

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**
6 **Complaint Against:**
7 **SAJJAD EJAZ KAMBOJ, M.D.,**
8 **Respondent.**

Case No. 21-8734-1

FILED

MAR - 3 2021

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 Robert G. Kilroy, Esq., General Counsel and attorney for the IC, having a
13 reasonable basis to believe that Sajjad Ejaz Komboj, M.D. (Respondent) violated the provisions of
14 Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630
15 (collectively, the Medical Practice Act), hereby issues its Complaint, stating the IC's charges and
16 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. 9203). Respondent was
19 originally licensed by the Board on October 20, 1999.

20 2. On June 28, 2018, Patient A² presented to Respondent for an electrocardiogram.
21 Due to a disagreement between the Patient A and Respondent, this patient encounter did not result
22 in any medical care being provided by Respondent. Subsequently, on July 2, 2018, Patient A
23 reported a grievance against Respondent regarding his demeanor and his staffs' conduct.

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27 ¹ The 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

² Patient A's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
 Designation served upon Respondent along with a copy of this Complaint.

COUNT II

NRS 630.3062(1)(a) - (Failure to Maintain Complete Medical Records)

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

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

14. Respondent failed to maintain complete medical records relating to the diagnosis, treatment and care of Patient A, by failing to document his interactions with Patient A on June 28, 2018. Patient A's medical records were not timely, legible, accurate, and complete, because Respondent did not document anything regarding this patient encounter.

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

WHEREFORE, the Investigative Committee prays:

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

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

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

4. 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;

5. That the Board awards such fees and costs outlined in NRS 622.400 for the investigation and prosecution of this disciplinary action; and

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OFFICE OF THE GENERAL COUNSEL

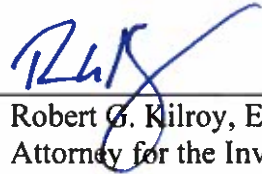
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6. That the Board take such other and further action as may be just and proper in these premises.

DATED this 3 day of March, 2021.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 
Robert G. Kilroy, Esq., General Counsel
Attorney for the Investigative Committee

