

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

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4
5 **In the Matter of Charges and Complaint**

Case No. 23-13009-1

6 **Against:**

7 **JON LANE SIEMS, M.D.,**

8 **Respondent.**

FILED

JAN 30 2023

NEVADA STATE BOARD OF
MEDICAL EXAMINERS

BY: 

9
10 **COMPLAINT**

11 The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners
12 (“Board”) hereby issues this formal Complaint against Jon L. Siems, M.D. (hereinafter referred to
13 as Respondent), a licensed physician in Nevada. After investigating this matter, the IC has a
14 reasonable basis to believe that Respondent has violated provisions of Nevada Revised Statutes
15 (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the
16 Medical Practice Act).

17 The IC alleges the following facts:

18 1. Respondent is currently, and was at all times relevant to this Complaint, licensed in
19 active status (License No. 9250). Respondent was issued his license from the Board on December
20 20, 1999, pursuant to the provisions of NRS Chapter 630.

21 2. On November 29, 2021, the IC entered into a Settlement Agreement² with
22 Respondent and on December 3, 2021 the Board approved the Settlement Agreement.

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24 ¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time the filing of this
25 Complaint was approved, was composed of Bret W. Frey, M.D., Carl N. Williams, Jr., M.D. FACS, and Col. Eric D.
26 Wade, USAF (Ret.).

27 ² 13. Failure to Comply with Terms. Should Respondent fail to comply with any term or condition of this
28 Agreement once the Agreement has been accepted, approved and adopted by the Board, the IC shall be authorized to
immediately suspend Respondent’s license to practice medicine in Nevada pending an Order to Show Cause Hearing,
which will be duly noticed. **Failure to comply with the terms of this Agreement, including failure to pay any
fines, costs, expenses or fees owed to the Board, is a failure to comply with an order of the Board, which may
result in additional disciplinary action being taken against Respondent.** NRS 630.3065(2)(a). Further,
Respondent’s failure to remit payment to the Board for monies agreed to be paid as a condition of this Agreement
may subject Respondent to any civil and administrative collection efforts available.

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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;

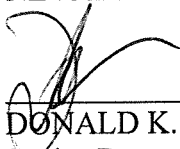
4. That the Nevada State Board of Medical Examiners make, issue and serve on Respondent its findings of fact, conclusions of law and order, in writing, that includes the sanctions imposed; and

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 30th day of January, 2023.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: _____


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Attorney for the Investigative Committee

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VERIFICATION

STATE OF NEVADA)
 : ss.
COUNTY OF WASHOE)

Bret W. Frey, 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 30th day of January, 2023.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

BRET W. FREY, M.D.
Chairman of the Investigative Committee