

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

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

* * * * *

In the Matter of Charges and Complaint

Case No. 21-47483-1

Against:

FILED

ALEXANDAR JOVANOVIĆ, M.D.,

NOV - 2 2021

Respondent.

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

COMPLAINT

The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners (Board), by and through BRANDEE MOONEYHAN, J.D., Deputy General Counsel and attorney for the IC, having a reasonable basis to believe that ALEXANDAR JOVANOVIĆ, 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 a medical doctor holding an active license to practice medicine in the State of Nevada (License No. 18366) from October 7, 2018, until his license expired on June 30, 2021.²

2. On August 28, 2020, the Iowa Board of Medicine (Iowa Board) approved a combined Statement of Charges and Settlement Agreement with respect to Respondent's medical license in Iowa, which constituted a Final Order by the Iowa Board (Iowa Action).

3. In the Iowa Action, the Iowa Board charged Respondent with violating the standards of telemedicine in Iowa and alleged that he did so when he "failed to establish a valid

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 Bret W. Frey, M.D., Chair, Aury Nagy, M.D., and Col. Eric D. Wade, USAF (Ret.).

² NRS 630.298 provides: "The expiration of a license by operation of law or by order or decision of the Board or a court, or the voluntary surrender of a license by a licensee, does not deprive the Board of jurisdiction to proceed with any investigation of, or action or disciplinary proceeding against, the licensee or to render a decision suspending or revoking the license."

1 physician-patient relationship with patients receiving telemedicine services in Iowa; failed to
2 perform interviews of his patient sufficient for the diagnosis and treatment of patients in Iowa
3 prior to providing medical treatment, including issuing prescriptions; and prescribed medication to
4 patients in Iowa based solely on an internet questionnaire.”

5 4. Respondent entered into a Settlement Agreement with the Iowa Board, pursuant to
6 which he was: (1) cited for violating the standards of practice for telemedicine in Iowa, (2) warned
7 that engaging in such conduct in the future may result in further disciplinary action against his
8 Iowa medical license, (3) required to pay a civil penalty of five thousand dollars (\$5,000), and
9 (4) required to take corrective action to address the deficiencies in his practice of telemedicine.

10 5. On September 24, 2020, Respondent timely informed the Board of the Iowa
11 Action.³ See NRS 630.306(k).

12 **COUNT I**

13 **NRS 630.301(3) - Disciplinary Action by Another Licensing Board**

14 6. All of the allegations contained in the above paragraphs are hereby incorporated by
15 reference as though fully set forth herein.

16 7. NRS 630.301(3) provides that any disciplinary action, including, without
17 limitation, the revocation, suspension, modification or limitation of a license to practice any type
18 of medicine, taken by another state is grounds for initiating disciplinary action.

19 8. The Iowa Board took disciplinary action against Respondent on August 28, 2020,
20 as evidenced by the Iowa Action.

21 9. By reason of the foregoing, Respondent is subject to discipline by the Nevada
22 Board as provided in NRS 630.352.

23 **WHEREFORE**, the Investigative Committee prays:

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

27 _____
28 ³ As a result of the Iowa Board’s disciplinary action, the medical regulatory boards of at least fourteen (14)
other states have likewise imposed discipline against Respondent, namely: California, Florida, Georgia, Illinois,
Kansas, Michigan, Mississippi, New York, North Carolina, Oklahoma, Pennsylvania, Rhode Island, Texas, and
Virginia.

1 2. 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);

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

5 4. That the Board award fees and costs for the investigation and prosecution of this
6 case as outlined in NRS 622.400;

7 5. That the Board make, issue and serve on Respondent its findings of fact,
8 conclusions of law and order, in writing, that includes the sanctions imposed; and

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

11 DATED this 2d day of November, 2021.

12 INVESTIGATIVE COMMITTEE OF THE
13 NEVADA STATE BOARD OF MEDICAL EXAMINERS

14 By: Brandee Mooneyhan

15 BRANDEE MOONEYHAN, J.D.

16 Deputy General Counsel

17 9600 Gateway Drive

18 Reno, NV 89521

19 Tel: (775) 688-2559

20 Email: mooneyhanb@medboard.nv.gov

21 Attorney for the Investigative Committee
22
23
24
25
26
27
28

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

VERIFICATION

STATE OF NEVADA)
 : ss.
COUNTY OF WASHOE)

Bret W. Frey, 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 2 day of November, 2021.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:



BRET W. FREY, M.D.
Chairman of the Investigative Committee

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am employed by the Nevada State Board of Medical Examiners and
3 that on the 2nd day of November, 2021, I served a file-stamped copy of the foregoing
4 **COMPLAINT** via U.S. Certified Mail, to the following parties:

5 ALEXANDAR JOVANOVIĆH, M.D.
6 c/o Mark Bina, Esq.
7 Quarles & Brady LLP
8 300 N. LaSalle Street, Suite 4000
Chicago, IL 60654-3406
Tracking No.: 9171 9690 0935 0252 1578 70

9 Courtesy copy by electronic mail to:

10 MARK BINA, ESQ.
11 Mark.Bina@quarles.com

12 DATED this 2nd day of November, 2021.

13 
14 _____
15 MERCEDES FUENTES
16 Legal Assistant
17 Nevada State Board of Medical Examiners
18
19
20
21
22
23
24
25
26
27
28