

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

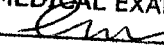
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6 **In the Matter of Charges and** )  
7 **Complaint Against** )  
8 **NAVNEET N. SHARDA, M.D.,** )  
9 **Respondent** )

Case No. 13-11856-1

**FILED**

**MAY 13 2013**

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS  
By: 

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11  
12 **COMPLAINT**

13 The Investigative Committee (IC) of the Nevada State Board of Medical Examiners  
14 (Board), composed at the time of filing of Theodore B. Berndt, M.D., Chairman,  
15 Valerie J. Clark, BSN, RHU, LUTCF, Member, and Michael J. Fischer, M.D., Member, by and  
16 through Erin L. Albright, Esq., Deputy General Counsel and attorney for the IC, having a  
17 reasonable basis to believe that Navneet N. Sharda, M.D. (Respondent), violated the provisions of  
18 Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter  
19 630 (collectively, the Medical Practice Act), hereby issues its formal Complaint, stating the IC's  
20 charges and allegations as follows:

21 1. Respondent is currently licensed in active status (License No. 8200), and has been  
22 so licensed by the Board since June 10, 1997, pursuant to the provisions of the Medical Practice  
23 Act.

24 2. Patient A was a seventy-two (72)-year-old male with a history of prostate cancer  
25 and related complications at the time of the incident in question. His true identity is not disclosed  
26 in this Complaint to protect his identity, but his identity is disclosed in the Patient Designation  
27 served contemporaneously on Respondent with a copy of this Complaint.

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OFFICE OF THE GENERAL COUNSEL

Nevada State Board of Medical Examiners  
1105 Terminal Way #301  
Reno, Nevada 89502  
(775) 688-2559

1           12.     As demonstrated by, but not limited to the above-outlined facts, Respondent failed  
2 to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when  
3 treating Patient A.

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

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

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

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


12          3.     That the Board determine the sanctions it will impose if it finds Respondent  
13 violated the Medical Practice Act;

14          4.     That the Board make, issue and serve on Respondent, in writing, its findings of  
15 fact, conclusions of law and order, which shall include the sanctions imposed; and

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

18           DATED this 10<sup>th</sup> day of May, 2013.

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

22           By:   
23                           Erin L. Albright, Esq.  
24                           Deputy General Counsel  
25                           Attorney for the Investigative Committee  
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VERIFICATION

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STATE OF NEVADA        )  
                                  : ss.  
COUNTY OF WASHOE    )

Theodore B. Berndt, M.D., hereby deposes and states under penalty of perjury under the laws of the state of Nevada that he is the Chairman of the Investigative Committee of the Nevada State Board of Medical Examiners that authorized the foregoing Complaint against the Respondent herein; that he has read the foregoing Complaint; and that based upon information discovered during the course of the investigation into a complaint against Respondent, he believes the allegations and charges in the foregoing Complaint against Respondent are true, accurate and correct.

Dated this 10<sup>th</sup> day of MAY, 2013.

Theodore B. Berndt  
Theodore B. Berndt, M.D.

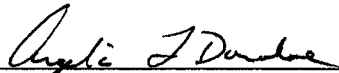
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**CERTIFICATE OF MAILING**

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 13<sup>th</sup> day of May 2013; I served a filed copy of the COMPLAINT, PATIENT DESIGNATION & FINGERPRINT INFORMATION, via USPS certified return receipt mail to the following:

Navneet Sharda, M.D.  
3509 E. Harmon Ave.  
Las Vegas, NV 89121

Dated this 13<sup>th</sup> day of May, 2013.

  
\_\_\_\_\_  
Angelia L. Donohoe  
Legal Assistant