

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 Complaint**

Case No. 22-28048-1

6 **Against:**

FILED

7 **ZIAD AHMED SAWI, M.D.,**

JUL 29 2022

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 Donald K. White, J.D., Senior Deputy General Counsel and attorney for
13 the IC, having a reasonable basis to believe that Ziad Ahmed Sawi, 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
16 the 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. 10533). Respondent was
19 originally licensed by the Board on July 1, 2003.

20 2. Patient A² was a thirty-six (36) year-old male at the time of the events at issue.

21 3. On March 2, 2018, Patient A had sustained multiple injuries in a motorcycle
22 collision. Of these injuries, the pertinent injury was a hangman's fracture of the neck. Patient A
23 was scheduled for surgery on March 4, 2018. Respondent was assigned as the anesthesiologist for
24 the surgery.

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27 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 Bret W. Frey, M.D., Chowdhury H. Ahsan,
28 M.D., Ph.D., FACC, and Col. Eric D. Wade, USAF (Ret.).

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.

1 4. During the surgery, ventilation of Patient A became increasingly difficult to
2 stabilize and had to be turned to the supine position. A bronchoscopy was performed to identify
3 any obstruction of the endotracheal tube. Patient A was extubated and reintubated, and became
4 asystolic and eventually lost his life.

5 5. The medical records prepared by Respondent do not include the exact times of the
6 bronchoscopy or the second intubation. The records are also not clear on the events that occurred
7 during the surgery, the inadequacy of the ventilation of Patient A, and whether Patient A was
8 monitored appropriately during the bronchoscopy and reintubation.

9 **COUNT I**

10 **NRS 630.301(4) - Malpractice**

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

13 7. NRS 630.301(4) provides that malpractice of a physician is grounds for initiating
14 disciplinary action against a licensee.

15 8. NAC 630.040 defines malpractice as “the failure of a physician, in treating a
16 patient, to use the reasonable care, skill, or knowledge ordinarily used under similar
17 circumstances.”

18 9. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed
19 to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when
20 he failed to properly ventilate and monitor Patient A during the surgery on March 4, 2018, causing
21 hypoxemia, hypoxia and leading to cardiac arrest.

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

24 **COUNT II**

25 **NRS 630.3062(1)(a) - Failure to Maintain Proper Medical Records**

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

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1 12. 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” constitute
3 grounds for initiating discipline against a licensee.

4 13. Respondent failed to maintain accurate and complete medical records relating to
5 the diagnosis, treatment and care of Patient A, by failing to accurately and completely document
6 his actions when he treated Patient A.

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

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

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

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

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

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

19 5. 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; and

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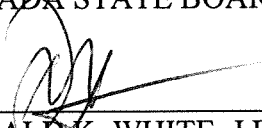
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6. That the Board take such other and further action as may be just and proper in these premises.

DATED this 29th day of July, 2022.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:



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 29th day of July, 2022.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

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