

1 14. NRS 630.305(1)(d) provides that the charging for visits to the physician's office
2 which did not occur or for services which were not rendered is grounds for initiating discipline
3 against a licensee.

4 15. As demonstrated by, but not limited to, the above-outlined facts, the patient billing
5 records reviewed by OIG during its investigation demonstrate that Respondent charged for visits
6 to his office that did not occur and/or charged for services that were not rendered.

7 16. By reason of the foregoing, Respondent is subject to discipline by the Board as
8 provided in NRS 630.352.

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

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

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

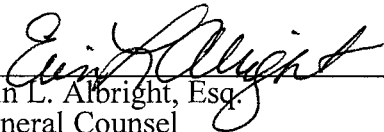
15 3. That the Board determine the sanctions it will impose if it finds Respondent
16 violated the Medical Practice Act;

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

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

21 DATED this 18th day of July, 2013.

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

25 By: 
26 Erin L. Albright, Esq.
27 General Counsel
28 Attorney for the Investigative Committee

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


VERIFICATION

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STATE OF NEVADA)
 : ss.
COUNTY OF CLARK)

Benjamin J. Rodriguez, 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 18th day of July, 2013.



Benjamin J. Rodriguez, M.D.

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


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CERTIFICATE OF SERVICE

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 22nd day of July 2013; I served a filed copy of the COMPLAINT and Settlement Letter, via USPS e-certified mail to the following:

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

Dated this 22nd day of July, 2013.



Angelia L. Donohoe
Legal Assistant