BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

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In the Matter of Charges and

Complaint Against

TIMOTHY D. BECKETT, M.D.,

Respondent.

Case No. 15-26736-1

APR - 8 2015

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 of Theodore B. Berndt, M.D., Valerie J. Clark, BSN, RHU, LUTCF, and Michael J. Fischer, M.D., by and through Erin L. Albright, Esq., General Counsel and attorney for the IC, having a reasonable basis to believe that Timothy D. Beckett, M.D. (Respondent), 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 Complaint, stating the IC's charges and allegations as follows:

- 1. Respondent was licensed by the Board, pursuant to the provisions of the Medical Practice Act, on December 23, 2002, and is currently licensed in active status (License No. 10395).
- 2. On August 9, 2010, Respondent was arrested by the Las Vegas Metropolitan Police Department for domestic violence.
- 3. In 2011, Respondent renewed his license to practice medicine in the state of Nevada. On his renewal application, Respondent failed to disclose that he was arrested for domestic violence on August 9, 2010.

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Count I

- 4. All of the allegations in the above paragraphs are hereby incorporated as if fully set forth herein.
- 5. NRS 630.304(1) provides that obtaining, maintaining or renewing or attempting to obtain, maintain or renew a license to practice medicine by bribery, fraud or misrepresentation or by any false, misleading, inaccurate or incomplete statement is grounds for initiating discipline against a licensee.
- 6. By failing to disclose the arrest on August 9, 2010 on his Nevada medical license renewal application, Respondent was obtaining, maintaining or renewing or attempting to obtain, maintain or renew his license to practice medicine by fraud, misrepresentation or any false, misleading, inaccurate or incomplete statement.
- 7. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

Count II

- 8. All of the allegations in the above paragraphs are hereby incorporated as if fully set forth herein.
- 9. NRS 630.306(2)(a) provides that engaging in any conduct which is intended to deceive is grounds for initiating discipline against a licensee.
- 10. Respondent's aforementioned activities constitute conduct which was intended to deceive.
- 11. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

WHEREFORE, the Investigative Committee prays:

- That the Board give Respondent notice of the charges herein against him and give 1. 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 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 8^{H} day of April, 2015.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

Erin L. Mbright, Esq.

General Counsel

Attorney for the Investigative Committee

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners

Nevada State Board of Medical Examiners 1105 Terminal Wav #301

VERIFICATION

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 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.

Dated this 8⁴⁴⁷ day of April , 2015.

Theodore B. Berndt, M.D.

OFFICE OF THE GENERAL COUNSEL

Nevada State Board of Medical Examiners 1105 Terminal Way #301

CERTIFICATE OF SERVICE

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 8th day of April 2015; I served a filed copy of COMPLAINT and Fingerprint Information, via USPS e-certified return receipt mail to the following:

> Timothy Beckett, M.D. 10120 South Eastern Ave., Ste. 200 Henderson, NV 89052

Dated this 8th day of April, 2015.

Angelia L. Donohoe Legal Assistant