

For Public

**BEFORE THE BOARD OF MEDICAL EXAMINERS
OF THE STATE OF NEVADA**

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**In The Matter of Charges and
Complaint Against
RONALD H. FOOTE, M.D.,
Respondent.**

NO. Case No. 08-12899-1

FILED *to February 2008*

[Signature]
EXECUTIVE DIRECTOR

COMPLAINT

The Investigative Committee of the Board of Medical Examiners of the State of Nevada (Board), composed of Charles N. Held, M.D. and Cindy Lamerson, M.D., and Ms. Jean Stoess, M.A., by and through Edward O. Cousineau, Deputy General Counsel for the Board, having a reasonable basis to believe that Ronald H. Foote, M.D., hereinafter referred to as "Respondent," has violated the provisions of NRS Chapter 630, hereby issues its formal Complaint, stating the Investigative Committee's charges and allegations, as follows:

1. Respondent is licensed in active status to practice medicine in the State of Nevada, and was so licensed by the Board, pursuant to the provisions of Chapter 630 of the Nevada Revised Statutes, on December 4, 1999.

2. Respondent initially applied for medical licensure with the Board in July of 1999. As part of the application process, Respondent was asked on the Application for Licensure, "[h]ave you ever been investigated for, charged with, convicted of, or plead guilty or nolo contendere to any offense or violation of any federal, state or local law, including any foreign country, which is a misdemeanor, gross misdemeanor, or felony, excluding any minor traffic offense..." Respondent answered in the negative.

3. In June of 2001, Respondent provided to the Board an Application for Registration Renewal for the 2001-2003 licensure biennium. Respondent was again asked "[h]ave you ever been

1 investigated for, charged with, convicted of, or plead guilty or nolo contendere to any offense or
2 violation of any federal, state or local law, including any foreign country, which is a misdemeanor, gross
3 misdemeanor, or felony, excluding any minor traffic offense..." Respondent answered in the
4 affirmative and provided documentation indicating that he had been charged with Driving Under the
5 Influence (DUI) in May of 2000, and that the charge was dismissed thereafter.

6 4. In June of 2003, Respondent provided to the Board an Application for Registration
7 Renewal for the 2003-2005 licensure biennium. Respondent was once again asked "[h]ave you ever
8 been investigated for, charged with, convicted of, or plead guilty or nolo contendere to any offense or
9 violation of any federal, state or local law, including any foreign country, which is a misdemeanor, gross
10 misdemeanor, or felony, excluding any minor traffic offense..." Respondent answered in the negative.

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12 5. In May of 2005, Respondent provided to the Board an Application for Registration
13 Renewal for the 2005-2007 licensure biennium. Respondent was once again asked "[h]ave you ever
14 been investigated for, charged with, convicted of, or plead guilty or nolo contendere to any offense or
15 violation of any federal, state or local law, including any foreign country, which is a misdemeanor, gross
16 misdemeanor, or felony, excluding any minor traffic offense..." Respondent answered in the positive
17 and indicated "see enclosed." However, the enclosed materials included with the application did not
18 address the positive response.

19 6. A Federal Bureau of Investigations criminal background check conducted by the Board
20 revealed that Respondent was arrested in August of 1984 for assault. Additionally, the background
21 check revealed that in May of 1996, Respondent was arrested for burglary and battery. Lastly, the
22 background check revealed that in December of 2000, Respondent was arrested for obstructing a peace
23 officer and DUI.

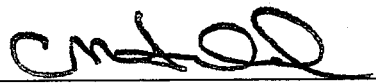
24 7. Respondent failed to report to the Board any of the arrests referenced in paragraph 6 at any
25 time during the initial application or renewal of licensure process. Section 630.304(1) of the Nevada
26 Revised Statutes provides that obtaining, maintaining or renewing or attempting to obtain, maintain or
27 renew a license to practice medicine by bribery, fraud or misrepresentation or by any false, misleading,
28 inaccurate or incomplete statement is grounds for disciplinary action.

VERIFICATION

STATE OF NEVADA)
 : ss.
COUNTY OF DOUGLAS)

Charles N. Held, 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 6th day of February, 2008.



Charles N. Held, M.D.

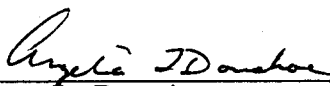
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1 **CERTIFICATE OF MAILING**

2 I hereby certify that I am employed by Nevada State Board of Medical Examiners and
3 that on the 6TH day of February 2008, I served a file copy of the COMPLAINT, NOTICE OF
4 PRE-HEARING CONFERENCE & HEARING, along with appointment letter, by mailing via
5 USPS certified return receipt mail to the following:

6 Ronald H. Foote, M.D.
7 2320 Paseo Del Prado, Bldg. B #207
8 Las Vegas, NV 89102

9 Dated this 6th day of February 2008.

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12 _____
13 Angelia Donohoe
14 Legal Assistant
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