BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * * *

In the Matter of Charges and Complaint **Against:**

DIETRICH VON FELDMANN, M.D.,

Respondent.

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Case No. 23-31575-1 FILED

JUN 15 2023

NEVADA STATE BOARD OF

COMPLAINT

The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners (Board) hereby issues this formal Complaint against Dietrich Von Feldmann, 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:

- Respondent is currently, licensed in suspended status (License No. 12002). 1. Respondent was issued his license from the Board on August 17, 2006, pursuant to the provisions of NRS Chapter 630.
- On December 2, 2022, Respondent was found to have violated the Medical 2. Practice Act by violating NRS 630.301(4) Malpractice.
- On December 9, 2022, at 6:01 p.m., Respondent was served via USPS Certified 3. Mail (tracking no. 9171969009350254764250) with the Board's Findings of Fact, Conclusions of Law, and Order (Board's Order), filed December 8, 2022, which provided explicit instructions regarding his specific requirements and deadlines to achieve compliance with Board's Order.

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¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time the filing of this Complaint was approved, was composed of Victor M. Muro, M.D., Chowdhury H. Ahsan, M.D., Ph.D., FACC, and Ms. Pamela J. Beal.

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- 4. The Board's Order clearly stated that Respondent was ordered unequivocally to: submit to a physical and mental examination to evaluate his competence to practice medicine within six (6) months of the service of the Board's Order pursuant to NRS 630.352(4)(j); pay a fine of two thousand dollars (\$2,000), and pay costs and expenses actually incurred in the investigation and prosecution of the matter in the amount of eight thousand six hundred and twenty-one dollars, and ninety cents (\$8,621.90) within six (6) months of service of the Board's Order.
- 5. To date, Respondent has failed to submit to the Board the ordered physical and mental examination within the allotted time as specified in the Board's Order, nor has the Respondent paid the fine or costs imposed by the Order.

COUNT I

NRS 630.3065(2)(a) - Knowing or Willful Failure to Comply with a Board Order

- 6. All of the allegations in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 7. NRS 630.3065(2)(a) provides that the knowing or willful failure to comply with an order of the Board constitutes grounds for initiating disciplinary action.
- 8. Respondent knowingly or willfully failed to comply with an order of the Board when he failed to submit to a Board ordered mental and physical examination, and remit payment for fines and costs imposed by the Order.
- 9. 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 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);

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OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners 9600 Gateway Drive Reno, Nevada 89521 (775) 688-2559

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3.	That the Board determine what sanctions to impose if it determines there has been
a violation or	violations of the Medical Practice Act committed by Respondent;

- make, issue and serve on Respondent its findings of fact, writing, that includes the sanctions imposed; and
- ke such other and further action as may be just and proper in these

June, 2023.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

IAN J. CUMINGS, Deputy General Counsel 9600 Gateway Drive Reno, NV 89521

Tel: (775) 688-2559

Email: <u>icumings@medboard.nv.gov</u> Attorney for the Investigative Committee

(775) 688-2559

VERIFICATION

STATE OF NEVADA)
	: SS
COUNTY OF CLARK)

Victor M. Muro, 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 5 day of June, 2023.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

m mund Mos By:

VICTOR M. MURO, M.D.

Chairman of the Investigative Committee

CERTIFICATE OF SERVICE

I hereby certify that I am employed by the Nevada State Board of Medical Examiners and that on the 15th day of June 2023, I served a file-stamped copy of the foregoing **COMPLAINT**, via USPS Certified Mail, postage pre-paid, to the following parties:

DIETRICH VON FELDMANN, M.D. 7696 Stone Bluff Way Reno, NV 89523 Respondent

9171 9690 0935 0255 6992 78

Tracking No.:_____

With courtesy copy by email to:

Patricia Halstead, Esq. [phalstead@halsteadlawoffices.com] *Hearing Officer*

DATED this // day of June, 2023.

MEG BYRD

Nevada State Board of Medical Examiners