

OFFICE OF THE GENERAL COUNSEL  
Nevada State Board of Medical Examiners  
1105 Terminal Way #301  
Reno, Nevada 89502  
(775) 688-2559

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

\* \* \* \* \*

**In the Matter of Charges and** )  
 )  
**Complaint Against** )  
 )  
**DOUGLAS J. SEIP, M.D.,** )  
 )  
**Respondent** )

Case No. 13-6513-1

**FILED**

**MAY 13 2013**

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS  
By: 

**COMPLAINT**

The Investigative Committee (IC) of the Nevada State Board of Medical Examiners (Board), composed at the time of filing of Theodore B. Berndt, M.D., Chairman, Valerie J. Clark, BSN, RHU, LUTCF, Member, and Michael J. Fischer, M.D., Member, by and through Erin L. Albright, Esq., Deputy General Counsel and attorney for the IC, having a reasonable basis to believe that Douglas J. Seip, M.D. (Respondent), violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical Practice Act), hereby issues its formal Complaint, stating the IC's charges and allegations as follows:

1. Respondent is currently licensed in active status (License No. 4420), and has been so licensed by the Board since October 3, 1981, pursuant to the provisions of the Medical Practice Act.

2. Patient A was a thirty-two (32)-year-old male at the time of the incidents in question. His true identity is not disclosed in this Complaint to protect his identity, but his identity is disclosed in the Patient Designation contemporaneously served on Respondent with this Complaint.

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COUNT II

**(Malpractice)**

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

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

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

9 15. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed  
10 to use reasonable care, skill or knowledge ordinarily used under similar circumstances when  
11 treating Patient A.

12 16. By reason of the foregoing, Respondent is subject to discipline by the Board as  
13 provided in NRS 630.352.

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

15 1. That the Board give Respondent notice of the charges herein against him and give  
16 him notice that he may file an answer to the Complaint herein as set forth in NRS 630.339(2)  
17 within twenty (20) days of service of the Complaint;

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

20 3. That the Board determine the sanctions it will impose if it finds Respondent  
21 violated the Medical Practice Act;

22 4. That the Board make, issue and serve on Respondent, in writing, its findings of  
23 fact, conclusions of law and order, which shall include the sanctions imposed; and

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

DATED this 10<sup>th</sup> day of May, 2013.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:   
Erin L. Albright, Esq.  
Deputy General Counsel  
Attorney for the Investigative Committee

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VERIFICATION

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STATE OF NEVADA        )  
                                  : ss.  
COUNTY OF WASHOE    )

Theodore B. Berndt, 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, he believes the allegations and charges in the foregoing Complaint against Respondent are true, accurate and correct.

Dated this 10<sup>th</sup> day of May, 2013.

Theodore B. Berndt  
Theodore B. Berndt, M.D.

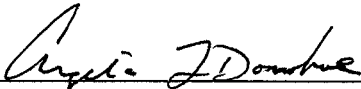
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**CERTIFICATE OF MAILING**

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 13<sup>th</sup> day of May 2013; I served a filed copy of the COMPLAINT, PATIENT DESIGNATION & FINGERPRINT INFORMATION, via USPS certified return receipt mail to the following:

Douglas Seip, M.D.  
1350 East Flamingo Rd., #3330  
Las Vegas, NV 89119

Dated this 13<sup>th</sup> day of May, 2013.

  
\_\_\_\_\_  
Angelia L. Donohoe  
Legal Assistant