your understanding." On May 6, 2024, the
Board's Executive Director placed Dr. Chambers's Petition to Extend Certain Deadlines on the Board's June 7, 2024,
meeting agenda out of an abundance of caution, given that Board staff had not received any information from
Dr. Chambers regarding his compliance with the Board's Order. This way, the Board could review and decide
Dr. Chambers's request at the June Board meeting. Both Dr. Chambers and Mr. Agwara received notice of the
Petition being placed on the Board's June meeting agenda on May 6, 2024, via email and certified mail. By
May 15, 2024, the Board had received no further information from Dr. Chambers on this issue, nor had Board staff
received any proof of compliance with the requirements ordered by the Board from Dr. Chambers. To date,
Dr. Chambers remains out of compliance with the Board's Order and has engaged in no further communication with
Board staff on this issue.

1 Board the reasonable costs and expenses actually incurred in the investigation and prosecution of
2 this case in the amount of fifty-four thousand two hundred seventeen dollars and thirty-seven
3 cents (\$54,217.37) and/or to make any payments toward these costs and expenses, and (d) pay
4 fines in the amount of one thousand five hundred dollars (\$1,500) for each count found proven,
5 for a total of six thousand dollars (\$6,000) and/or to make any payments toward these assessed
6 fines, and by not responding to communications from Board staff regarding his obligations and/or
7 by not attending the meeting on June 7, 2024 to discuss his Petition to Extend Certain Deadlines
8 with the Board.

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

11 **COUNT II**

12 **NRS 630.254(1) – Failure to Notify the Board Regarding Change of Mailing Address**

13 24. All of the allegations contained in the above paragraphs are hereby incorporated by
14 reference as though fully set forth herein.

15 25. Respondent failed to timely notify the Board of the change in his permanent
16 mailing address within thirty (30) days of the change.

17 26. By reason of the foregoing, Respondent is subject to discipline by the Board as
18 provided in NRS 630.352 and/or NRS 630.254(1).

19 **COUNT III**

20 **NRS 630.3065(2)(c) – Knowing or Willful Failure to Comply with a Provision in NRS**

21 **Chapter 630**

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

24 28. Respondent failed to update both his permanent and mailing addresses on file with
25 the Board as required by NRS 630.254.

26 29. Respondent, as a highly educated person and a holder of a privileged license issued
27 by the Board, knew or should have known that he must update his permanent and mailing
28 addresses with the Board.

1 30. Respondent, as a highly educated person and a holder of a privileged license issued
2 by the Board, knew or should have known that ensuring that the Board has an updated permanent
3 and mailing address for him is essential to the Board’s charge to protect the public.⁴

4 31. Accordingly, Respondent knowingly and/or willfully failed to comply with
5 NRS 630.254, which is grounds for disciplinary action pursuant to NRS 630.3065(2)(c).

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

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

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

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

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

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

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

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⁴ The Board has a duty to protect the public in all of its actions. See NRS 630.003.

OFFICE OF THE GENERAL COUNSEL

Nevada State Board of Medical Examiners

9600 Gateway Drive

Reno, Nevada 89521

(775) 688-2559

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

DATED this 9th day of July, 2024.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:



SARAH A. BRADLEY, J.D., MBA

Deputy Executive Director

9600 Gateway Drive

Reno, NV 89521

Tel: (775) 688-2559

Email: bradleys@medboard.nv.gov

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 9th day of July, 2024.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

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

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CERTIFICATE OF SERVICE

I hereby certify that I am employed by the Nevada State Board of Medical Examiners and that on the 10th day of July, 2024, I served a file-stamped copy of the foregoing Amended Complaint, via USPS Certified Mail, postage pre-paid, to the following parties:

GEORGE PETER CHAMBERS, M.D.
c/o LIBORIUS AGWARA
2785 E. Desert Inn Rd., Ste. 270
Las Vegas, NV 89121
Tracking No.: 9171 9690 0935 0254 6112 40

With courtesy copy by email to:

Liborius Agwara, Esq., at libolaw@yahoo.com

DATED this 10th day of July, 2024.



VALERIE JENKINS
Legal Assistant
Nevada State Board of Medical Examiners