

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. 24-25391-1

6 **Against:**

7 **SAVITA M. CHANDER, M.D.,**

8 **Respondent.**

FILED

JUL 24 2024

**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 Savita M. Chander, 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. 12012). Respondent was
19 originally licensed by the Board on August 23, 2006.

20 2. Patient A² was a seventy-five (75) year-old male at the time of the events at issue.

21 3. Patient A had relevant medical history of prostate cancer with metastasis to his
22 spine, causing spinal fractures.

23 4. On December 20, 2019, Patient A underwent a decompressive laminectomy of his
24 spine at the L4 and the T6-T7 levels.

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27 ¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time this formal
28 Complaint was authorized for filing, was composed of Board members Bret W. Frey, M.D., Col. Eric D. Wade,
USAF (Ret.), and Carl N. Williams, Jr., M.D.

² Patient A's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

1 14. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed
2 to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when
3 rendering medical services to Patient A by failing to appropriately examine Patient A to rule out
4 sepsis or send Patient A to the emergency room, despite Patient A's persistent fever and high-risk
5 clinical presentation following a complex surgery.

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

8 **COUNT II**

9 **NRS 630.306(1)(b)(2) - Violation of Standards of Practice Established by Regulation -**
10 **Failure to Consult**

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

13 17. Violation of a standard of practice adopted by the Board is grounds for disciplinary
14 action pursuant to NRS 630.306(1)(b)(2).

15 18. NAC 630.210 requires a physician to "seek consultation with another provider of
16 health care in doubtful or difficult cases whenever it appears that consultation may enhance the
17 quality of medical services."

18 19. Respondent failed to seek consultation in a timely manner with regard to Patient
19 A's serious medical presentation on December 24, 2019. Respondent should have consulted with
20 an appropriate care provider to address the doubtfulness of the diagnosis of Patient A's medical
21 condition. A timely consultation would have confirmed or denied such a diagnosis and may have
22 enhanced the quality of medical care provided to Patient A with regard to the detection of his
23 sepsis diagnosis.

24 20. By reason of the foregoing, Respondent is subject to discipline by the Nevada State
25 Board of Medical Examiners as provided in NRS 630.352.

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

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

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

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

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

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

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

15 DATED this 24th day of July, 2024.

16 INVESTIGATIVE COMMITTEE OF THE
17 NEVADA STATE BOARD OF MEDICAL EXAMINERS

18 By: _____

19 IAN J. CUMINGS
20 Senior Deputy General Counsel
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23 Tel: (775) 688-2559
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25 *Attorney for the Investigative Committee*

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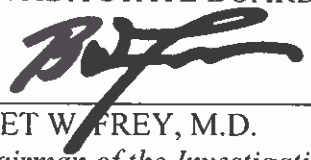
VERIFICATION

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 24th day of July, 2024.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

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