OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners

9600 Gateway Drive Reno, Nevada 89521 (775) 688-2559

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * * *

In the Matter of Charges and) Case No. 19-46237-1
Complaint Against)) FILED
PRIYA CHIB, M.D.,)) JUL 1 2 2019
Respondent.	NEVADA STATE BOARD OF MEDICAD EXAMINERS By:

COMPLAINT

The Investigative Committee (IC)¹ of the Nevada State Board of Medical Examiners (Board), by and through Robert G. Kilroy, Esq., General Counsel and attorney for the IC, having a reasonable basis to believe that Priya Chib, M.D. (Respondent), has violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical Practice Act), hereby issues its formal Complaint, stating the IC's charges and allegations as follows:

- 1. Respondent was at all times relative to this Complaint a medical doctor holding an active license to practice medicine in the State of Nevada (License No. 16818). Respondent was originally licensed by the Board on November 29, 2016.
- 2. On November 30, 2018, the California Medical Board and Respondent entered into a Decision/Stipulated Settlement and Disciplinary Order (Decision). Effective date for this Decision was December 28, 2018; Respondent received the following discipline: a public reprimand, shall complete 20 hours of an educational course aimed at correcting areas of deficient practice of knowledge, and shall enroll in a medical record keeping course.

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

Nevada State Board of Medical Examiners

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COUNT I

NRS 630.301(3)

(Out-of-State Discipline Imposed)

- All of the allegations in the above paragraphs are hereby incorporated as if fully set 3. forth herein.
- NRS 630.301(3) provides that any disciplinary action, including, without 4. limitation, the revocation, suspension, modification or limitation of a license to practice any type of medicine, taken by another state, the Federal Government, a foreign country or any other jurisdiction or the surrender of the license or discontinuing the practice of medicine while under investigation by any licensing authority, a medical facility, a branch of the Armed Services of the United States, an insurance company, an agency of the Federal Government or an employer, is grounds for initiating discipline against a licensee.
- By reason of the foregoing, Respondent is subject to discipline by the Board as 5. provided in NRS 630.352.

WHEREFORE, the IC prays:

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

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OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners 9600 Gateway Drive Reno, Nevada 89521

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

DATED this 28 day of June 2019.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

Robert G. Kilroy, Esq., General Counsel Attorney for the Investigative Committee

OFFICE OF THE GENERAL COUNSEL

Vevada State Board of Medical Examiners

VERIFICATION

STATE OF NEVADA		
	:	SS
COUNTY OF WASHOE)	

Wayne Hardwick, 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 12th day of July, 2019.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

Wayne Hardwick, M.D., Chairman

Marge Hardwick

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners 9600 Gateway Drive

CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on the 17th day of July, 2019, I served a filed copy of the formal COMPLAINT, via USPS e-certified, return receipt mail to the following:

Priya Chib, M.D. 10105 Banburry Cross Drive Las Vegas, NV 89144

Dated this $17^{1/1}$ day of July, 2019.

Shori L. Quigley, Legal Assistant