



1           5.       On October 26, 2022, Patient A was seen by a perinatologist at a high-risk  
2 pregnancy center due to her twin pregnancy and diagnosed with gestational diabetes. Patient A's  
3 pregnancy continued to be monitored with serial ultrasounds.

4           6.       On November 22, 2022, Respondent lost his hospital privileges at Renown  
5 Regional Medical Center (Renown Hospital) following a voluntary surrender of his clinical  
6 privileges while under, or to avoid, an investigation relating to his professional competence or his  
7 conduct.

8           7.       On February 8, 2023, Patient A underwent ultrasound testing at the high-risk  
9 pregnancy center which indicated Twin A was growth restricted. Following Twin A's diagnosis  
10 of growth restriction, Patient A was recommended to deliver sometime between thirty-six (36) and  
11 thirty-seven (37) weeks of gestation by her perinatologist and to continue to receive ultrasound  
12 testing every two (2) weeks to monitor her pregnancy.

13          8.       On March 30, 2023, at thirty-six (36) weeks pregnant, Patient A underwent further  
14 ultrasound testing that was performed by the perinatologist which demonstrated little growth from  
15 the previous ultrasound on March 13, 2023. The perinatologist recommended delivery between  
16 thirty-six weeks (36) and thirty-six weeks and three days (36.3) weeks.

17          9.       On March 30, 2023, Patient A was seen by Respondent who performed a  
18 membrane sweep on Patient A to help induce labor. As Respondent did not have hospital  
19 privileges and was unable to fully induce labor in Patient A nor deliver Patient A's children, he  
20 instructed her to present to the emergency department at Renown Hospital should she go into  
21 labor.

22          10.      Respondent failed to refer Patient A to an appropriate care provider or physician  
23 group who could properly induce Patient A for delivery of her pregnancy, despite his knowledge  
24 of the perinatologist's delivery recommendation.

25          11.      On April 1, 2023, Patient A had yet to go into labor, and presented to Renown  
26 Hospital for delivery of her children within the recommended time given to her by the  
27 perinatologist. Patient A ultimately delivered her children by cesarean section on April 2, 2023, at  
28 Renown Hospital by a physician with privileges at the hospital.





1           28.    As demonstrated by, but not limited to, the above-outlined facts, Respondent's  
2 conduct was unsafe and unprofessional when he continued to provide obstetrical care to Patient A  
3 without making the proper arrangements with an obstetrical care provider who possessed  
4 privileges to practice to deliver Patient A's pregnancy, exposing Patient A and her children to an  
5 unacceptable and high-risk of complications during delivery. Respondent's conduct was unsafe  
6 and unprofessional.

7           29.    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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6. That the Board take such other and further action as may be just and proper in these premises.

DATED this 5th day of September, 2023.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:



IAN J. CUMINGS  
Deputy General Counsel  
9600 Gateway Drive  
Reno, NV 89521  
Tel: (775) 688-2559  
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 5th day of September, 2023.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:



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