

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

\* \* \* \* \*

**In the Matter of Charges and** )  
)  
**Complaint Against** )  
)  
**HENRY R. LANDSMAN, M.D.,** )  
)  
**Respondent.** )

Case No. 14-5951-1

**FILED**

**JAN 28 2014**

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 the formal 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 Erin L. Albright, Esq., Board General Counsel and attorney for the IC, having a reasonable basis to believe that Henry R. Landsman, 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. 4021), and has been licensed by the Board since March 29, 1980 pursuant to the provisions of the Medical Practice Act.

2. On or about April 13, 1981, the Medical Board of California (California Board) issued Physician's and Surgeon's Certificate No. G44389 to Respondent.

3. On or about December 1, 2011, the California Board revoked Respondent's license to practice medicine in the state of California. The revocation was stayed and Respondent was

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1 placed on probation for five (5) years subject to terms and conditions. Respondent failed to report  
2 this action, in writing, to the Board within thirty (30) days of the order.

3 4. On May 11, 2012, the California Board issued a Citation Order on Respondent  
4 directing him to provide proof of compliance with the terms and conditions of his probation.  
5 Respondent failed to provide proof of compliance with the terms and conditions of his probation.

6 5. On or about September 24, 2012, the California Board issued a Cease Practice  
7 Order to Respondent and suspended his license to practice medicine in the state of California due  
8 to Respondent's failure to provide proof of compliance with the terms and conditions of his  
9 probation. Respondent failed to report this action, in writing, to the Board within thirty (30) days  
10 of the order.

11 6. On May 15, 2013, the California Board revoked Respondent's license to practice  
12 medicine in the state of California due to his failure to provide proof of compliance with the terms  
13 and conditions of his probation. Respondent failed to report this action, in writing, to the Board  
14 within thirty (30) days of the revocation.

15 7. On April 2, 2013, Respondent renewed his license to practice medicine in the state  
16 of Nevada. On this renewal application, Respondent failed to disclose the investigation and/or  
17 formal actions taken against his California medical license by the California Board as required by  
18 law.

19 **Count I**

20 8. All of the allegations in the above paragraphs are hereby incorporated as if fully set  
21 forth herein.

22 9. NRS 630.304(1) provides that obtaining, maintaining or renewing or attempting to  
23 obtain, maintain or renew a license to practice medicine by bribery, fraud or misrepresentation or  
24 by any false, misleading, inaccurate or incomplete statement is grounds for initiating discipline  
25 against a licensee.

26 10. By failing to disclose the investigation and/or formal actions taken against his  
27 California medical license by the California Board on his Nevada medical license renewal  
28 application, Respondent was obtaining, maintaining or renewing or attempting to obtain, maintain

1 or renew his license to practice medicine by fraud, misrepresentation or any false, misleading,  
2 inaccurate or incomplete statement.

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

5 **Count II**

6 12. All of the allegations in the above paragraphs are hereby incorporated as if fully set  
7 forth herein.

8 13. NRS 630.306(2)(a) provides that engaging in any conduct which is intended to  
9 deceive is grounds for initiating discipline against a licensee.

10 14. Respondent's aforementioned activities constitute conduct which was intended to  
11 deceive.

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

14 **Count III**

15 16. All of the allegations in the above paragraphs are hereby incorporated as if fully set  
16 forth herein.

17 17. NRS 630.306(11) provides that failure to report any disciplinary action taken by  
18 another state to the Board within thirty (30) days is grounds for initiating discipline against a  
19 licensee.

20 18. Respondent's failure notify the Board, in writing, within thirty (30) days of the  
21 stayed revocation of Respondent's California medical license by the California Board on  
22 December 1, 2011, the Cease and Desist Order issued by the California Board on  
23 September 24, 2012 and the revocation of Respondent's medical license by the California Board  
24 on May 15, 2013 is a violation of NRS 630.306(11).

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

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Count IV

20. All of the allegations in the above paragraphs are hereby incorporated as if fully set forth herein.

21. NRS 630.301(3) provides that any disciplinary action taken by another state is grounds for initiating discipline against a licensee.

22. The various disciplinary actions taken by the California Board outlined above is grounds for initiating discipline against Respondent.

23. 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 facts 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 28th day of January, 2014.

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

1 STATE OF NEVADA )  
2 : ss.  
3 COUNTY OF WASHOE )  
4

5 Theodore B. Berndt, M.D., hereby deposes and states under penalty of perjury under the  
6 laws of the state of Nevada that he is the Chairman of the Investigative Committee of the Nevada  
7 State Board of Medical Examiners that authorized the foregoing Complaint against the  
8 Respondent herein; that he has read the foregoing Complaint; and that based upon information  
9 discovered during the course of the investigation into a complaint against Respondent, he believes  
10 the allegations and charges in the foregoing Complaint against Respondent are true, accurate, and  
11 correct.

12 Dated this 28<sup>th</sup> day of January, 2014.

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15 Theodore B. Berndt, M.D.  
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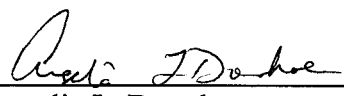
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**CERTIFICATE OF SERVICE**

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 28<sup>th</sup> day of January 2014; I served a filed copy of COMPLAINT & FINGERPRINT INFORMATION, via USPS e-certified mail to the following:

Henry Landsman, M.D.  
10055 Canyon Hills Ave.  
Las Vegas, NV 89148

Dated this 28<sup>th</sup> day of January, 2014.

  
\_\_\_\_\_  
Angelia L. Donohoe  
Legal Assistant