

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. 21-12218-2

6   **Against:**

**FILED**

7   **RAJEEV SHARAD KHAMAMKAR, M.D.,**

**NOV 03 2021**

8   **Respondent.**

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS  
By: 

9  
10                                   **COMPLAINT**

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

17                   1.       Respondent was at all times relative to this Complaint a medical doctor holding an  
18 active license to practice medicine in the State of Nevada (License No. 8597). Respondent was  
19 originally licensed by the Board on April 8, 1998.

20                   2.       On November 19, 2020, Respondent's clinical privileges at Specialty Surgery  
21 Center, 7250 Cathedral Rock Dr. Las Vegas, NV 89128, were summarily suspended, indefinitely,  
22 pending hearing and appellate review process, because of concerns regarding his compliance with  
23 Specialty Surgery Center policies, procedures and practices. Hearing and appellate review  
24 processes were completed and the following action was taken: Respondent was ordered to  
25 complete approved professional courses on anger management, proper billing practices and  
26 maintaining safety of controlled substances and to remain on suspension until the successful  
27

28                   <sup>1</sup> 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 Victor M. Muro, M.D., Chair,  
Weldon Havins, M.D., J.D., and Ms. Maggie Arias-Petrel, Public Member.

1 completion of those courses; and Respondent must re-apply for privileges once the corrective  
2 action requirements have been satisfied.

3 3. This “adverse action” by Specialty Surgery Center was a sanction imposed on  
4 Respondent that is reportable to the National Practitioner Databank (NPDB) pursuant to Title IV  
5 of Public Law 99-660, “The Health Care Quality Improvement Act of 1986,” as amended  
6 42 USC Sec. 11101, January 26, 1998.

7 4. Specialty Surgery Center is a “health care entity” as defined by  
8 42 USC Sec. 11151(4)(a)(2), and, accordingly, properly reported this adverse action to the NPDB  
9 on or about December 8, 2020.

10 5. Pursuant to NRS 630.3068(1)(d), a physician is required to report to the Board  
11 “[a]ny sanctions imposed against the physician that are reportable to the National Practitioner  
12 Data Bank not later than 45 days after the sanctions are imposed.” *See* NRS 630.3068(1)(d).

13 6. Pursuant to NRS 630.3068(2), if the Board finds that a physician has violated any  
14 provision of NRS 630.3068, the Board may impose a fine of not more than \$5,000 against the  
15 physician for each violation, in addition to any other fines or penalties permitted by law.

16 7. Respondent did not report to the Board this adverse action within forty-five (45)  
17 days after the sanction was imposed.

18 **COUNT I**

19 **NRS 630.3062(1)(e) – Failure to Report Sanction Reportable to NPDB**

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

22 9. Pursuant to NRS 630.3062(1)(e), the failure of a physician to comply with the  
23 requirements of NRS 630.3068 is grounds for initiating disciplinary action or denying licensure.

24 10. As demonstrated by, but not limited to, the above-outlined facts, Respondent  
25 violated NRS 630.3068(1)(d) by failing to report the adverse action taken on November 19, 2020  
26 by Specialty Surgery Center, within forty-five (45) days of the action.

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

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

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

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

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

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

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

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

15 DATED this 3 day of November, 2021.

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

18 By:

19   
AARON BART ERICKE, J.D.

20 General Counsel  
21 9600 Gateway Drive

22 Reno, NV 89521

23 Tel: (775) 688-2559

24 Email: [africke@medboard.nv.gov](mailto:africke@medboard.nv.gov)

25 *Attorney for the Investigative Committee*  
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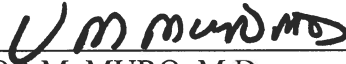
**VERIFICATION**

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 3 day of November, 2021.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:   
VICTOR M. MURO, 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 3rd 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 RAJEEV SHARAD KHAMAMKAR, M.D.  
6 1930 Village Center Circle, Suite 3-999  
7 Las Vegas, NV 89134  
8 *Tracking No.:* 9171 9690 0935 0252 1578 94

8 Courtesy copy by electronic mail to:

9 CINEMA GREENBURG, ESQ.  
10 Law Office of Cinema Greenburg  
11 6930 South Cimarron Road, Ste. 140  
12 Las Vegas, NV 89113  
13 atlaattorney@yahoo.com  
14 *Attorney for Respondent*

14 DATED this 3rd day of November, 2021.

16   
17 MERCEDES FUENTES  
18 Legal Assistant  
19 Nevada State Board of Medical Examiners  
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