

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

3 \* \* \* \* \*

4  
5 **In the Matter of Charges and**  
6 **Complaint Against:**  
7 **SAJJAD EJAZ KAMBOJ, M.D.,**  
8 **Respondent.**

Case No. 21-8734-3

FILED

FEB 18 2021

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 Robert G. Kilroy, Esq., General Counsel and attorney for the IC, having a  
13 reasonable basis to believe that Sajjad Ejaz Kamboj, 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. A grievance was reported to the IC alleging that Patient A<sup>2</sup> complained of chest  
21 pain for many years to Respondent without resolution eventually leading to Patient A's demise.

22 3. Approximately two thousand four hundred forty-two (2,442) pages of  
23 correspondence and medical records were reviewed by the IC for Patient A. It was discovered  
24 upon the review of the medical records that an extensive amount of "cloning" of prior records  
25 occurred without further analysis or treatment for years.

26  
27 <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 Mr. M. Neil Duxbury, Chairman, Aury Nagy,  
M.D. and Michael C. Edwards, M.D., FACS

28 <sup>2</sup> 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

1           4.       Within Patient A's medical records, under the "Subjective" section, Respondent  
2 used the same language ("cloning") regarding Patient A's medical condition, "He denies any  
3 significant problems other than some chest pain and shortness of breath." This aforementioned  
4 language was the same for all of the following visits with Patient A: November 16, 2012,  
5 March 7, 2012, August 29, 2012, December 12, 2012, June 26, 2013, July 24, 2013,  
6 November 7, 2013, June 18, 2014 (at this encounter, Respondent recommends several tests  
7 including a sleep study, a cardiac stress test, and an echocardiogram), December 14, 2017,  
8 February 17, 2015 (Respondent documents a "murmur" and a showing of mild LVH and  
9 AV sclerosis), February 19, 2015 (Respondent documents a normal nuclear treadmill stress test),  
10 February 5, 2015, May 6, 2015, September 9, 2015, March 2, 2016 (Respondent documents a  
11 hepatocellular carcinoma diagnosis), June 8, 2016 (Respondent documents the following:  
12 "questionable atypical chest pain, left arm pain has subsided, complaining of some left arm pain,  
13 denies any significant chest pain, some chest pain and shortness of breath more than likely  
14 secondary to hypertension, and clear him for surgery as a high cardiac risk"), September 7, 2016  
15 (Respondent documents clone language from the June 8, 2016 record); September 21, 2016 (is the  
16 same as the June 8, 2016 record); November 30, 2016 (Respondent documents diagnosis of sleep  
17 apnea and uses the same clone language), July 5, 2017 (Respondent notes sleep apnea and uses the  
18 same clone language), and July 25, 2018 (Respondent notes "due to some software-related issues  
19 we are not able to download and save the echocardiogram and informed [Patient A] that he would  
20 have to come back to do another echocardiogram.").

21           5.       On September 23, 2019, Respondent replied to the IC's allegation letter and stated  
22 that Patient A's care was "free of charge for many years...had cardiac issues but never of a  
23 concern at that time...he never complained of chest pain."

#### COUNT I

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

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

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

4           8.     Respondent failed to maintain complete medical records relating to the diagnosis,  
5 treatment and care of Patient A when Respondent used cloned phrases and documented  
6 contradictory and mutually exclusive remarks as noted previously. Patient A's medical records  
7 indicate that he was experiencing chest pain from 2011 through the end of 2015 without any  
8 acknowledgement, explanation, assessment or treatment by Respondent.

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

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

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

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

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

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

21           5.     That the Board award fees and costs as outlined in NRS 622.400 for the  
22 investigation and prosecution of this disciplinary action; and

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

25           DATED this 18 day of February, 2021.

26                     INVESTIGATIVE COMMITTEE OF THE  
27                     NEVADA STATE BOARD OF MEDICAL EXAMINERS

28           By:           RGK            
                           Robert G. Kilroy, Esq., General Counsel

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**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 18<sup>th</sup> day of February, 2021.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: M. NEIL DUXBURY  
Mr. M. Neil Duxbury, Chairman

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

3                                   \* \* \* \* \*

4  
5   **In the Matter of Charges and**  
6   **Complaint Against:**  
7   **SAJJAD EJAZ KAMBOJ, M.D.,**  
8   **Respondent.**

Case No. 21-12891-3

**FILED**

**APR 26 2021**

**NEVADA STATE BOARD OF  
MEDICAL EXAMINERS**


By: 

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10                                   **ERRATA**

11                   The Investigative Committee (IC) of the Nevada State Board of Medical Examiners (Board),  
12 by and through Robert G. Kilroy, Esq., Senior Deputy General Counsel and attorney for the IC  
13 hereby submits this Errata to the pleadings filed in this case. An inadvertent clerical error was  
14 discovered in the case number on the pleadings for this case and should not read 21-8734-3 and  
15 instead should read 21-12891-3.

16 DATED this 26<sup>th</sup> day of April, 2021.

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

19  
20 By: 

21                   ROBERT G. KILROY, J.D.  
22                   Senior Deputy General Counsel  
23                   9600 Gateway Drive  
24                   Reno, NV 89521  
25                   Tel: (775) 688-2559  
26                   Email: [rkilroy@medboard.nv.gov](mailto:rkilroy@medboard.nv.gov)

27                   *Attorney for the Investigative Committee*  
28

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