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

\* \* \* \* \*

In the Matter of Charges and

**Complaint Against** 

DEANNE LONG, M.D.,

Respondent.

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Case No. 15-40633-1

FILED

OCT 2 7 2015

NEVADA STATE BOARD OF MEDICAL EXAMINERS

## **COMPLAINT**

The Investigative Committee<sup>1</sup> (IC) of the Nevada State Board of Medical Examiners (Board) hereby issues this formal Complaint (Complaint) against Deanne Long, M.D. (Respondent), a licensed physician in Nevada. After investigating this matter, the IC has a reasonable basis to believe that Respondent has violated provisions of Nevada Revised Statutes (NRS) chapter 630 and Nevada Administrative Code (NAC) chapter 630 (collectively, the Medical Practice Act). The IC alleges the following facts:

- 1. Respondent is currently licensed in active status (License No. 14790), and has been licensed by the Board since May 13, 2013, pursuant to the provisions of the Medical Practice Act.
- 2. On or about January 22, 2015, the Division of Occupational and Professional Licensing of the Department of Commerce of the State of Utah (Utah Medical Board) entered into a Stipulation and Order (Stipulation) with Respondent. Pursuant to the terms of the Stipulation, Respondent's license to practice medicine in Utah was revoked, with said revocation stayed and Respondent placed on probation for a period of five years subject to various terms and conditions.

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<sup>&</sup>lt;sup>1</sup> At the time of authorizing the filing of this Complaint, the Investigative Committee of the Nevada State Board of Medical Examiners was composed of Board members Theodore B. Berndt, M.D., Chairman, Valerie J. Clark, BSN, RHU, LUTCF, Member, and Michael J. Fischer, M.D., Member.

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- 3. The Board may initiate disciplinary action against a licensee when it finds another state has taken disciplinary action, including, without limitation, the revocation of a license to practice medicine, against the licensee. NRS 630.301(3)
- 4. Based on the foregoing factual allegations, the Board may discipline Respondent because on or about January 22, 2015, the Utah Medical Board revoked Respondent's license. with said revocation stayed and Respondent placed on probation for a period of five years subject to various terms and conditions.
- 5. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

## WHEREFORE, the Investigative Committee prays:

- 1. That the Board give Respondent notice of the charges herein against her and give her notice that she may file an answer to the Complaint herein as set forth in NRS 630.339(2) within 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 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 and day of October, 2015.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

General Counsel for the Board

Attorney for the Investigative Committee

# OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners

## **VERIFICATION**

STATE OF NEVADA ) : ss. COUNTY OF WASHOE )
Theodore B. Berndt, M.D., laws of the state of Nevada that
Nevada State Board of Medical E
Respondent herein; that he has discovered during the course of the
the allegations and charges in the correct.
Dated this 27th day of 0

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 based upon information discovered during the course of the investigation into a complaint against Respondent, he believes the allegations and charges in the foregoing Complaint against Respondent are true, accurate and correct.

Heodore B. Berndt, M.D.

# OFFICE OF THE GENERAL COUNSEL

## **CERTIFICATE OF MAILING**

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 27th day of October 2015; I served a file stamp copy of COMPLAINT & FINGERPRINT INFORMATION, via USPS e-certified return receipt mail to the following:

> Deanne Long, M.D. 1605 E. Shadow Salt Lake City, UT 84121-3664

Dated this 27<sup>th</sup> day of October, 2015.

Angelia L. Donohoe Legal Assistant