

BEFORE THE BOARD OF MEDICAL EXAMINERS
OF THE STATE OF NEVADA

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In The Matter of Charges and)
Complaint Against)
THOMAS SAZANI, M.D.)
Respondent.)

Case No. 10-9841-1
FILED

AUG - 6 2010

NEVADA STATE BOARD OF
MEDICAL EXAMINERS
By: [Signature]

COMPLAINT

The Investigative Committee of the Nevada State Board of Medical Examiners, composed at the time filing was approved of Charles N. Held, M.D., Theodore B. Berndt, M.D. and Ms. Valerie Clark, BSN, RHU, LUTCF, having a reasonable basis to believe that Thomas Sazani, M.D., hereinafter referred to as Dr. Sazani, has violated the provisions of NRS Chapter 630, hereby issues its formal Complaint, stating the Investigative Committee's charges and allegations, as follows:

1. Dr. Sazani is currently licensed in active status (License No. 5890), and was originally licensed on July 1, 1989 by the Nevada State Board of Medical Examiners pursuant to the provisions of Chapter 630 of the Nevada Revised Statutes.

2. Dr. Sazani currently holds a license to practice medicine in the state of California and was so licensed on December 16, 1995.

3. On June 1, 2009, the Medical Board of California served an Accusation on Dr. Sazani alleging three counts of violations of the California Business and Professions Code, related to the prescribing of a medication over the internet without performing any physical examination of the patient.

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1 4. Dr. Sazani, with the advice of counsel, entered into a settlement agreement with the
2 Medical Board of California in November 2009. The Stipulated Settlement and Disciplinary
3 Order revoked Dr. Sazani's medical license in California, with the revocation being stayed and
4 Dr. Sazani being placed on three years probation, subject to various terms and conditions.

5 5. On January 13, 2010, the Medical Board of California issued its Decision adopting
6 the Stipulated Settlement and Disciplinary Order which became effective on February 11, 2010.

7 6. Dr. Sazani notified the Nevada State Board of Medical Examiners in a timely
8 fashion of the disciplinary action taken by the Medical Board of California.

9 **Count I**

10 7. NRS 630.301(3) provides that any disciplinary action, including the revocation,
11 suspension, modification or limitation of a license to practice any type of medicine taken by
12 another state is grounds for initiating disciplinary action against a licensee.

13 8. Dr. Sazani was disciplined by the Medical Board of California as described above
14 and accordingly, Dr. Sazani is in violation of NRS 630.301(3).

15 9. By reason of the foregoing, Dr. Sazani is subject to discipline by the Nevada State
16 Board of Medical Examiners as provided in NRS 630.352.

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

18 1. That the Nevada State Board of Medical Examiners give Dr. Sazani notice of the
19 charges herein against him and give him notice that he may file an answer to the Complaint herein
20 as set forth in Section 630.339 of the Nevada Revised Statutes within twenty (20) days of service
21 of the Complaint.

22 2. That the Nevada State Board of Medical Examiners set a time and place for a
23 formal hearing after holding an Early Case Conference pursuant to NRS 630.339(3);

24 3. That the Nevada State Board of Medical Examiners determine what sanctions it
25 determines to impose if it determines there has been a violation or violations of the Medical
26 Practice Act (Nevada Revised Statutes Chapter 630) committed by Dr. Sazani; and

27 4. That the Nevada State Board of Medical Examiners make, issue and serve on

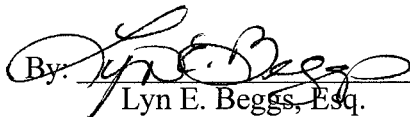
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1 Dr. Sazani its findings of facts, conclusions of law and order, in writing, that includes the
2 sanctions imposed; and

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

5 DATED this 10th day of August, 2010.

6 THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

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8 By: 
9 Lyn E. Beggs, Esq.
10 General Counsel and Attorney for the Investigative Committee

11 VERIFICATION

12 STATE OF NEVADA)
13 : ss.
14 COUNTY OF DOUGLAS)

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

21 DATED this 6th day of August, 2010.

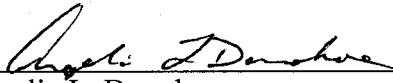
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23 
24 CHARLES N. HELD, M.D.

CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 6th day of August 2010; I served a file copy of the Complaint and the Fingerprint Information by mailing via USPS certified return receipt mail to the following:

Thomas Sazani, M.D.
PO Box 2867
Orcutt, CA 93457

Dated this 6th day of August 2010.



Angelia L. Donohoe
Legal Assistant