(775) 688-2559

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

\* \* \* \* \*

In the Matter of Charges and

**Complaint Against** 

MANISH J. PATEL, M.D.,

Respondent.

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Case No. 20-46475-1

FILED

MAY - 6 2020

NEVADA STATE BOARD OF MEDICAL EXAMINERS

## **COMPLAINT**

The Investigative Committee<sup>1</sup> (IC) of the Nevada State Board of Medical Examiners (Board), by and through Aaron Bart Fricke, Esq., Senior Deputy General Counsel and attorney for the IC, having a reasonable basis to believe that Manish J. Patel, M.D. (Respondent) 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 Complaint, stating the IC's charges and allegations as follows:

- 1. Respondent was at all times relevant to this Complaint, a physician licensed to practice medicine in the State of Nevada (License No. 16992). His license was originally issued by the Board on March 3, 2017.
- 2. Pursuant to an Order for Decree of Censure and Probation; and Consent to the Same (Order), filed in Case No. MD-19-0321A on March 6, 2020, the Arizona Medical Board found that Respondent violated Arizona Revised Statutes (ARS) § 32-1401(27)(s) ("Violating a formal order, probation, consent agreement or stipulation issued or entered into by the [Arizona] board or its executive director under the provisions of this chapter"), and ordered that the Respondent be censured and placed on probation for five years, among other orders.

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<sup>1</sup> The Investigative Committee (IC) of the Nevada State Board of Medical Examiners (Board), at the time this formal Complaint was authorized for filing, was composed of Board members Mr. M. Neil Duxbury, Chairman, Aury Nagy, M.D., and Michael C. Edwards, M.D., FACS.

## **COUNT I**

## NRS 630.301(3) (Disciplinary Action by Another State Medical Board)

- 3. All of the allegations in the above paragraphs are hereby incorporated as if fully set forth herein.
- 4. Pursuant to NRS 630.301(3), any disciplinary action, including, without limitation, the revocation, suspension, modification or limitation of a license to practice any type of medicine, taken by another state, among other entities, is grounds for disciplinary action against a licensee.
- 5. The Arizona Medical Board's Order of March 6, 2020, constitutes disciplinary action by another state.
- 6. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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

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## WHEREFORE, the Investigative Committee prays:

- 1. That the Board give Respondent notice of the charges herein and give notice that an answer to the Complaint herein may be filed as set forth in NRS 630.339(2) within twenty (20) days of service of the Complaint;
- 2. That the Board set a time and place for a formal hearing after holding an Early Case Conference pursuant to NRS 630.339(3);
- 3. That the Board 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 Board 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 Board take such other and further action as may be just and proper in these premises.

DATED this \_\_\_\_\_ day of May, 2020.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

Aaron Bart Fricke, Esq., Senior Deputy General Counsel Attorney for the Investigative Committee

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

Nevada State Board of Medical Examiners

Nevada State Board of Medical Examiners

9600 Gateway Drive

8eno, Nevada 89521

(775) 688-2550

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## **VERIFICATION**

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STATE OF NEVADA	)
	: ss.
COUNTY OF WASHOE	)

Mr. M. Neil Duxbury, 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 6th day of May, 2020.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

W. NEIL

M. Neil Duxbury, Chairman

## **CERTIFICATE OF MAILING**

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 6th day of May, 2020; I mailed via USPS e-certified return receipt mail a file-stamped copy of the following: <u>COMPLAINT</u>

Manish Patel, M.D. 9289 N Morning Glory Rd Paradise Valley, AZ 85253

Dated this 6th day of May, 2020.

Dawn Delkusen Sordillo Dawn DeHaven Gordillo Legal Assistant