

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

3 \* \* \* \* \*

4 **In The Matter of Charges and** )  
5 )  
6 **Complaint Against** )  
7 )  
8 **GRAHAM DUNDAS SIMPSON, M.D.,** )  
9 )  
10 **Respondent.** )

Case No. 11-5013-1

**FILED**

**MAY - 4 2011**

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS  
By: 

11 **COMPLAINT**

12 The Investigative Committee of the Nevada State Board of Medical Examiners, composed at  
13 the time filing of Charles N. Held, M.D., Chairman, Theodore B. Berndt, M.D., Member, and  
14 Valerie J. Clark, BSN, RHU, LUTCF, Member, having a reasonable basis to believe that  
15 Graham Dundas Simpson, M.D., hereinafter referred to as Respondent, has violated the provisions  
16 of NRS Chapter 630, hereby issues its formal Complaint, stating the Investigative Committee's  
17 charges and allegations, as follows:

18 1. Respondent's license is currently in active status (License No. 3723), and has been so  
19 licensed since January 1, 1979 by the Nevada State Board of Medical Examiners pursuant to the  
20 provisions of Chapter 630 of the Nevada Revised Statutes.

21 2. Patient A was a fifty-nine year old (59) male at the time of the incidents in question.  
22 His true identity is not disclosed to protect his privacy, but his identity is disclosed in the Patient  
23 Designation served on Respondent along with a copy of this Complaint.

24 3. On August 21, 2008, Patient A presented to Cenegenics Medical Institute and the  
25 Respondent primarily for weight loss. During the initial work-up, Patient A admitted to being  
26 addicted to pain medications. He admitted to taking Oxycontin, 80 mg 3 tablets 3X per day, and  
27 Percocet, 30 mg 8-12 tablets per day. He also told Respondent that he was taking methimazole for a  
28 thyroid condition.



1           12.    By reason of the foregoing, Respondent is subject to discipline by the Nevada State  
2 Board of Medical Examiners as provided in Section 630.352 of the Nevada Revised Statutes.

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

4           1.    That the Nevada State Board of Medical Examiners give Respondent notice of the  
5 charges herein against him and give him notice that he may file an answer to the Complaint herein  
6 as set forth in Section 630.339 of the Nevada Revised Statutes within twenty (20) days of service of  
7 the Complaint.

8           2.    That the Nevada State Board of Medical Examiners set a time and place for a formal  
9 hearing after holding an Early Case Conference pursuant to NRS 630.339(3);

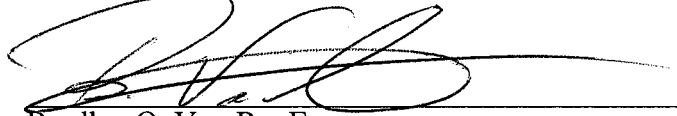
10          3.    That the Nevada State Board of Medical Examiners determine what sanctions it  
11 determines to impose if it determines there has been a violation or violations of the Medical Practice  
12 Act (Nevada Revised Statutes Chapter 630) committed by Respondent; and

13          4.    That the Nevada State Board of Medical Examiners make, issue and serve on  
14 Respondent its findings of facts, conclusions of law and order, in writing, that includes the sanctions  
15 imposed; and

16          5.    That the Nevada State Board of Medical Examiners take such other and further action  
17 as may be just and proper in these premises.

18          DATED this 4<sup>th</sup> day of May, 2011.

19  
20                                   THE INVESTIGATIVE COMMITTEE OF THE  
21                                   NEVADA STATE BOARD OF MEDICAL EXAMINERS

22                                   By:   
23                                   Bradley O. Van Ry, Esq.  
24                                   Attorney for the Investigative Committee

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VERIFICATION

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STATE OF NEVADA            )  
  : ss.  
COUNTY OF DOUGLAS        )

Charles N. Held, M.D., hereby deposes and states under penalty of perjury under the laws of the state of Nevada that he is the Chairman of the Investigative Committee of the Nevada State Board of Medical Examiners that authorized the foregoing Complaint against the Respondent herein; that he has read the foregoing Complaint; and that based upon information discovered during the course of the investigation into a complaint against Respondent, that he believes the allegations and charges in the foregoing Complaint against Respondent are true, accurate, and correct.

Dated this 4<sup>th</sup> day of May, 2011.

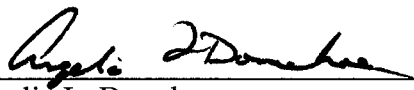
  
\_\_\_\_\_  
CHARLES N. HELD, M.D.

**CERTIFICATE OF MAILING**

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 5<sup>th</sup> day of May 2011, I served a file copy of the COMPLAINT, PATIENT DESIGNATION & Fingerprint Information, by mailing via USPS certified return receipt mail to the following:

Graham Simpson, M.D.  
5060 Meadowood Mall Circle  
Reno, NV 89511

Dated this 5<sup>th</sup> day of May 2011.



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Angelia L. Donohoe  
Legal Assistant

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