

BEFORE THE BOARD OF MEDICAL EXAMINERS  
OF THE STATE OF NEVADA

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In The Matter of Charges and

Complaint Against

FARRUKH IMTIAZ, M.D.,

Respondent.

Case No. 08-19156-1

NO. \_\_\_\_\_

FILED 28 MAY 2008

Alan A. Clark  
EXECUTIVE DIRECTOR

COMPLAINT

The Investigative Committee of the Board of Medical Examiners of the state of Nevada, composed of Charles N. Held, M.D., Chairman, Cindy Lamerson, M.D. Member, and Jean Stoess, M.A., Member, by and through Lyn E. Beggs, Deputy General Counsel for the Nevada State Board of Medical Examiners, having a reasonable basis to believe that Farrukh Imtiaz, 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 currently licensed in active status, and was so licensed by the Nevada State Board of Medical Examiners, hereinafter referred to as "the Board," pursuant to the provisions of Chapter 630 of the Nevada Revised Statutes, at the time of the incidents in question.

2. Patient A was a forty-five year old female at the time of the matter in question. Her true identity is not disclosed to protect her privacy, but her identity is disclosed in the Patient Designation served on Respondent along with a copy of this Complaint.

3. Patient A presented to the emergency room of Sunrise Hospital on the morning of July 21, 2001 with complaints of right flank pain which began the prior evening.

4. Patient A was an insulin dependant diabetic with a history of a long-standing obstruction of the right uteropelvic junction for which surgery had been scheduled.

5. Patient A was seen by a physician in the emergency room who ordered multiple tests and diagnostic studies.

1           6.     After testing and diagnostic studies had been performed, the emergency room physician  
2 admitted Patient A to the hospital and wrote holding orders at 13:45 for the admitting internist, the  
3 Respondent. These orders were good for twelve hours.

4           7.     Patient A was transferred to the medical floor at 18:15.

5           8.     Patient A developed severe right sided pain at 21:40. Medication was provided and the  
6 nursing staff contacted Respondent by phone.

7           9.     Respondent phoned in orders for Patient A at approximately 22:40.

8           10.    Patient A's condition worsened and Respondent was again contacted by phone by the  
9 nursing staff sometime after 01:30 on July 22, 2001 to advise him of Patient A's condition.

10          11.    Respondent again phoned in orders for Patient A at 02:00.

11          12.    Patient A's condition continued to worsen and nursing staff noted dyspnea and dilated  
12 pupils and again contacted Respondent at approximately 02:20.

13          13.    Respondent phoned in orders at approximately 02:40 which included a transfer to the  
14 intensive care unit (ICU).

15          14.    At approximately 03:30, Respondent gave additional orders by telephone which included  
16 a request for intubation and a cardiac consult.

17          15.    Additional orders were made at approximately 05:30 by the physician who performed the  
18 cardiac consult.

19          16.    Respondent personally saw Patient A for the first time at approximately 06:45 and  
20 dictated a history and physical at 07:22 noting impressions of combined causation of metabolic acidosis,  
21 shock, a presumptive acute upper gastrointestinal bleed and disseminated intravascular coagulation.

22          17.    Over the next two days, Patient A received treatment from multiple practitioners in an  
23 effort to save her life, however, on July 24, 2001, she suffered cardiopulmonary arrest at 04:05 and  
24 expired.

25          18.    Respondent's failure to see Patient A within twelve hours of her admission was a  
26 violation of the General Rules and Regulations of Sunrise Hospital.

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Count I

19. Nevada Administrative Code Section 630.040 defines malpractice as the failure of a physician, in treating a patient, to use the reasonable care, skill, or knowledge ordinarily used under similar circumstances.

20. Nevada Revised Statute Section 630.301(4) provides that malpractice is grounds for initiating disciplinary action against a licensee.

21. Respondent failed to use the reasonable care, skill, or knowledge ordinarily used under similar circumstances when he failed to see Patient A upon being notified of the deterioration of her condition and his failure to see her within twelve hours of her admission as mandated by Sunrise Hospital.

22. By reason of the foregoing, Respondent is subject to discipline by the Nevada State Board of Medical Examiners as provided in Section 630.352 of the Nevada Revised Statutes.

**WHEREFORE**, the Investigative Committee prays:

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

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

3. That the Nevada State Board of Medical Examiners determine what sanctions it will impose for the violation or violations committed by Respondent;

4. That the Nevada State Board of Medical Examiners make, issue and serve on Respondent its findings of facts, conclusions of law and order, in writing, that includes the sanctions imposed; and

5. That the Nevada State Board of Medical Examiners take such other and further action as may be just and proper in these premises.

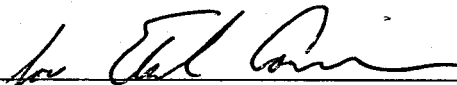
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1 DATED this 20<sup>th</sup> day of May, 2008.

2 INVESTIGATIVE COMMITTEE OF  
3 THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

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5 By:   
6 Lyn E. Beggs  
7 Attorney for the Investigative Committee of the Nevada  
8 State Board of Medical Examiners

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1 **VERIFICATION**

2 STATE OF NEVADA )  
3 : ss.  
4 COUNTY OF DOUGLAS )

5 CHARLES N. HELD, M.D., having been duly sworn, hereby deposes and states under penalty  
6 of perjury that he is the Chairman of the Investigative Committee of the Nevada State Board of Medical  
7 Examiners that authorized the complaint against the Respondent herein; that he has read the foregoing  
8 Complaint; and that based upon information discovered in the course of the investigation into a  
9 complaint against Respondent, he believes that the allegations and charges in the foregoing Complaint  
10 against Respondent are true, accurate, and correct.

11 DATED this 28<sup>th</sup> day of May, 2008.

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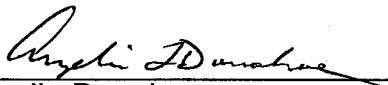
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15 CHARLES N. HELD, M.D.  
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1 **CERTIFICATE OF MAILING**

2 I hereby certify that I am employed by Nevada State Board of Medical Examiners and  
3 that on the 28<sup>th</sup> day of May 2008, I served a file copy of the COMPLAINT, NOTICE OF PRE-  
4 HEARING CONFERENCE & HEARING, a copy of PATIENT DESIGNATION, along with a  
5 copy of the appointment letter, by mailing via USPS certified return receipt to the following:

6 Farrukh Imtiaz, M.D.  
7 4445 S. Eastern Ave., Ste. B  
8 Las Vegas, NV 89119-7851

9 Dated this 28<sup>th</sup> day of May 2008.

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13 Angelia Donohoe  
14 Legal Assistant  
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