

COUNT IV

Patient B - NRS 630.304(7)

(Terminating the Medical Care of a Patient Without Adequate Notice or Without Making Other Arrangements for the Continued Care of the Patient)

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

32. NRS 630.304(7) provides that terminating the medical care of a patient without adequate notice or without making other arrangements for the continued care of the patient constitutes grounds for initiating disciplinary action.

33. Respondent failed to properly terminate the medical care of Patient B when his office staff called Patient B and terminated his medical care while he was still experiencing discomfort and still undergoing YAG laser treatments for epithelial ingrowth.

34. 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 Nevada State Board of Medical Examiners 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 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 to impose if it determines there has been a violation or violations of the Medical Practice Act committed by Respondent;

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

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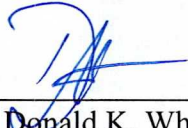
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5. That the Nevada State Board of Medical Examiners take such other and further action as may be just and proper in these premises.

DATED this 15 day of August, 2019.

INVESTIGATIVE COMMITTEE OF
THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 
Donald K. White, Esq., Deputy General Counsel
Attorneys for the Investigative Committee

VERIFICATION


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STATE OF NEVADA)
 : ss.
COUNTY OF WASHOE)

Wayne Hardwick, M.D., having been duly sworn, hereby deposes and states under penalty of perjury that he is the Chairman of the Investigative Committee of the Nevada State Board of Medical Examiners that authorized the Complaint against the Respondent herein; that he has read the foregoing Complaint; and that based upon information discovered in the course of the investigation into a complaint against Respondent, he believes that the allegations and charges in the foregoing Complaint against Respondent are true, accurate, and correct.

DATED this 15th day of August, 2019.

INVESTIGATIVE COMMITTEE OF
THE NEVADA STATE BOARD OF MEDICAL EXAMINERS



Wayne Hardwick, M.D., Chairman

CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 23rd day of August, 2019; I served a filed copy of the COMPLAINT (19-13009-1), via USPS e-certified return receipt mail to the following:

Jon L. Siems, M.D.
8230 West Sahara Avenue, Suite #111
Las Vegas, NV 89117

Dated this 23rd day of August, 2019.



Dawn DeHaven Gordillo
Legal Assistant