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

* * * * *

In the Matter of Charges and)
)
Complaint Against)
)
ROGER GEE JOE, M.D.,)
)
Respondent.)

Case No. 13-38154-1

FILED

JAN - 9 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 this Complaint of Theodore B. Berndt, M.D., Chairman, Valerie J. Clark, BSN, RHU, LUTCF, Member, and Michael J. Fischer, M.D., Member, by and through Bradley O. Van Ry, Esq., General Counsel for the Board and Attorney for the IC, having a reasonable basis to believe that Roger Gee Joe, M.D. (Respondent), violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 (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. 13756), and has been licensed by the Board since November 15, 2010, pursuant to the provisions of the Medical Practice Act.
2. Respondent is currently licensed to practice medicine in Nevada, and was so licensed at the time of the incident complained of in this matter in the state of Texas.
3. On August 31, 2012, Respondent was granted a license to practice medicine in the state of Texas. As part of the licensure in Texas, Respondent agreed to an Order Imposing Administrative Penalty based upon the submission of a false or misleading statement regarding his internship training for a Texas medical license. Respondent agreed to pay a penalty of \$2,000.00.

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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);

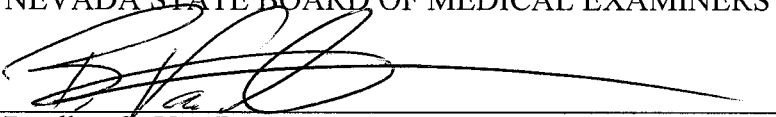
3. That the Board determine the sanctions it will impose if it finds Respondent violated the Medical Practice Act;

4. That the Board make, issue and serve on Respondent, in writing, its findings of fact, conclusions of law and order, which shall include 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 9th day of January, 2013.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 
Bradley O. Van Ry, Esq.
General Counsel
Attorney for the Investigative Committee

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

Dated this 9th day of January, 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 9th day of January 2013; I served a filed copy of the Complaint, Settlement Letter and Fingerprint information via USPS e- certified return receipt mail to the following:

Roger Gee Joe, M.D.
14211 Royal Hill Dr.
Houston, TX 77083

Dated this 9th day of January, 2013.



Angelia L. Donohoe
Legal Assistant