BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

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In the Matter of Charges and

Complaint Against: 6

SAJJAD EJAZ KAMBOJ, M.D.,

Respondent.

Case No. 21-8734-1

FILED

MAR - 3 2021

NEVADA STATE BOARD OF MEDICAL EXAMINERS

COMPLAINT

The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners (Board), by and through Robert G. Kilroy, Esq., General Counsel and attorney for the IC, having a reasonable basis to believe that Sajjad Ejaz Komboj, 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:

- Respondent was at all times relative to this Complaint a Medical Doctor holding an 1. active license to practice medicine in the State of Nevada (License No. 9203). Respondent was originally licensed by the Board on October 20, 1999.
- On June 28, 2018, Patient A² presented to Respondent for an electrocardiogram. 2. Due to a disagreement between the Patient A and Respondent, this patient encounter did not result in any medical care being provided by Respondent. Subsequently, on July 2, 2018, Patient A reported a grievance against Respondent regarding his demeanor and his staffs' conduct.

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²⁶ 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, Chairman, Aury Nagy, 27 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.

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- 3. On August 14, 2018, the IC issued an Order to Produce Health Care Records to the Respondent regarding his encounter and treatment of Patient A and an allegation letter seeking his response to the allegations contained therein.
- 4. The IC attempted multiple times to communicate with Respondent about disclosure of the requested medical records. After several unproductive conversations with Respondent and Respondent's staff, who continually asserted the medical records of Patient A were in route to be delivered to the IC, it was disclosed that no records actually exist for Patient A.
- On February 18, 2020, Respondent informed the IC that he had responded to the allegation letter and that there were no medical records for Patient A. Respondent informed the IC, more than five hundred thirty-two (532) days after the deadline for responding to the Board's Order for records, that he was unable to produce any medical records for Patient A.

COUNT I

NRS 630.3065(2)(a) (Failure to Comply with a Board Order)

- 6. All of the allegations in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- On August 14, 2018, the IC sent Respondent an Order to Produce Medical Records 7. which provided twenty-one (21) days to respond with medical records for the subject patient.
- Respondent did not send Patient A's medical records within the allotted twenty-one 8. (21) days.
- 9. NRS 630.3065(2)(a) provides that the knowing or willful failure to comply with an order of the Board constitutes grounds for initiating disciplinary action.
- Respondent failed to comply with an Order of the Board when he failed to advise the 10. existence and/or location of the subject Patient A's medical records to the IC.
- By reason of the foregoing, Respondent is subject to discipline by the Board as 11. provided in NRS 630.352.

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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:

- 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);
- That the Board determine what sanctions to impose if it determines there has been 3. 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;
- That the Board awards such fees and costs outlined in NRS 622.400 for the 5. investigation and prosecution of this disciplinary action; and

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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 6. Kilroy, Esq., General Counsel Attorney for the Investigative Committee

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners

VERIFICATION

STATE OF NEVADA)
	: ss
COUNTY OF WASHOE)

M. Neil Duxbury, 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 3rd day of March, 2021.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

JEIL TAMBURY

By:

Mr. M. Neil Duxbury, Chairman

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners 9600 Gateway Drive Reno, Nevada 89521

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

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5 In the Matter of Charges and

Complaint Against:

SAJJAD EJAZ KAMBOJ, M.D.,

Respondent.

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Case No. 21-12891-1

FILED

APR 2 6 2021

NEVADA STATE BOARD OF MEDICAL EXAMINERS

ERRATA

The Investigative Committee (IC) of the Nevada State Board of Medical Examiners (Board), by and through Robert G. Kilroy, Esq., Senior Deputy General Counsel and attorney for the IC hereby submits this Errata to the pleadings filed in this case. An inadvertent clerical error was discovered in the case number on the pleadings for this case and should not read 21-8734-1 and instead should read 21-12891-1.

DATED this 2021.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

RIK

ROBERT G. KILROY, J.D. Senior Deputy General Counsel 9600 Gateway Drive Reno, NV 89521

Tel: (775) 688-2559

Email: rkilroy@medboard.nv.gov

Attorney for the Investigative Committee