


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

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4
5 **In the Matter of Charges and Complaint**
6 **Against:**
7 **MUHAMMAD A. SYED, M.D.,**
8 **Respondent.**
9

Case No. 21-30112-1

FILED
MAR - 2 2021
NEVADA STATE BOARD OF
MEDICAL EXAMINERS
By: 

10 **COMPLAINT**

11 The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners
12 (“Board”) hereby issues this formal Complaint against Muhammad A. Syed, M.D. (hereinafter
13 referred to as Respondent), a licensed physician in Nevada. After investigating this matter, the IC
14 has a reasonable basis to believe that Respondent has violated provisions of Nevada Revised
15 Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively,
16 the Medical Practice Act).

17 The IC alleges the following facts:

18 1. Respondent is currently, and was at all times relevant to this Complaint, licensed in
19 active status (License No. 11648). Respondent was initially issued his license from the Board on
20 October 5, 2005, pursuant to the provisions of NRS Chapter 630.

21 2. Patient A was a seventy-six (76) year-old female at the time of the events at issue.
22 Her true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
23 Designation served upon Respondent along with a copy of this Complaint.

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27 ¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time the filing of this
28 Complaint was approved, was composed of Rachakonda D. Prabhu, M.D., Ms. April Mastroluca, and
Victor M. Muro, M.D.

OFFICE OF THE GENERAL COUNSEL
Nevada State Board of Medical Examiners
9600 Gateway Drive
Reno, Nevada 89521
(775) 688-2559

1 3. On August 4, 2016, Patient A first presented to Respondent at Sunrise Hospital and
2 Medical Center (Sunrise Hospital), complaining of left lower extremity weakness. Respondent
3 examined Patient A and documented her medical history.

4 4. On August 18, 2016, Respondent accepted Patient A for admission into Sunrise
5 Hospital and performed another physical examination and documented the history of Patient A,
6 which included various comorbidities.

7 5. Patient A was also seen by various other providers during her stay at Sunrise
8 Hospital.

9 6. On August 23, 2016, Respondent discharged Patient A from Sunrise Hospital to
10 Las Vegas Post-Acute and Rehabilitation (LVPAR), a skilled facility. The discharge records
11 issued by Respondent were incomplete, failed to acknowledge, document, communicate and
12 coordinate services necessary for the continued care of Patient A. Additionally, Respondent did
13 not consult and coordinate Patient A's continued care with a provider at LVPAR.

14 7. After a brief stay at LVPAR, Patient A was discharged from the facility to her
15 home where she passed away on September 17, 2016.

16 **COUNT I**

17 **NRS 630.304(7) (Terminating the Medical Care of a Patient Without Making Other**
18 **Arrangements for the Continued Care of the Patient)**

19 8. All of the allegations in the above paragraphs are hereby incorporated by reference
20 as though fully set forth herein.

21 9. NRS 630.304(7) provides that terminating the medical care of a patient without
22 making other arrangements for the continued care of the patient constitutes grounds for initiating
23 disciplinary action against a licensee.

24 10. Respondent discharged Patient A from Sunrise Hospital and sent her to LVPAR.
25 Respondent's discharge records did not adequately capture the other hospital consultant
26 assessments, diagnostics, treatment, and quality of continuation of care upon transferring Patient
27 A to LVPAR.

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

3 **COUNT II**

4 **NRS 630.3062(1)(a) (Failure to Maintain Proper Medical Records)**

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

7 13. NRS 630.3062(1)(a) provides that the failure to maintain complete medical records
8 relating to the diagnosis, treatment and care of a patient constitutes grounds for initiating
9 disciplinary action against a licensee.

10 14. Respondent failed to maintain complete medical records relating to the diagnosis,
11 treatment and care of Patient A when he failed to completely document the coordination of
12 services relating to the current and ongoing care of Patient A.

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

15 **WHEREFORE**, the IC prays:

16 1. That the Nevada State Board of Medical Examiners give Respondent notice of the
17 charges herein against him and give him notice that he may file an answer to the Complaint herein
18 as set forth in NRS 630.339(2) within twenty (20) days of service of the Complaint;

19 2. That the Nevada State Board of Medical Examiners set a time and place for a
20 formal hearing after holding an Early Case Conference pursuant to NRS 630.339(3);

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

24 4. That the Nevada State Board of Medical Examiners award fees and costs as
25 described in NRS 622.400.

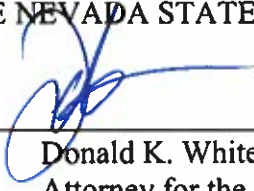
26 5. That the Nevada State Board of Medical Examiners make, issue and serve on
27 Respondent its findings of fact, conclusions of law and order, in writing, that includes the
28 sanctions imposed; and

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6. 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 2nd day of March, 2021.

INVESTIGATIVE COMMITTEE OF
THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

Donald K. White, Esq., Deputy General Counsel
Attorney for the Investigative Committee

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VERIFICATION

STATE OF NEVADA)
 : ss.
COUNTY OF CLARK)

Victor M. Muro, 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 2nd day of March, 2021.

INVESTIGATIVE COMMITTEE OF THE NEVADA
STATE BOARD OF MEDICAL EXAMINERS



Victor M. Muro, M.D., Chairman