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

\* \* \* \* \*

**In the Matter of Charges and** )  
 )  
**Complaint Against** )  
 )  
**ALOK C. SAXENA, M.D.,** )  
 )  
**Respondent.** )

Case No. 15-7858-1

**FILED**

SEP 29 2015

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS  
By: 

**COMPLAINT**

The Investigative Committee (IC) of the Nevada State Board of Medical Examiners (Board), by and through Erin L. Albright, Esq., Board General Counsel and attorney for the IC, having a reasonable basis to believe that Alok C. Saxena, M.D. (Respondent), has 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. 6690), and has been licensed by the Board since March 6, 1993, pursuant to the provisions of the Medical Practice Act.
2. On July 7, 2015, Respondent was served with an Order from the IC. The Order required Respondent to provide a written response detailing his knowledge of, and interactions with, the individual known to him as Jean Pierre Petrel, a.k.a. J.P., to include information concerning Dr. Samir Saxena and his involvement with J.P. within five calendar days of the date of service of the Order. (See a true and correct copy of the Order, attached hereto as Exhibit "1.")
3. Respondent failed to respond to the Board's Order within five calendar days of the date of service of the Order.

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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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4. NRS 630.3065(2)(a) provides that willful failure to comply with an order issued by the IC is grounds for disciplinary action against a licensee.

5. Respondent violated NRS 630.3065(2)(a) when he willfully failed to comply with the IC's July 7, 2015 Order.

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

**WHEREFORE**, the IC 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 it agrees upon to impose if it finds and concludes that there has been a violation or violations of the Medical Practice Act committed by Respondent; and

4. 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

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

DATED this 29<sup>th</sup> day of September, 2015.

THE INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

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

VERIFICATION

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 29<sup>th</sup> day of September, 2015.

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

OFFICE OF THE GENERAL COUNSEL  
Nevada State Board of Medical Examiners  
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Reno, Nevada 89502  
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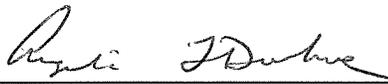
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**CERTIFICATE OF MAILING**

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 29<sup>th</sup> day of September 2015; I served a file stamp copy of COMPLAINT w/exhibits and FINGERPRINT INFORMATION via USPS e-certified return receipt mail to the following:

Alok C. Saxena, M.D.  
PO Box 35949  
Las Vegas, NV 89133

Dated this 29<sup>th</sup> day of September, 2015.



---

Angelia L. Donohoe  
Legal Assistant

**EXHIBIT “1”**

**EXHIBIT “1”**



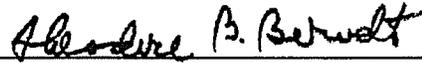
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Accordingly, it is hereby **ORDERED** that:

You shall provide a written response to the specific requests contained in the letters provided to you, copies of which are attached to this order, to the Nevada State Board of Medical Examiners, Investigative Division within five (5) calendar days of the date of service of this Order upon you or your representative.

**You are further advised that pursuant to NRS 630.3065(2)(a), willful failure to comply with an order of the Board or a committee designated by the Board to investigate a complaint against a physician is grounds for initiating disciplinary action against a physician. Accordingly, failure to comply with the instant Order in the time indicated above is grounds for initiating disciplinary action against you.**

Dated this 7<sup>th</sup> day of July, 2015.

  
\_\_\_\_\_  
Theodore Berndt, M.D., Chairman  
Investigative Committee of the Nevada State Board  
of Medical Examiners