

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

3 * * * * *

4
5 **In the Matter of Charges and**
6 **Complaint Against**
7 **DHIRAJ RAJ JEYANANDARAJAN, M.D.,**
8 **Respondent.**

Case No. 18-39711-1

FILED

MAY 14 2018

NEVADA STATE BOARD OF
MEDICAL EXAMINERS
By: 

9
10 **COMPLAINT**

11 The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners,
12 hereby issues this formal Complaint against Dhiraj Raj Jeyanandarajan, M.D. (hereinafter referred
13 to as Respondent), a licensed physician in Nevada. After investigating this matter, the IC has a
14 reasonable basis to believe that Respondent has violated provisions of Nevada Revised Statutes
15 (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the
16 Medical Practice Act).

17 The IC alleges the following facts:

18 1. Respondent is currently licensed in active status (License No. 14512). Respondent
19 was issued his license from the Nevada State Board of Medical Examiners on August 16, 2012,
20 pursuant to the provisions of NRS Chapter 630.

21 2. On or about September 6, 2017, the State Board of Medicine of the Commonwealth
22 of Pennsylvania entered into a Consent Agreement and Order with Respondent, whereby
23 Respondent was disciplined for failing to comply with continuing education requirements to
24 renew his medical license in Pennsylvania; Respondent was 31.0 hours short of the minimum one
25 hundred (100) total hours of continuing medical education required for renewal of his license.

26 3. Respondent did not timely report the September 6, 2017 Consent Agreement and
27 Order to the Nevada State Board of Medical Examiners.

28

¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time the filing of this
Complaint was approved, was composed of Wayne Hardwick, M.D., Mr. M. Neil Duxbury, and Aury Nagy, M.D.

OFFICE OF THE GENERAL COUNSEL
Nevada State Board of Medical Examiners
9600 Gateway Drive
Reno, Nevada 89521
(775) 688-2559

Count I

(NRS 630.301(3))

1
2
3 4. All of the allegations contained in the above paragraphs are hereby incorporated by
4 reference as though fully set forth herein.

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

8 6. On or about September 6, 2017, the State Board of Medicine of the Commonwealth
9 of Pennsylvania entered into a Consent Agreement and Order with Respondent for his failure to
10 comply with the Pennsylvania continuing medical education requirements.

11 7. The September 6, 2017 Consent Agreement and Order was a disciplinary action taken
12 by another state.

13 8. By reason of the foregoing, Respondent is subject to discipline by the Nevada State
14 Board of Medical Examiners as provided in NRS 630.352.

Count II

(NRS 630.306(1)(k))

15
16
17 9. All of the allegations contained in the above paragraphs are hereby incorporated by
18 reference as though fully set forth herein.

19 10. NRS 630.306(1)(k) provides that failure by a licensee or applicant to report in
20 writing, within 30 days, any disciplinary action taken against the licensee or applicant by another
21 state, the Federal Government or a foreign country, including, without limitation, the revocation,
22 suspension or surrender of a license to practice medicine in another jurisdiction, is grounds for
23 initiating disciplinary action.

24 11. Respondent was disciplined by the State Board of Medicine of the Commonwealth
25 of Pennsylvania as described above.

26 12. Respondent failed to timely report the disciplinary action taken by the State Board of
27 Medicine of the Commonwealth of Pennsylvania.

28 13. Accordingly, Respondent has violated NRS 630.306(1)(k).

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

14. By reason of the foregoing, Respondent is subject to discipline by the Nevada State Board of Medical Examiners as provided in NRS 630.352.

WHEREFORE, the Investigative Committee prays:

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

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

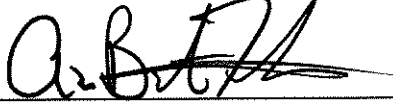
3. That the Nevada State Board of Medical Examiners determine what sanctions to impose if it determines there has been a violation or violations of the Medical Practice Act committed by Respondent;

4. That the Nevada State Board of Medical Examiners make, issue and serve on Respondent its findings of fact, 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.

DATED this 14 day of May, 2018.

INVESTIGATIVE COMMITTEE OF
THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 
Robert Kilroy, Esq., General Counsel
Aaron Bart Fricke, Esq., Deputy General Counsel
Attorneys for the Investigative Committee

VERIFICATION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

STATE OF NEVADA)
 : ss.
COUNTY OF WASHOE)

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

DATED this 14th day of May, 2018.



Wayne Hardwick, M.D.