

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 **NAYAB MOHAMMAD ZAFAR, M.D.,**  
8 **Respondent.**  
9

Case No. 22-34257-1

FILED

MAR 10 2022

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS

By: \_\_\_\_\_

10 **COMPLAINT**

11 The Investigative Committee<sup>1</sup> (IC) of the Nevada State Board of Medical Examiners  
12 (Board), by and through Donald K. White, J.D., Senior Deputy General Counsel and attorney for the  
13 IC, having a reasonable basis to believe that Nayab Mohammad Zafar, 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. 12883). Respondent was  
19 originally licensed by the Board on September 8, 2008.

20 2. Patient A<sup>2</sup> was a sixty-eight (68) year-old female at the time of the events at issue.

21 3. On May 21, 2013, Respondent examined Patient A and noted that she had a recent  
22 computed tomography (CT) angiography, showing 70% stenosis of the left internal carotid artery.

23 4. Respondent also noted that Patient A presented a high surgical risk due to several  
24 factors. Respondent recommended that Patient A be scheduled for a carotid angiography and  
25 possible intervention, depending on the results of the carotid angiogram.  
26

27 <sup>1</sup> 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 Wayne Hardwick, M.D., Mr. M. Neil  
Duxbury, Aury Nagy, M.D.

<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           5.       Patient A presented to Respondent on June 11, 2013, for a carotid aortogram and  
2 arch aortogram. Respondent noted that Patient A had 80% stenosis of the left common carotid  
3 artery and it was calcified.

4           6.       On June 18, 2013, at a follow up visit, Respondent recommended, due to various  
5 factors, a balloon angioplasty and stent placement with an embolic protection device. Respondent  
6 noted that Patient A was not a good candidate for endarterectomy.

7           7.       On July 1, 2013, Respondent performed the carotid stent procedure on Patient A.  
8 To reduce the risk of embolism during the procedure, Respondent employed the use of a filter  
9 wire.

10          8.       Indications show that Respondent's diagnosis, risk assessment, procedural  
11 indication, procedural decision making, and technique with regards to treating Patient A all  
12 appeared to be appropriate.

13          9.       However, Respondent chose to use a hydrophilic glide wire as the "buddy" wire.  
14 Hydrophilic wires, because of the wire's coating, are more likely to become stuck if placed  
15 between two hard surfaces, e.g., the metal of a stent and a heavily calcified lesion. This is a  
16 particular problem if the hydrophilic wire is not removed before stent deployment.

17          10.       Unfortunately, the stent had been deployed, trapping the hydrophilic wire (buddy  
18 wire) between the calcified lesion and the stent.

19          11.       Respondent had considered and decided to also use a filter wire to protect against  
20 the likelihood of embolism, due to the stent's ability to break off pieces of the calcification during  
21 the process.

22          12.       Due to the hydrophilic wire (buddy wire) being trapped, however, the hydrophilic  
23 wire became the working wire and the filter wire became the buddy wire.

24          13.       There was then no safe possible way to extract the filter wire unless the filter was  
25 collapsed and removed, thereby removing the protection against cerebral embolism, which would  
26 increase the the risk of intra-procedural stroke.

27          14.       Due to the entrapment of the filter wire, emergency surgical retrieval of the  
28 endovascular wire and stent was required, and performed.



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


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 10<sup>th</sup> day of March, 2022.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

  
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DONALD K. WHITE, J.D.  
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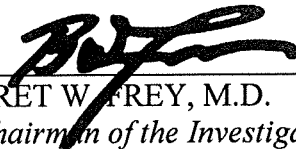
**VERIFICATION**

STATE OF NEVADA        )  
                                  : ss.  
COUNTY OF WASHOE    )

Bret W. Frey, 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 10<sup>th</sup> day of March, 2022.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:   
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BRET W. FREY, M.D.  
*Chairman of the Investigative Committee*