

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. 21-43525-1

6 **Against:**

FILED

7 **VISHAL VERMA, M.D.,**

MAY - 7 2021

8 **Respondent.**

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

9
10 **COMPLAINT**

11 The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners
12 (Board), by and through BRANDEE MOONEYHAN, J.D., Deputy General Counsel and attorney
13 for the IC, having a reasonable basis to believe that VISHAL VERMA, M.D., (Respondent) violated
14 the provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code
15 (NAC) Chapter 630 (collectively, the Medical Practice Act), hereby issues its Complaint, stating the
16 IC's 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. 15952). Respondent was
19 originally licensed by the Board on July 1, 2015.

20 2. On January 31, 2020, the Maryland State Board of Physicians (Maryland Board)
21 issued a Final Decision and Order concluding that Respondent had dispensed prescription
22 medicine without a required dispensing permit, willfully made a false representation when
23 applying for licensure, and engaged in unprofessional conduct in the practice of medicine. As a
24 consequence, the Maryland Board reprimanded Respondent; placed him on probation for a
25 minimum of six (6) months, with conditions that he complete continuing medical education

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28 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 Mr. M. Neil Duxbury, Chair, Aury Nagy, M.D., and Michael C. Edwards, M.D., FACS.

1 courses on telemedicine, prescribing of medication, and recordkeeping; and imposed against him a
2 civil fine of fifty thousand dollars (\$50,000).

3 3. On February 18, 2020, Respondent timely informed the Board of the discipline
4 imposed on him by the Maryland Board.²

5 **COUNT I**

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

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

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

12 6. The Maryland Board took disciplinary action against Respondent on
13 January 31, 2020.

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

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

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

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

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

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

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28 ² As a result of the Maryland Board's disciplinary action, the medical regulatory boards of at least 19 other states have likewise imposed discipline against Respondent, namely: Alabama, California, Colorado, Florida, Georgia, Hawaii, Illinois, Kentucky, Massachusetts, Mississippi, New Mexico, New York, North Carolina, Rhode Island, Tennessee, Virginia, Washington, West Virginia, and Wisconsin.

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5. 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

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

DATED this 7th day of May, 2021.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: Brandee Mooneyhan
BRANDEE MOONEYHAN, J.D.
Deputy General Counsel
9600 Gateway Drive
Reno, NV 89521
Tel: (775) 688-2559
Email: mooneyhanb@medboard.nv.gov
Attorney for the Investigative Committee

1 VERIFICATION

2 STATE OF NEVADA)
3 : ss.
4 COUNTY OF WASHOE)

5 Mr. M. Neil Duxbury, M.D., having been duly sworn, hereby deposes and states under
6 penalty of perjury that he is the Chairman of the Investigative Committee of the Nevada State
7 Board of Medical Examiners that authorized the Complaint against the Respondent herein; that he
8 has read the foregoing Complaint; and that based upon information discovered in the course of the
9 investigation into a complaint against Respondent, he believes that the allegations and charges in
10 the foregoing Complaint against Respondent are true, accurate and correct.

11 DATED this 4TH day of May, 2021.

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

14 By:

15 M. Neil Duxbury
16 M. NEIL DUXBURY
17 *Chairman for the Investigative Committee*

CERTIFICATE OF SERVICE

I hereby certify that I am employed by the Nevada State Board of Medical Examiners and that on the 7th day of May, 2021, I served a file-stamped copy of the foregoing **COMPLAINT**, via U.S. Certified Mail to the following parties:

VINCENT ROTH, ESQ.
General Counsel
13280 Evening Creek Drive, Ste. 225
San Diego, California 92128
Certified Mail Receipt No.:
9171 9690 0935 0255 6180 95

DATED this 7th day of May, 2021.


MERCEDES FUENTES
Legal Assistant
Nevada State Board of Medical Examiners

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