

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

3 * * * * *

4
5 **In The Matter of Charges and**) **Case No. 11-29836-1**
6 **Complaint Against**)
7 **NAUMAN JAHANGIR, M.D.**)
8 **Respondent.**)

FILED

SEP 16 2011

9
10 **NEVADA STATE BOARD OF**
MEDICAL EXAMINERS
By: _____

11 **COMPLAINT**

12 The Investigative Committee of the Nevada State Board of Medical Examiners, composed
13 at the time filing was approved of Benjamin J. Rodriguez, M.D., Beverly Neyland, M.D. and
14 Ms. Donna Ruthe, having a reasonable basis to believe that Nauman Jahangir, M.D. hereinafter
15 referred to as Dr. Jahangir, has violated the provisions of NRS Chapter 630, hereby issues its
16 formal Complaint, stating the Investigative Committee's charges and allegations, as follows:

17 1. Dr. Jahangir is licensed to practice medicine in the state of Nevada (License No.
18 11295), and was originally licensed on January 11, 2005 by the Nevada State Board of Medical
19 Examiners pursuant to the provisions of Chapter 630 of the Nevada Revised Statutes.

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

23 3. Patient A presented to Dr. Jahangir in early February 2007 for management of her
24 varicose veins. Patient A had undergone vein stripping in the past and did not wish surgical
25 intervention but rather opted to undergo injection of sclerosant for treatment of her varicose veins.

26 4. On February 13, 2007, Dr. Jahangir performed bilateral injection of sclerosant on
27 Patient A at Sunrise Hospital under local anesthesia. According to the procedure note, the sites of
28 varicosities had been marked and after infiltration of a quarter percent bupivacaine with

1 epinephrine, 98% alcohol was injected at all sites around the veins, but not any direct intravenous
2 administration of the veins occurred.

3 5. At Patient A's post-procedure visit to Dr. Jahangir, she was noted to have necrotic
4 skin over the injection sites and pain at her right ankle. She was provided with oral antibiotics as
5 well as antibiotic ointment.

6 6. Patient A continued to have some wound problems requiring follow-up treatment
7 by Sunrise Comprehensive Wound Care.

8 **Count I**

9 7. NAC 630.040 defines malpractice as the failure of a physician, in treating a patient,
10 to use the reasonable care, skill, or knowledge ordinarily used under similar circumstances.

11 8. NRS 630.301(4) provides that malpractice is grounds for initiating discipline
12 against a licensee.

13 9. Dr. Jahangir committed malpractice as defined by NAC 630.040 when he used
14 98% alcohol as the sclerosing agent and injected in the tissue surrounding Patient A's varicose
15 veins rather than injecting the veins and accordingly is in violation of NRS 630.301(4).

16 10. By reason of the foregoing, Dr. Jahangir is subject to discipline by the Nevada State
17 Board of Medical Examiners as provided in NAC 630.555.

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

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

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

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


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

1 Dr. Jahangir 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 16th day of September, 2011.

6
7 THE INVESTIGATIVE COMMITTEE OF
8 THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

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

12
13 VERIFICATION

14 STATE OF NEVADA)
15) : ss.
16 COUNTY OF CLARK)

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

23 DATED this 16th day of September, 2011.

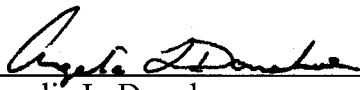
24
25 
26 BENJAMIN J. RODRIGUEZ, M.D.
27
28

CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 16th day of September 2011, I served a file copy of the COMPLAINT, PATIENT DESIGNATION, SETTLEMENT, WAIVER & CONSENT AGREEMENT & Fingerprint information via USPS e-certified mail to the following:

Nauman Jahangir, M.D.
4160 S. Pecos Rd., Ste. 10
Las Vegas, NV 89121

Dated this 16th day of September 2011.



Angelia L. Donohoe
Legal Assistant