





1           12.    As demonstrated by, but not limited to, the above-outlined facts, Respondent's acts  
2 in relation to Patient A constitute malpractice.

3           13.    By reason of the foregoing, Respondent is subject to discipline by the  
4 Board as provided in NRS 630.352.

5           **WHEREFORE**, the IC prays:

6           1.    That the Board give Respondent notice of the charges herein against her and give  
7 her notice that she may file an answer to the Complaint herein as set forth in NRS 630.339 within  
8 twenty (20) days of service of the Complaint;

9           2.    That the Board set a time and place for a formal hearing after holding an Early Case  
10 Conference pursuant to NRS 630.339(3);

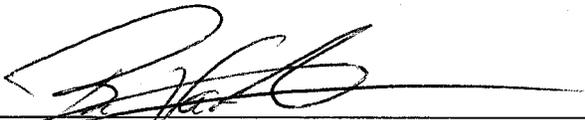
11          3.    That the Board determine what sanctions to impose if it finds and concludes that  
12 there has been a violation or violations of the MPA committed by Respondent;

13          4.    That the Board make, issue and serve on Respondent its findings of fact,  
14 conclusions of law and order, in writing, that includes the sanctions to be imposed; and,

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

17           DATED this 8<sup>th</sup> day of January, 2014.

18  
19                                   INVESTIGATIVE COMMITTEE OF THE  
20                                   NEVADA STATE BOARD OF MEDICAL EXAMINERS

21                                   By:   
22                                   Bradley O. Van Ry, Esq.  
23                                   General Counsel  
24                                   Attorney for the Investigative Committee

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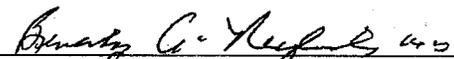
VERIFICATION

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STATE OF NEVADA            )  
  : ss.  
COUNTY OF CLARK         )

Beverly A. Neyland, M.D., hereby deposes and states under penalty of perjury under the laws of the state of Nevada that she is the Chairman of the Investigative Committee of the Nevada State Board of Medical Examiners that authorized the foregoing Complaint against the Respondent herein; that she has read the foregoing Complaint; and that based upon information discovered during the course of the investigation into a complaint against Respondent, she believes the allegations and charges in the foregoing Complaint against Respondent are true, accurate and correct.

Dated this 8<sup>th</sup> day of January, 2014.

  
Beverly A. Neyland, M.D.

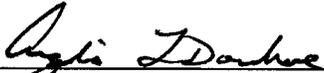
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**CERTIFICATE OF SERVICE**

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 8<sup>th</sup> day of January 2014; I served a filed copy of COMPLAINT, PATIENT DESIGNATION & FINGERPRINT INFORMATION, via USPS e-certified mail to the following:

Leslie Browder, M.D.  
2040 W. Charleston Blvd., #601  
Las Vegas, NV 89102

Dated this 8<sup>th</sup> day of January, 2014.

  
\_\_\_\_\_  
Angella L. Donohoe  
Legal Assistant