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

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4 In The Matter of Charges and Case No. 11-9612-1 ) 5 ) **Complaint Against** 6 FILED 7 NANCY LYNNE LONG, M.D., FEB - 1 2011 8 NEVADA STATE BOARD OF **Respondent.** 9

## **COMPLAINT**

12 The Investigative Committee of the Nevada State Board of Medical Examiners, comprised of Charles N. Held, M.D., Chairman, Theodore B. Berndt, M.D., Member, and Valerie J. Clark, 13 14 Member, at the time it approved and authorized the filing of this complaint having a reasonable basis to believe that Nancy Lynne Long, M.D., hereinafter referred to as Respondent, has violated 15 the provisions of NRS Chapter 630, hereby issues its formal Complaint, stating the Investigative 16 Committee's charges and allegations, as follows:

Respondent's license is currently in active status (License No. 5916), and has been 18 1. 19 so licensed since September 16, 1989 by the Nevada State Board of Medical Examiners pursuant 20 to the provisions of Chapter 630 of the Nevada Revised Statutes.

2. Patient A was an eighteen year old (18) female at the time of the incidents in 21 22 question. Her true identity is not disclosed to protect her privacy, but her identity is disclosed in the 23 Patient Designation served on Respondent along with a copy of this Complaint.

24 3. On or about October 21, 2006, Patient A presented to St. Rose Dominican Hospital with a headache and lower abdominal pain. She was 30.3 weeks pregnant and obese. 25

4. 26 Patient A was examined by the nursing staff. Her blood pressure was 143/99. She 27 had a pulse of 101 and multiple abnormal results from the urinalysis. She had protein, blood and ketones in her urine. 28

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5. Patient A remained in the hospital for almost three (3) hours. During that time, 2 Patient A exhibited five (5) questionable blood pressure measurements. The nurse found that Patient A had a closed cervix and normal fetal heart rate without contractions. 3

6. Respondent was informed of these vitals and the physical assessment by the nursing staff. Patient A was then discharged without ever seeing, or being examined by, Respondent.

7. About thirty (30) hours later, Patient A presented to the hospital again with the same complaints of headaches, abdominal pain. She also complained of decreased fetal movement. Patient A was ultimately diagnosed with Preeclampsia, and the infant was born and pronounced dead the next day.

### **Count I**

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

Nevada Administrative Code Section 630.040 defines malpractice as the failure of 9. a physician, in treating a patient, to use the reasonable care, skill, or knowledge ordinarily used under similar circumstances.

17 10. Nevada Revised Statute Section 630.301(4) provides that malpractice is grounds for initiating disciplinary action against a licensee. 18

19 11. Respondent failed to use the reasonable care, skill, or knowledge ordinarily used under the same or similar circumstances when she failed and omitted to personally and fully 20 21 evaluate Patient A; failed to admit Patient A to the hospital; failed to ensure that Patient A was 22 further evaluated; and, failed to obtain an ultrasound of the fetus to assess whether the early onset 23 hypertension had restricted its growth.

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

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**WHEREFORE**, the Investigative Committee prays:

1. 27 That the Nevada State Board of Medical Examiners give Respondent notice of the 28 charges herein against her and give her notice that she may file an answer to the Complaint herein as set forth in Section 630.339 of the Nevada Revised Statutes within twenty (20) days of service
 of the Complaint.

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

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

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

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

DATED this 1 st day of floren , 2011.

THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

Bradley O. Van Ry, Esq. Deputy General Counsel and Attorney for the Investigative Committee

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#### VERIFICATION

## 3 STATE OF NEVADA ): ss. COUNTY OF DOUGLAS ) ss.

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 1st day of February, 2011.

	1	CERTIFICATE OF MAILING
	2	I hereby certify that I am employed by Nevada State Board of Medical Examiners and
	3	that on 1 <sup>st</sup> day of February 2011; I served a file copy of the Complaint, Patient Designation &
	4	Fingerprint Information by mailing via USPS certified return receipt mail to the following:
	5	Nancy Long, M.D.
OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners 1105 Terminal Way #301 Reno, Nevada 89502 (775) 688-2559	6	2610 W. Horizon Ridge Parkway, #105 Henderson, NV 89052
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	8	Dated this 1 <sup>st</sup> day of February 2011.
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	10	Ungli Danshee
	11	Angelia L. Donohoe       Legal Assistant
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