





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

3 **COUNT II**

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

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

7 13. NRS 630.3062(1)(a) provides that the “failure to maintain timely, legible, accurate  
8 and complete medical records relating to the diagnosis, treatment and care of a patient” constitute  
9 grounds for initiating discipline against a licensee.

10 14. Respondent failed to maintain complete medical records relating to the diagnosis,  
11 treatment and care of Patient A, by failing to correctly and completely document his actions when  
12 he treated Patient A, by failing to maintain an accurate and complete operative report and failing  
13 to provide Patient A with accurate and complete discharge instructions that would have provided  
14 adequate guidance for post-operative restrictions or splint usage.

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

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

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

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

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

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

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

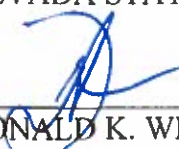
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6. That the Board take such other and further action as may be just and proper in these premises.

DATED this 11th day of July, 2024.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

  
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DONALD K. WHITE  
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*Attorney for the Investigative Committee*

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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 11th day of July, 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*