

BEFORE THE BOARD OF MEDICAL EXAMINERS  
OF THE STATE OF NEVADA

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In the Matter of Charges and Complaint

Case No. 25-11896-3

Against:

VINCENT PETER NALBONE, M.D.,

Respondent.

FILED

MAR 21 2025

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS

By: 

COMPLAINT

The Investigative Committee<sup>1</sup> (IC) of the Nevada State Board of Medical Examiners (Board), by and through Ian J. Cumings, Senior Deputy General Counsel and attorney for the IC, having a reasonable basis to believe that Vincent Peter Nalbhone, M.D. (Respondent) violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical Practice Act), hereby issues its Complaint, stating the IC's charges and allegations as follows:

1. Respondent was at all times relative to this Complaint a medical doctor holding an active license to practice medicine in the State of Nevada (License No. 8303). Respondent was originally licensed by the Board on July 11, 1997.

2. Patient A<sup>2</sup> was a ninety-two (92) year-old female at the time of the events at issue.

3. Patient A was referred to Respondent by her doctor on September 25, 2018, following a fall. Respondent documented Patient A presented with complaints of a fractured nose with difficulty breathing, sinus pressure, bleeding and headache.

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<sup>1</sup> The Investigative Committee of the Nevada State Board of Medical Examiners, at the time this formal Complaint was authorized for filing, was composed of Board members Victor M. Muro, M.D., Aury Nagy, M.D. and Ms. Maggie Arias-Petrel.

<sup>2</sup> 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.



12. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when rendering medical services to Patient A by performing an elective surgery despite Patient A's extreme advanced age of ninety-two (92) years old and significant comorbidities.

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

## **COUNT II**

### **NRS 630.3062(1)(a) - Failure to Maintain Complete Medical Records**

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

15. NRS 630.3062(1)(a) provides that the "failure to maintain timely, legible, accurate and complete medical records relating to the diagnosis, treatment and care of a patient" constitute grounds for initiating discipline against a licensee.

16. Respondent failed to maintain complete medical records relating to the diagnosis, treatment and care of Patient A, whose medical records were not timely, legible, accurate, and complete when Respondent failed to: 1) document or note Patient A's prescription medications in any pre-surgical electronic record; 2) document what antibiotics and conservative treatments had been attempted and failed with Patient A prior to the May 29, 2019, surgery; and 3) document the complications suffered by Patient A post-surgery.

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

**WHEREFORE**, the Investigative Committee prays:

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

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

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**Nevada State Board of Medical Examiners**  
**9600 Gateway Drive**  
**Reno, Nevada 89521**  
**(775) 688-2559**

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

DATED this 21<sup>st</sup> day of March, 2025.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

TAN J. CUMINGS,  
Senior Deputy General Counsel  
9600 Gateway Drive  
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*Attorney for the Investigative Committee*

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 21<sup>st</sup> day of March, 2025.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

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