

COPY

BEFORE THE BOARD OF MEDICAL EXAMINERS
OF THE STATE OF NEVADA

* * * * *

In The Matter of Charges and)
)
Complaint Against)
)
MUZAFFAR KIRMANI, M.D.,)
)
Respondent.)

Case No. 09-10129-1

FILED

JUL 28 2009

NEVADA STATE BOARD OF
MEDICAL EXAMINERS

COMPLAINT

The Investigative Committee of the Nevada State Board of Medical Examiners, composed of Charles N. Held, M.D., Ms. Jean Stoess, M.A., and Benjamin J. Rodriguez, M.D., by and through Edward Cousineau, General Counsel for the Nevada State Board of Medical Examiners, having a reasonable basis to believe that Muzaffar Kiramani, M.D., hereinafter referred to as "Respondent," has violated the provisions of NRS Chapter 630, hereby issues its formal Complaint, stating the Investigative Committee's charges and allegations, as follows:

1. Respondent is licensed in active status to practice medicine in the state of Nevada, and at all times alleged herein, was so licensed by the Nevada State Board of Medical Examiners, pursuant to the provisions of Chapter 630 of the Nevada Revised Statutes.

2. Patient A, whose true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient Designation served on Respondent along with a copy of this Complaint, was evaluated and treated at various times by Respondent between October of 2004 and September of 2005.

3. Many of the associated medical records related to Patient A's evaluation and treatment by Respondent lack adequate documentation and detail to reconstruct the facts of the related care or to illustrate the basis for Respondent's medical decision making and related

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OFFICE OF THE GENERAL COUNSEL
Nevada State Board of Medical Examiners
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1 treatment plans. Specific examples include insufficient documentation surrounding pre-operative
2 and post-operative evaluations of Patient A.

3 4. Section 630.3062(1) of the Nevada Revised Statutes (NRS) provides that failure to
4 maintain timely, legible, accurate and complete medical records relating to the diagnosis,
5 treatment and care of a patient, is grounds for initiating disciplinary action.

6 5. Respondent violated NRS 630.3062(1) when he failed to properly maintain medical
7 records related to Patient A and is subject to discipline by the Nevada State Board of Medical
8 Examiners as provided in NRS 630.352.

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


10 1. That the Nevada State Board of Medical Examiners fix a time and place for a formal
11 hearing;

12 2. That the Nevada State Board of Medical Examiners give Respondent notice of the
13 charges herein against him, the time and place set for the hearing, and the possible sanctions against
14 him;

15 3. That the Board determine what sanctions it deems appropriate to impose for the
16 violation committed by Respondent; and

17 4. That the Board make, issue and serve on Respondent its findings of facts,
18 conclusions of law and order, in writing, that includes the sanctions imposed.

19
20 DATED this 28th day of July, 2009.

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22 By: 
23 Edward Cousineau
24 Attorney for the Investigative Committee of the
25 Nevada State Board of Medical Examiners
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VERIFICATION

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STATE OF NEVADA)
 : SS.
COUNTY OF DOUGLAS)

Charles N. Held, 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 28th day of July, 2009.



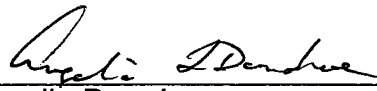
Charles N. Held, M.D.

CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on the 28th day of July 2009, I served a file copy of the COMPLAINT, a copy of the PATIENT DESIGNATION and a original copy of the SETTLEMENT, WAIVER AND CONSENT AGREEMENT along with fingerprinting information by mailing via USPS certified return receipt to the following:

Muzaffar Kirmani, M.D.
601 Rancho Drive, #31-D
Las Vegas, NV 89106

Dated this 28th day of July 2009.



Angelia Donohoe
Legal Assistant

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