(775) 688-2559

### BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

\* \* \* \*

In the Matter of Charges and

**Complaint Against** 

IRFAN M. MIRZA, M.D.,

Respondent.

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Case No. 18-12909-1

FILED

AUG 2 4 2018

NEVADA STATE BOARD OF

### **COMPLAINT**

The Investigative Committee<sup>1</sup> (IC) of the Nevada State Board of Medical Examiners ("Board") hereby issues this formal Complaint against Irfan M. Mirza, M.D. (hereinafter referred to as Respondent), a licensed physician in Nevada. After investigating this matter, the IC has a reasonable basis to believe that Respondent has violated provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical Practice Act).

The IC alleges the following facts:

- 1. Respondent is currently licensed in active status (License No. 9290). Respondent was issued his license from the Board on January 28, 2000, pursuant to the provisions of NRS Chapter 630.
- 2. On or about September 16, 2016, the Arizona Medical Board issued an Order for Letter of Reprimand and Probation; and Consent to the Same to Respondent.
- The Arizona Medical Board's Order contains facts that Respondent's treatment of two 3. patients regarding pacemaker implantations failed to meet the standard of care.
- Pursuant to the Order for Letter of Reprimand and Probation; and Consent to the Same, the 4. Arizona Medical Board disciplined Respondent in the following manner: (1) Respondent was issued a Letter of Reprimand; (2) Respondent was placed on probation for a period of 6 months with the following terms and conditions: (a) six (6) hours of Continuing Medical Education (CME) regarding EKG

<sup>&</sup>lt;sup>1</sup> 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., Theodore B. Berndt, M.D., and Mr. M. Neil Duxbury.

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Interpretation within six (6) months of the Order; (b) obey all laws; (c) tolling of probation if Respondent is not practicing medicine in Arizona for a period of time exceeding thirty days.

### Count I

### NRS 630.301(3)

### (Disciplinary Action by Another Licensing Board)

- All of the allegations contained in the above paragraphs are hereby incorporated by 5. reference as though fully set forth herein.
- 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 another state, constitute grounds for initiating disciplinary action against a licensee.
- On or about September 16, 2016, the Arizona Medical Board issued an Order for Letter of 7. Reprimand and Probation; and Consent to the Same to Respondent.
- The Order for Letter of Reprimand and Probation; and Consent to the Same was a 8. disciplinary action taken by another state.
- By reason of the foregoing, Respondent is subject to discipline by the Nevada State Board 9. of Medical Examiners as provided in NRS 630.352.

### WHEREFORE, the Investigative Committee prays:

- That the Nevada State Board of Medical Examiners give Respondent notice of the charges 1. 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;
- That the Nevada State Board of Medical Examiners set a time and place for a formal 2. hearing after holding an Early Case Conference pursuant to NRS 630.339(3);
- That the Nevada State Board of Medical Examiners determine what sanctions to impose if 3. it determines there has been a violation or violations of the Medical Practice Act committed by Respondent;
- That the Nevada State Board of Medical Examiners make, issue and serve on 4. Respondent its findings of fact, conclusions of law and order, in writing, that includes the sanctions imposed; and

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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 \_\_\_\_\_\_ day of August, 2018.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

Attorneys for the Investigative Committee

### OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners

### VERIFICATION

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 24th day of August, 2018.

Maye Hardwick, M.D.

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### **CERTIFICATE OF MAILING**

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 24<sup>th</sup> day of August 2018; I served a file copy of COMPLAINT and Fingerprint information, via USPS e-certified return receipt mail to the following:

Irfan M. Mirza, M.D. 5861 Highway 95, Ste A Fort Mohave, AZ 86427

Dated this 24th day of August, 2018

Dawn DeHaven Gordillo
Legal Assistant