

COPY For Public

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

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In The Matter of Charges and
Complaint Against
MANI NAMBIAR, M.D.,
Respondent.

NO. Case No. 07-7759-1

FILED 22 January 2008


EXECUTIVE DIRECTOR

COMPLAINT

The Investigative Committee of the Board of Medical Examiners of the state of Nevada, composed of Charles Held, M.D., Chairman, Cindy Lamerson, M.D., Member, and Jean Stoess, M.A., Member, by and through Edward O. Cousineau, Deputy General Counsel for the Nevada State Board of Medical Examiners, having a reasonable basis to believe that Mani Nambiar, 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. Respondent was granted a license to practice medicine in the state of California on July 1, 1983. On December 11, 2003, the state of California filed a four-count Accusation against Respondent alleging among other things, gross negligence on the part of Respondent, in his care and treatment of multiple patients.

3. Thereafter, on February 9, 2005, the state of California entered an Order revoking Respondent's license to practice medicine, however, that revocation was stayed, and Respondent was placed on probation with various conditions for a period of five years beginning March 11, 2005.

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1 4. Section 630.301(3) of the Nevada Revised Statutes provides that the suspension,
2 modification or limitation of the license to practice any type of medicine by any other jurisdiction is
3 grounds for disciplinary action.

4 5. The stayed revocation of Respondent's license to practice medicine in the state of
5 California, constitute violations of the provisions of NRS 630.301(3).

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

8 WHEREFORE, the Investigative Committee prays:

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

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


14 3. That the Nevada State Board of Medical Examiners determine what sanctions it
15 determines to impose for the violation or violations committed by Respondent; and

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

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

21 DATED this 22nd day of January, 2008.

22 INVESTIGATIVE COMMITTEE OF
23 THE NEVADA STATE BOARD OF MEDICAL EXAMINERS


24 By: 
25 Edward O. Cousineau
26 Attorney for the Investigative Committee of the
27 Nevada State Board of Medical Examiners
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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 24th day of January 2008, I served a file copy of the COMPLAINT, NOTICE OF
4 PRE-HEARING CONFERENCE & HEARING and SETTLEMENT, WAIVER & CONSENT
5 AGREEMENT, along with appointment letter, by mailing via Federal Express mail to the
6 following:

7 Mani Nambiar, M.D.
8 130 South Buena Vista St.
9 Hemet, CA 92543

10 Dated this 24th day of January 2008.

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12 _____
13 Angelia Donohoe
14 Legal Assistant
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