

BEFORE THE BOARD OF MEDICAL EXAMINERS
OF THE STATE OF NEVADA

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In the Matter of Charges and Complaint

Case No. 24-10652-3

Against:

FILED

YARON ZEDEK, M.D.,

FEB 12 2024

Respondent.

NEVADA STATE BOARD OF
MEDICAL EXAMINERS
By: _____

COMPLAINT

The Investigative Committee¹ (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 Yaron Zedek, 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. 7310). Respondent was originally licensed by the Board on December 15, 1994.

2. Patient A² was a sixty-two (62) year-old male at the time of the events at issue.

3. On or about August 18, 2021, Patient A presented to Respondent for an initial psychiatric appointment and medication refill. Patient A was currently taking diazepam.

4. Respondent's evaluation omitted substantial portions of the psychiatric evaluation, including a lack of social history or violence, risk assessment, and an incomplete psychiatric

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¹ 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 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 his privacy but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

1 history including duration and treatment. Additionally, Respondent failed to document a mental
2 status evaluation or provide a diagnosis or treatment plan.

3 5. Respondent documents contradictory information to Patient A's intake sheet,
4 noting that he "is not known to have any medical problems or issues" despite Patient A
5 documenting a clinically relevant history of traumatic brain injury which is associated with
6 psychiatric concerns, including panic disorder.

7 **COUNT I**

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

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

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

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

16 9. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed
17 to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when
18 rendering medical services to Patient A failing to correctly evaluate Patient A in his psychiatric
19 assessment or provide a diagnosis. Respondent failed to include vital portions of the psychiatric
20 assessment in the record, including psychiatric and social history.

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

23 **COUNT II**

24 **NRS 630.3062(1)(a) - Failure to Maintain Proper Medical Records**

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

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

4 13. Respondent failed to maintain complete medical records relating to the diagnosis,
5 treatment and care of Patient A, by failing to correctly document his actions when he treated
6 Patient A, whose medical records were not timely, legible, accurate, and complete. Respondent
7 omitted large portions of the psychiatric evaluation and history in Patient A’s medical record.

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

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

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

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

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

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

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

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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 12th day of February, 2024.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:



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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 12th day of February, 2024.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

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