

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

3 * * * * *

4
5 **In the Matter of Charges and Complaint**

Case No. 19-38390-01

6 **Against**

FILED

7 **ASHER SHAHZAD, M.D.,**

NOV 16 2020

8 **Respondent.**

**NEVADA STATE BOARD OF
MEDICAL EXAMINERS**
By: 

9
10 **FIRST AMENDED COMPLAINT**

11 The Investigative Committee (IC)¹ of the Nevada State Board of Medical Examiners
12 (Board), by and through Aaron Bart Fricke, Esq., Senior Deputy General Counsel and attorney for
13 the IC, having a reasonable basis to believe that Asher Shahzad, M.D. (Respondent), violated the
14 provisions of Nevada Revised Statutes (NRS) Chapter 630 and the Nevada Administrative Code
15 (NAC) Chapter 630 (collectively Medical Practice Act), hereby issues its First Amended Complaint
16 (Complaint), stating the IC's charges and allegations as follows:

17 1. Respondent was at all times relative to this Complaint a licensed medical doctor
18 holding an active license to practice medicine in the State of Nevada (License No. 13790).
19 Respondent was originally licensed by the Board on January 5, 2011.

20 2. Patient A was a 25-year-old female at the time of the incidents in question. Her
21 name is not disclosed in this Complaint to protect her identity, but her identity is disclosed in the
22 Patient Designation contemporaneously served on Respondent with a copy of this Complaint.

23 3. Patient A gave birth to premature twins on or about May 11, 2013.

24 4. Following discharge from the hospital, on or about May 18, 2013, Patient A
25 presented to the emergency department with a fever of 101 degrees Fahrenheit.

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27 ¹The Investigative Committee of the Nevada State Board of Medical Examiners, at the time this formal
28 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.

1 13. By reason of the foregoing, Respondent is subject to discipline by the Board as
2 provided in NRS 630.352.

3 WHEREFORE, the IC prays:

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

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


9 3. That the Board determine what sanctions to impose if it finds and concludes that
10 there has been a violation or violations of the Medical Practice Act committed by Respondent;

11 4. That the Board make, issue and serve on Respondent its findings of fact,
12 conclusions of law and order, in writing, to include sanctions to be imposed; and

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

15 Dated this 16 day of November, 2020.

16 INVESTIGATIVE COMMITTEE OF THE
17 NEVADA STATE BOARD OF MEDICAL EXAMINERS

18 By: 
19 Aaron Bart Fricke, Esq., Senior Deputy General Counsel
20 Attorney for the Investigative Committee
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VERIFICATION

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 16 day of November, 2020.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS


By: M. Neil Duxbury
M. Neil Duxbury, Chairman

CERTIFICATE OF SERVICE

I hereby certify that I am employed by the Nevada State Board of Medical Examiners and that on the 16th day of November, 2020, I served a file-stamped copy of the foregoing **FIRST AMENDED COMPLAINT**, via U.S. Certified Mail to the following parties:

Asher Shahzad, M.D.
c/o Thomas J. Doyle
SCHUERING ZIMMERMAN & DOYLE
400 University Avenue
Sacramento, CA 95825
**Certified Mail Receipt No.:*

DATED this 16th day of November, 2020.


Mercedes Fuentes, Legal Assistant
Nevada State Board of Medical Examiners