

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

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6 **In the Matter of Charges and** ) **Case No. 12-11024-1**  
7 **Complaint Against** )  
8 **THOMAS NELSON ABDELLA, M.D.,** )  
9 **Respondent.** )  
10 \_\_\_\_\_ )

**FILED**  
**MAR 28 2013**  
NEVADA STATE BOARD OF  
MEDICAL EXAMINERS  
By: \_\_\_\_\_

11  
12 **FIRST AMENDED COMPLAINT**

13 The Investigative Committee of the Nevada State Board of Medical Examiners (Board),  
14 composed at the time of filing of Thomas B. Berndt, M.D., Chairman,  
15 Valerie J. Clark, BSN, RHU, LUTCF, Member, and Michael J. Fischer, M.D., Member, by and  
16 through Erin L. Albright, Esq., Deputy General Counsel for the Board and attorney for the IC,  
17 having a reasonable basis to believe that Thomas Abdella, M.D. (Respondent), violated the  
18 provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code  
19 Chapter 630 (collectively, the Medical Practice Act), hereby issues its formal Complaint, stating  
20 the Investigative Committee's charges and allegations as follows:

21 1. Respondent is currently licensed in active status (License No. 7589), and has been  
22 so licensed since October 12, 1995 by the Board pursuant to the provisions of the  
23 Medical Practice Act.

24 2. Patient A was a forty-three (43)-year-old female at the time of the incident in  
25 question. Her true identity is not disclosed in this First Amended Complaint to protect her  
26 identity, but her identity was disclosed in the Patient Designation served on Respondent in the  
27 initial Complaint.

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OFFICE OF THE GENERAL COUNSEL  
Nevada State Board of Medical Examiners  
1105 Terminal Way #301  
Reno, Nevada 89502  
(775) 688-2559

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5. That the Board takes such other and further action as may be just and proper in these premises.

DATED this 20<sup>th</sup> day of March, 2013.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: *Erin L. Albright*  
Erin L. Albright, Esq.  
Deputy General Counsel  
Attorney for the Investigative Committee

VERIFICATION

1 STATE OF NEVADA )  
2 : ss.  
3 COUNTY OF WASHOE )

4 Theodore B. Berndt, M.D., hereby deposes and states under penalty of perjury under the  
5 laws of the state of Nevada that he is the Chairman of the Investigative Committee of the  
6 Nevada State Board of Medical Examiners that authorized the foregoing Complaint against the  
7 Respondent herein; that he has read the foregoing Complaint; and that based upon information  
8 discovered during the course of the investigation into a complaint against Respondent, that he  
9 believes the allegations and charges in the foregoing Complaint against Respondent are true,  
10 accurate and correct.

11 Dated this 28<sup>th</sup> day of March, 2013.

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13 Theodore B. Berndt  
14 Theodore B. Berndt, M.D.  
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CERTIFICATE OF MAILING


I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 28<sup>th</sup> day of March 2013; I served a filed copy of the FIRST AMENDED COMPLAINT, via USPS regular mail to the following:

S. Brent Vogel, Esq.  
6385 S. Rainbow Blvd., Ste. 600  
Las Vegas, NV 89118

&

Pat Dolan, J.D., Hearing Officer  
7980 Meadow Vista Court  
Reno, NV 89511

Dated this 28<sup>th</sup> day of March, 2013.

  
\_\_\_\_\_  
Angelia L. Donohoe  
Legal Assistant