

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

3                                   \* \* \* \* \*

4  
5 **In the Matter of Charges and Complaint**

Case No. 23-8517-1

6 **Against:**

**FILED**

7 **MICHAEL EUGENE CLIFFORD, M.D.,**

DEC - 6 2023

8 **Respondent.**

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 Ian J. Cumings, Deputy General Counsel and attorney for the IC, having  
13 a reasonable basis to believe that Michael Eugene Clifford, M.D. (Respondent) violated the  
14 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. 5960). Respondent was  
19 originally licensed by the Board on December 2, 1989. Respondent's specialty is listed as  
20 rheumatology.

21                   2.       Patient A<sup>2</sup> was a seventy-three (73) year-old female at the time of the events at  
22 issue.

23                   3.       On September 12, 2019, Patient A presented to Respondent's practice following a  
24 referral from another provider. Patient A had a relevant medical history of glaucoma, diabetes,  
25 peripheral artery disease, end stage renal failure, hypertension, and heart failure.

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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 Aury Nagy, M.D., Ms. Maggie Arias-Petrel,  
and Nick M. Spirtos, M.D., F.A.C.O.G.

<sup>2</sup> Patient A's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient  
Designation served upon Respondent along with a copy of this Complaint.

1 4. Prior to her referral to Respondent, Patient A had been diagnosed with iritis,  
2 causing inflammatory eye symptoms, and received an injection in her right eye in addition to  
3 steroid drops which had been ineffective at treating her iritis.

4 5. Respondent failed to contact Patient A's referring physician. Despite Patient A's  
5 end stage renal failure, Respondent prescribed Patient A with 15mg per week of methotrexate, an  
6 immunosuppressive drug, and folic acid.

7 6. Patient A took the methotrexate on September 20, 2019, and September 27, 2019.  
8 Patient A presented to an urgent care facility three (3) days later on September 30, 2019, unable to  
9 swallow, and exhibiting facial edema.

10 7. On October 4, 2019, Patient A was hospitalized and documented to have low  
11 hemoglobin, a low white blood cell count, and a low platelet count. Patient A was diagnosed with  
12 myelosuppression due to the effects of the methotrexate prescribed by Respondent.

13 8. Patient A was diagnosed with orbital cellulitis secondary to invasive mucormycosis  
14 with profound and worsening leukocytosis secondary to other infections. Patient A was treated  
15 for the infections but continued decline and ultimately succumbed on October 26, 2019.

### 16 COUNT I

#### 17 **NRS 630.301(4) - Malpractice**

18 9. All of the allegations contained in the above paragraphs are hereby incorporated by  
19 reference as though fully set forth herein.

20 10. NRS 630.301(4) provides that malpractice of a physician is grounds for initiating  
21 disciplinary action against a licensee.

22 11. NAC 630.040 defines malpractice as "the failure of a physician, in treating a  
23 patient, to use the reasonable care, skill, or knowledge ordinarily used under similar  
24 circumstances."

25 12. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed  
26 to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when  
27 rendering medical services to Patient A by prescribing methotrexate which is contraindicated in  
28 patients with end state renal disease and on dialysis.

OFFICE OF THE GENERAL COUNSEL

Nevada State Board of Medical Examiners  
9600 Gateway Drive  
Reno, Nevada 89521  
(775) 688-2559

1           13.    By reason of the foregoing, Respondent is subject to discipline by the Board as  
2 provided in NRS 630.352.

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

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

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

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

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

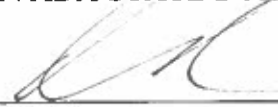
13          5.    That the Board make, issue and serve on Respondent its findings of fact,  
14 conclusions of law and order, in writing, that includes the sanctions imposed; and

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

17           DATED this 6<sup>th</sup> day of December, 2023.

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

20           By:

21     
22   \_\_\_\_\_  
23   IAN J. CUMINGS  
24   Deputy General Counsel  
25   9600 Gateway Drive  
26   Reno, NV 89521  
27   Tel: (775) 688-2559  
28   Email: [icumings@medboard.nv.gov](mailto:icumings@medboard.nv.gov)  
  Attorney for the Investigative Committee

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VERIFICATION

STATE OF NEVADA            )  
  : ss.  
COUNTY OF CLARK         )

Aury Nagy, 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 6<sup>th</sup> day of December, 2023.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:   
AURY NAGY, M.D.  
*Chairman of the Investigative Committee*