(775) 688-2559

BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * * *

In the Matter of Charges and)
In the Watter of Charges and) Case No. 10-12158-1
Complaint Against) FILED
ABDUL-SAMI SIDDIQUI, M.D.,	OCT 2 1 2010
Respondent.	NEVADA STATE BOARD OF MEDICAL EXAMINERS By:

COMPLAINT

The Investigative Committee of the Nevada State Board of Medical Examiners (Board), composed of Charles N. Held, M.D., Chairman, Theodore B. Berndt, M.D., Member, and Valerie J. Clark, BSN, RHU, LUTCF, Member, at the time of the authorization of filing this formal complaint, by and through Edward O. Cousineau, Deputy Executive Director for the Board and counsel for the Investigative Committee, having a reasonable basis to believe that Abdul-Sami Siddiqui, M.D., hereinafter referred to as "Respondent," has violated the provisions of Nevada Revised Statutes (NRS) Chapter 630, hereby issues its formal Complaint, stating the Investigative Committee's charges and allegations, as follows:

- 1. Respondent license to practice medicine is currently active, and at all times alleged herein, Respondent was licensed by the Board, pursuant to the provisions of Chapter 630 of the NRS.
- 2. In November of 2009, Respondent accepted the entry of an order by the Texas Medical Board which imposed an administrative penalty against him in the amount of \$4,000.00. The administrative penalty was based upon Respondent's submission of false or misleading statement on two applications for licensure in the state of Texas, more specifically, Respondent's failure to report an arrest for domestic battery which occurred in 1996. (See Exhibit 1)

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3.	Respondent	failed to	subsequently	notice t	the Board	of the	agreed	violation	of
Texas law and	d the associate	ed admin	strative penalt	y impose	d against h	im.			

- 4. Section 630.301(3) of the NRS provides that any disciplinary action, including without limitation, the revocation, suspension, modification or limitation of the license to practice any type of medicine by any other jurisdiction is grounds for disciplinary action.
- The disciplinary action related to Respondent's license to practice medicine in the state of Texas, constitutes a violation of NRS 630.301(3).
- 6. Section 630.306(11) of the NRS provides that the failure by a licensee to report in writing, within 30 days, any disciplinary action taken against the licensee by another state, is grounds for disciplinary action.
- 7. The failure of Respondent to report to the Board the disciplinary action, in the state of Texas, constitutes a violation of NRS 630.306(11).
- 8. Based upon the forgoing, Respondent has violated NRS 630.301(3) and NRS 630.306(11), and is subject to discipline by the Board as provided NRS 630.352.

WHEREFORE, the Investigative Committee prays:

- That the Board fix a time and place for a formal hearing; 1.
- 2. That the Board give Respondent notice of the charges herein against him, the time and place set for the hearing, and the possible sanctions against him;
- 3. That the Board determine what sanctions it determines to impose for the violation or violations committed by Respondent; and
- 4. That the Board make, issue and serve on Respondent its findings of facts, conclusions of law and order, in writing, that includes the sanctions imposed.

DATED this 21 day of October, 2010.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: Edward O. Cousineau

Attorney for the Investigative Committee of the Nevada State Board of Medical Examiners

VERIFICATION

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STATE OF NEVADA ()
COUNTY OF DOUGLAS	SS.

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 21 ⁸⁷ day of October, 2010.

Charles N. Held, M.D.

EXHIBIT 1

ORDER IMPOSING ADMINISTRATIVE PENALTY

ABDUL SIDDIQUI, M.D.	Applicant for
	Texas Medical License

The Texas Medical Board (TMB) has determined that Abdul Siddiqui, M.D. ("the Respondent") is in violation of Texas Occupations Code §164.052(a)(1), based on the submission of a false or misleading statement in two applications for full licensure regarding his failure to report his 1996 arrest for domestic battery that was subsequently dismissed with no action taken. TMB hereby grants Respondent's application for a license and imposes an administrative penalty for this violation, as authorized by Section 165.001, Texas Occupations Code and Board rules §§187.75-82.

The amount of the imposed penalty is \$4,000.00. Payment of this penalty is due no later than 60 days after the Respondent receives notice of this Order. The administrative penalty shall be paid in a single payment by cashier's check or money order payable to the Texas Medical Board and shall be submitted to the Executive Director of the Board for routing so as to be remitted to the Comptroller of Texas for deposit in the general revenue fund. Respondent's failure to pay the administrative penalty as ordered shall constitute grounds for further disciplinary action by the Board, and may result in a referral by the Executive Director of the Board for collection by the Office of the Attorney General.

RESPONDENT WAIVES ANY FURTHER HEARINGS OR APPEALS TO THE BOARD OR TO ANY COURT IN REGARD TO ALL TERMS AND CONDITIONS OF THIS AGREED ORDER. RESPONDENT AGREES THAT THIS IS A FINAL ORDER.

THIS ORDER IS A PUBLIC RECORD. I, ABDUL SIDDIQUI, M.D., HAVE READ AND UNDERSTAND THIS AGREED ORDER. I UNDERSTAND THAT BY SIGNING, I WAIVE CERTAIN RIGHTS. I SIGN IT VOLUNTARILY. I UNDERSTAND THIS AGREED ORDER CONTAINS THE ENTIRE AGREEMENT AND THERE IS NO OTHER AGREEMENT OF ANY KIND, VERBAL, WRITTEN OR OTHERWISE.

ABDULLSHOP LOUI, M.D.

Respondent

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners

CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 21st day of October 2010; I served a file copy of the COMPLAINT, Original Settlement, Waiver and Consent Agreement along with Fingerprint Information, by mailing via USPS certified mail to the following:

Abdul-Sami Siddiqui, M.D. P.O. Box 363159 North Las Vegas, NV 89036

Dated this 21st day of October 2010.

Angelia L. Donohoe Legal Assistant