

OFFICE OF THE GENERAL COUNSEL
Nevada State Board of Medical Examiners
9600 Gateway Drive
Reno, Nevada 89521
(775) 688-2559

BEFORE THE BOARD OF MEDICAL EXAMINERS
OF THE STATE OF NEVADA

* * * * *

In the Matter of Charges and Complaint
Against:
AJUMOBI CHARLES AGU, M.D.,
Respondent.

Case No. 23-12518-1

FILED

JUL 11 2023

NEVADA STATE BOARD OF
MEDICAL EXAMINERS

By: 

COMPLAINT

The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners (Board) hereby issues this formal Complaint against Ajumobi Charles Agu, M.D., (Respondent), a licensed physician in Nevada. After investigating this matter, the IC has a reasonable basis to believe that Respondent has violated provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical Practice Act).

The IC alleges the following facts:

1. Respondent is currently licensed in suspended status (License No. 8857). Respondent was issued his license from the Board on November 23, 1998, pursuant to the provisions of NRS Chapter 630.

2. On November 15, 2022, Respondent entered into a Settlement Agreement with the IC and the Board approved the agreement on December 2, 2022.

3. Per the terms of the Settlement Agreement, Respondent was to submit to and pass all five (5) sections of the Ethics and Boundaries Assessment Services (EBAS) examination within sixty (60) days of the Board's acceptance, adoption, and approval of the Agreement. The Settlement Agreement was approved and adopted on December 2, 2022, requiring completion of the terms on or before January 31, 2023.

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., Carl N. Williams, Jr., M.D., FACS, and Col. Eric D. Wade, USAF (Ret.).

1 4. Additionally, Respondent was to perform ten (10) hours of Continuing Medical
2 Education relating to best practices in medical record keeping with six (6) months from the date of
3 the Board's acceptance, adoption, and approval of the Settlement Agreement. The Settlement
4 Agreement was approved and adopted on December 2, 2022, requiring completion of the ten (10)
5 hours of Continuing Medical Education (CME) to be completed by June 2, 2023.

6 5. Respondent registered for the EBAS examination on March 14, 2023, for an April
7 25, 2023, exam date.

8 6. On March 17, 2023, Board staff received notice from Ethics and Boundaries
9 Assessment Services that the Respondent failed all five (5) sections of the EBAS examination on
10 April 25, 2023.

11 7. On June 28, 2023, Respondent furnished a certificate of completion for the
12 aforementioned hours of Continuing Medical Education with a completion date of June 26, 2023.

13 **COUNT I**

14 **NRS 630.3065(2)(a) - Knowing or Willful Failure to Comply with a Board Order**

15 8. All of the allegations in the above paragraphs are hereby incorporated by reference
16 as though fully set forth herein.

17 9. NRS 630.3065(2)(a) provides that the knowing or willful failure to comply with an
18 order of the Board constitutes grounds for initiating disciplinary action.

19 10. Respondent knowingly or willfully failed to comply with an order of the Board
20 when he failed all five (5) sections of the EBAS examination. Additionally, Respondent did not
21 timely complete his CME hours by the June 2, 2023 deadline and completed them instead on
22 June 26, 2023, twenty-four (24) days after the date ordered by the Board.

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

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

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

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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; and

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

DATED this 11th day of July, 2023.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:



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VERIFICATION

STATE OF NEVADA)
 : ss.
COUNTY OF CLARK)

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 11th day of July, 2023.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

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