

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. 24-28982-1

6 **Against:**

FILED

7 **ABDOLLAH ASSAD, M.D.,**

AUG 14 2024

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 Ian J. Cumings, Senior Deputy General Counsel and attorney for the IC,
13 having a reasonable basis to believe that Abdollah Assad, 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. 10883). Respondent was
19 originally licensed by the Board on April 8, 2004.

20 2. Patient A² was a thirty-one (31) year-old female at the time of the events at issue.

21 3. During the relevant time period, Patient A was a long-established psychiatric
22 patient of Respondent, having regular visits being under Respondent's care and treatment since
23 June 23, 2011. During these regular visits, Respondent documented a history of anxiety and
24 problematic relationships that included her difficult relationship with her boyfriend on repeated
25 occasions. Respondent's records from these visits are handwritten and largely illegible.

26
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 Chowdhury H. Ahsan, M.D., Ph.D, FACC,
28 Ms. Pamela J. Beal and Irwin B. Simon, M.D., FACS.

² 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 inappropriate sexual relationship with Patient A while still continuing to see her as his patient and
2 prescribe her Adderall.

3 12. By reason of the foregoing, Respondent is subject to discipline by the Board as
4 provided in NRS 630.352.

5 **COUNT II**

6 **NRS 630.304(5) – Influencing a Patient to Engage in Sexual Activity**

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

9 14. NRS 630.304(5) provides that influencing a patient in order to engage in sexual
10 activity with the patient or others is grounds for initiating disciplinary action.

11 15. As demonstrated by, but not limited to, the above-outlined facts, Respondent
12 influenced Patient A by failing to properly admit her to an appropriate care facility or get
13 Patient A emergency assistance following a suicide attempt despite her documented history of
14 troubled relationships, but instead took Patient A to a motel and engaged in sexual intercourse
15 with her.

16 16. By reason of the foregoing, Respondent is subject to discipline by the Board as
17 provided in NRS 630.352.

18 **COUNT III**

19 **NRS 630.301(5) – Engaging in Sexual Activity with a Patient**

20 17. All of the allegations contained in the above paragraphs are hereby incorporated by
21 reference as though fully set forth herein.

22 18. NRS 630.301(5) provides that engaging by a practitioner in any sexual activity
23 with a patient who is currently being treated by the practitioner constitutes grounds for initiating
24 disciplinary action.

25 19. As demonstrated by, but not limited to, the above-outlined facts, Respondent
26 engaged in sexual intercourse with Patient A and subsequently continued to prescribe controlled
27 substances to her as her physician.

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COUNT VI

**NRS 630.301(7) – Violation of Patient Trust and Exploitation of Physician and Patient
Relationship for Financial or Personal Gain**

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

30. NRS 630.301(7) provides that “engaging in conduct that violates the trust of a patient and exploits the relationship between the physician and the patient for financial or other personal gain” is grounds for initiating discipline against a licensee.

31. As demonstrated by, but not limited to, the above-outlined facts, Respondent violated the trust of a patient and exploited the relationship between the Respondent and Patient A by gaining intimate knowledge of Patient A during psychiatric treatment, and subsequently engaging in a sexual relationship with Patient A while she was in a vulnerable state.

32. 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

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OFFICE OF THE GENERAL COUNSEL
Nevada State Board of Medical Examiners
9600 Gateway Drive
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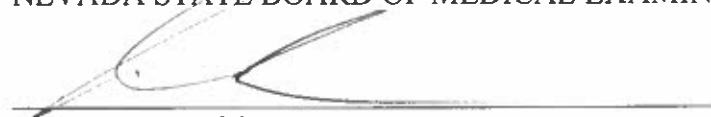
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6. That the Board take such other and further action as may be just and proper in these premises.

DATED this 14th day of August, 2024.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:


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VERIFICATION

STATE OF NEVADA)
 : ss.
COUNTY OF CLARK)

Chowdhury H. Ahsan, M.D., Ph.D., FACC, 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 14th day of August, 2024.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

CHOWDHURY H. AHSAN, M.D., PH.D., FACC
Chairman of the Investigative Committee