

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. 24-53587-3

6 **Against:**

FILED

7 **HISBAY HAIDER ALI, M.D.,**

OCT 11 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 Hisbay Haider Ali, 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. 20660). Respondent was
19 originally licensed by the Board on December 31, 2020. Respondent's specialty is listed as
20 psychiatry on the Board's website.

21 2. On or about December 18, 2022, Respondent was arrested for domestic violence
22 following an altercation with a romantic partner.

23 3. Respondent renewed his medical license on or about June 27, 2023, without critical
24 disclosure of his criminal history.

25 4. Respondent answered "no" on his renewal application to the question of whether
26 Respondent had ever been arrested, investigated, or pled guilty or nolo contendere to any offense
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28 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., Col. Eric D. Wade,
USAF (Ret.), and Hugh L. Bassewitz, M.D., FAAOS.

1 or violation of any federal law (including the Uniform Code of Military Justice), state or local law,
2 or the laws of any foreign country which is a misdemeanor, gross misdemeanor, felony, violation
3 of the Uniform Code of Military Justice, or synonymous thereto in a foreign jurisdiction,
4 excluding any minor traffic offense (driving or being in control of a motor vehicle while under the
5 influence of a chemical substance, including alcohol is not considered a minor traffic offense), or
6 for any offense which is related to the manufacture, distribution, prescribing, or dispensing of
7 controlled substances.

8 5. On or about April 6, 2024, Respondent was arrested for driving under the influence
9 of alcohol (DUI). Respondent was involved in a single-person vehicle accident while driving at a
10 high rate of speed after colliding with a curb causing the vehicle to roll over. Respondent had a
11 blood alcohol volume of .273 grams per milliliter at the time of his arrest.

12 6. Respondent failed to report his arrest to the Board within thirty (30) days as
13 required by NRS 630.306(1)(I).

14 COUNT I

15 **NRS 630.304(1) - Dishonesty in Renewing a License**

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

18 8. NRS 630.304(1) provides that renewing a license to practice medicine by fraud or
19 misrepresentation or by any false, misleading, inaccurate or incomplete statement is grounds for
20 initiating disciplinary action or denying licensure.

21 9. Respondent renewed his license to practice medicine by fraud and
22 misrepresentation through a false, misleading, inaccurate and incomplete statement when he
23 answered "NO" to the following question and submitted his Nevada medical license renewal
24 application on June 21, 2023:

25 "Have you been investigated for, charged with, convicted of, or
26 pled guilty or nolo contendere to [any offense of federal, state or
27 local law] . . . which is a misdemeanor . . ., excluding any minor
28 traffic offense (driving or being in control of a motor vehicle while
under the influence of a chemical substance, including alcohol, is
not considered a minor traffic offense) . . .? **Please note that you
MUST disclose ANY investigation or arrest, including those
where the final disposition was dismissal, or expungement.**"

1 10. 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 630.306(1)(I) - Failure to Report Criminal Action or Conviction**

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

7 12. NRS 630.306(1)(I) provides that the failure by a licensee to report in writing,
8 within thirty (30) days, any criminal action taken or conviction obtained against the licensee, other
9 than a minor traffic violation, in this State or any other state, or by the Federal Government, a
10 branch of the Armed Forces of the United States or any local or federal jurisdiction of a foreign
11 country is grounds for initiating disciplinary action against a licensee or denying licensure.

12 13. Respondent did not report in writing to the Board within thirty (30) days of his
13 December 18, 2022, domestic violence arrest.

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

16 **COUNT III**

17 **NRS 630.306(1)(I) - Failure to Report Criminal Action or Conviction**

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

20 16. NRS 630.306(1)(I) provides that the failure by a licensee to report in writing,
21 within thirty (30) days, any criminal action taken or conviction obtained against the licensee, other
22 than a minor traffic violation, in this State or any other state, or by the Federal Government, a
23 branch of the Armed Forces of the United States or any local or federal jurisdiction of a foreign
24 country is grounds for initiating disciplinary action or denying licensure.

25 17. Respondent did not report in writing to the Board within thirty (30) days of his
26 April 6, 2024, DUI arrest.

27 18. By reason of the foregoing, Respondent is subject to discipline by the Board as
28 provided in NRS 630.352.

COUNT IV

NRS 630.301(9) - Disreputable Conduct

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

20. NRS 630.301(9) provides that engaging in conduct that brings the medical profession into disrepute is grounds for initiating disciplinary action or denying licensure.

21. Respondent engaged in conduct that brings the medical profession into disrepute by excessively drinking alcohol and operating a motor vehicle under the influence of alcohol, resulting in a single-person vehicle accident and committing an act of violence against a romantic partner.

22. 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
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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 October, 2024.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: _____


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Attorney for the Investigative Committee

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VERIFICATION

STATE OF NEVADA)
 : ss.
COUNTY OF WASHOE)

Bret W. Frey, 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 11th day of October, 2024.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

BRET W. FREY, M.D.
Chairman of the Investigative Committee