

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. 24-40767-1

6 **Against:**

FILED

7 **CHAD POOPAT, M.D.,**

FEB 23 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 Chad Poopat, M.D. (Respondent) violated the provisions
14 of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC)
15 Chapter 630 (collectively, the Medical Practice Act), hereby issues its Complaint, stating the IC's
16 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. 14710). Respondent was
19 originally licensed by the Board on February 25, 2013.

20 2. Patient A² was a forty-two (42) year-old female at the time of the events at issue.

21 3. On January 18, 2019, Patient A presented to the emergency room with tachycardia
22 and painful urination. Patient A's clinical presentation was further complicated because she was
23 pregnant during the events in question.

24 4. A urinary analysis of Patient A performed in the emergency room demonstrated a
25 high white blood cell count present in Patient A's urine. A limited ultrasound was then obtained

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

28 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 which was interpreted by a radiologist who failed to document the existence of a 1.11cm kidney
2 stone and hydronephrosis (swelling of the kidney).

3 5. Patient A subsequently underwent a renal ultrasound performed on January 19,
4 2019, which was interpreted by the Respondent who documented a finding of bilateral
5 nephrolithiasis with an obstructed calyx at the right uteropelvic junction. Respondent failed to
6 compare the previous limited ultrasound to the subsequent January 19, 2019, however, which
7 demonstrated concerning new findings in comparison to the prior ultrasound.

8 **COUNT I**

9 **NRS 630.301(4) - Malpractice**

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

12 7. NRS 630.301(4) provides that malpractice of a physician is grounds for initiating
13 disciplinary action against a licensee.

14 8. NAC 630.040 defines malpractice as “the failure of a physician, in treating a
15 patient, to use the reasonable care, skill, or knowledge ordinarily used under similar
16 circumstances.”

17 9. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed
18 to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when
19 rendering medical services to Patient A by failing to appropriately compare prior ultrasound
20 imaging with the January 19, 2019, ultrasound leading to further delay in Patient A’s treatment.

21 10. By reason of the foregoing, Respondent is subject to discipline by the Board as
22 provided in NRS 630.352.

23 **COUNT II**

24 **NRS 630.3062(1)(a) - Failure to Maintain Complete Medical Records**

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

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

4 13. Respondent failed to maintain complete medical records relating to the diagnosis,
5 treatment and care of Patient A, by failing to correctly interpret and document relevant CT
6 findings in Patient A’s radiology report from prior ultrasound studies.

7 14. 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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OFFICE OF THE GENERAL COUNSEL

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


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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 23rd day of February, 2024.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:



IAN J. CUMINGS
Senior Deputy General Counsel
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Reno, NV 89521
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Email: icumings@medboard.nv.gov
Attorney for the Investigative Committee

1 VERIFICATION

2 STATE OF NEVADA)
3) : ss.
4 COUNTY OF WASHOE)

5 Bret W. Frey, M.D., having been duly sworn, hereby deposes and states under penalty of
6 perjury that he is the Chairman of the Investigative Committee of the Nevada State Board of
7 Medical Examiners that authorized the Complaint against the Respondent herein; that he has read
8 the foregoing Complaint; and that based upon information discovered in the course of the
9 investigation into a complaint against Respondent, he believes that the allegations and charges in
10 the foregoing Complaint against Respondent are true, accurate and correct.

11 DATED this 23rd day of February, 2024.

12 INVESTIGATIVE COMMITTEE OF THE
13 NEVADA STATE BOARD OF MEDICAL EXAMINERS

14 By:

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17 BRET W. FREY, M.D.

18 *Chairman of the Investigative Committee*