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

\* \* \* \* \*

In the Matter of Charges and Complaint

Against:

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DAVID MICHAEL SNIPPER, M.D.,

Respondent.

Case No. 25-8772-1

**FILED** 

JAN 2 8 2025

NEVADA STATE BOARD OF MEDICAL EXAMINERS By:

### **COMPLAINT**

The Investigative Committee<sup>1</sup> (IC) of the Nevada State Board of Medical Examiners (Board), by and through Ian J. Cumings, Senior Deputy General Counsel and attorney for the IC, having a reasonable basis to believe that David Michael Snipper, 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 at all times relative to this Complaint a medical doctor holding an active license to practice medicine in the State of Nevada (License No. 6112). Respondent was originally licensed by the Board on August 25, 1990, and specializes in anesthesiology.
- 2. On February 23, 2024, Respondent entered into a Settlement Agreement with the IC. The Settlement Agreement was approved by the Board and an Order was filed on June 7, 2024.
- 3. Per the terms of the Settlement Agreement and Board Order, Respondent was to complete six (6) hours of continuing medical education (CME) in addition to those hours regularly required for maintaining his license in the State of Nevada. The Settlement Agreement was

<sup>&</sup>lt;sup>1</sup> The Investigative Committee of the Nevada State Board of Medical Examiners, at the time this formal Complaint was authorized for filing, was composed of Board members Bret W. Frey, M.D., Col. Eric D. Wade, USAF (Ret.), and Hugh L. Bassewitz, M.D., FAAOS.

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approved and adopted on June 7, 2024, requiring completion of the terms on or before December 9, 2024.

To date, Respondent has failed to submit to the Board the ordered CME hours within 4. the allotted time as specified in the Board's Order.

### **COUNT I**

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

- All of the allegations in the above paragraphs are hereby incorporated by reference 5. as though fully set forth herein.
- NRS 630.3065(2)(a) provides that the knowing or willful failure to comply with an 6. order of the Board constitutes grounds for initiating disciplinary action.
- Respondent knowingly or willfully failed to comply with an order of the Board 7. when he failed to submit the required hours six (6) hours of additional CME imposed by the Board's Settlement Agreement and Order, filed June 7, 2024.
- By reason of the foregoing, Respondent is subject to discipline by the Board as 8. 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;
- That the Board set a time and place for a formal hearing after holding an Early 2. Case Conference pursuant to NRS 630.339(3);
- That the Board determine what sanctions to impose if it determines there has been 3. a violation or violations of the Medical Practice Act committed by Respondent;
- That the Board award fees and costs for the investigation and prosecution of this 4. case as outlined in NRS 622.400;
- That the Board make, issue and serve on Respondent its findings of fact, 5. conclusions of law and order, in writing, that includes the sanctions imposed; and

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# OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners 9600 Gateway Drive Reno, Nevada 89521

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6.	That the Board take such other and further action as may be just and proper in these
nremises.	

DATED this 28th day of January, 2025.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

IAN J. CUMINGS,

Senior 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

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

### VERIFICATION

STATE OF NEVADA	) : ss. )
OUNTY 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 28th day of January, 2025.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

BRET W. FREY, M.D.

Chairman of the Investigative Committee