BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

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In the Matter of Charges and Complaint Against SIDNEY FRANK, M.D., Respondent.

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NO. Case No. 08-8527-1
FILED 15 APR Davs
Juna A. Clah
EXECUTIVE DIRECTOR

For Public

COMPLAINT

The Investigative Committee of the Nevada State Board of Medical Examiners (Board), composed of Sohail U. Anjum, M.D., Chariman, and S. Daniel McBride, M.D., Member, by and through Edward O. Cousineau, Deputy General Counsel for the IC, having a reasonable basis to believe that Sidney Frank, 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:

Respondent was granted a license to practice medicine in the state of Nevada on
 December 2, 1989, and was so licensed by the Nevada State Board of Medical Examiners, pursuant to
 the provisions of Chapter 630 of the Nevada Revised Statutes up until July 1, 2007, when Respondent
 requested that his licensure status be changed to inactive status, which it currently remains.

Respondent was granted a license to practice medicine in the state of California on or
 about October 27, 1972. On March 1, 2007, the state of California filed a one-count Accusation against
 Respondent alleging gross negligence on the part of Respondent, in his care and treatment of multiple
 patients.

3. Thereafter, on August 30, 2007, the state of California entered an Order revoking
Respondent's license to practice medicine, however, that revocation was stayed, and Respondent was
placed on probation with various conditions for a period of five years beginning on August 30, 2007.

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1	4.	Section 630.301(3) of the Nevada Revised Statutes provides that the suspension,	
2	modificatio	on or limitation of the license to practice any type of medicine by any other jurisdiction is	
3	grounds for	disciplinary action.	
4	5.	The stayed revocation of Respondent's license to practice medicine in the state of	
5	California,	constitute violations of the provisions of NRS 630.301(3).	
6	6.	Based upon the forgoing, Respondent has violated Nevada Revised Statute 630.301(3),	
7	and is subject to discipline by the Nevada State Board of Medical Examiners as provided in Nevada		
8	Revised Statute 630.352.		
9	WH	EREFORE, the Investigative Committee prays:	
10	1.	That the Board fix a time and place for a formal hearing;	
11	2.	That the Board give Respondent notice of the charges herein against him, the time and place	
12	set for the h	earing, and the possible sanctions against him;	
13	3.	That the Board determine what sanctions it determines to impose for the violation or	
14	violations co	ommitted by Respondent; and	
15	4.	That the Board make, issue and serve on Respondent its findings of facts, conclusions of	
16		er, in writing, that includes the sanctions imposed.	
17	DA7	TED this day of April, 2008.	
18		INVESTIGATIVE COMMITTEE OF	
19		THE NEVADA STATE BOARD OF MEDICAL EXAMINERS	
20		STID .	
21		By: <u>Edward O. Cousineau</u>	
22		Attorney for the Investigative Committee of the Nevada State Board of Medical Examiners	
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VERIFICATION

STATE OF NEVADA COUNTY OF CLARK

Sohail U. Anjum, 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 25^{44} day of April, 2008.

: ss.

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Sohail U. Anjum, M.D.

1	CERTIFICATE OF MAILING		
2	I hereby certify that I am employed by Nevada State Board of Medical Examiners and		
3	that on the 25 th day of April 2008, I served a file copy of the COMPLAINT, NOTICE OF PRE-		
4	HEARING CONFERENCE & HEARING, SETTLEMENT, WAIVER & CONSENT		
5	AGREEMENT, & along with appointment letter, by mailing via USPS certified return receipt		
6	mail to the following:		
7	Sidney Frank, M.D. 5514 W. Sweet Dr.		
8	Visalia, CA 93291		
9	Dated this 25 th day of April 2008.		
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12	Angelia Donohoe		
13	Angelia Donohoe Legal Assistant		
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