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

\* \* \* \* \*

**In the Matter of Charges and  
Complaint Against  
WESLEY WILKINSON HALL, M.D.,  
Respondent.**

Case No. 14-3719-1

**FILED**

**JUL 01 2014**

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS

By: 

**COMPLAINT**

The Investigative Committee (IC) of the Nevada State Board of Medical Examiners (Board), composed at the time of filing of Beverly A. Neyland, M.D., Sue Lowden and Bashir Chowdhry, M.D., by and through Erin L. Albright, Esq., General Counsel and attorney for the IC, having a reasonable basis to believe that Wesley Wilkinson Hall, 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 formal Complaint, stating the IC's charges and allegations as follows:

1. Respondent is currently licensed in active status (License No. 2416), and has been so licensed by the Board since September 3, 1969, pursuant to the provisions of the Medical Practice Act.

2. Patient A was a thirty-nine (39)-year-old obese male with an acutely inflamed gallbladder, with adherences of the common duct, at the time of the incident in question. His true identity is not disclosed in this Complaint to protect his identity, but his identity is disclosed in the Patient Designation served contemporaneously on Respondent with a copy of this Complaint.

3. On or about December 30, 2010, Patient A underwent a laparoscopic cholecystectomy performed by Respondent. During the procedure, Respondent erroneously cut

1 Patient A's common bile/hepatic duct instead of the cystic duct. Respondent failed to recognize  
2 this injury during the procedure.

3 4. In performing the laparoscopic cholecystectomy on Patient A, Respondent failed to  
4 utilize the Critical View approach, which allows surgeons to discover ductal abnormalities or  
5 adherences of the common bile duct to the gallbladder. This approach would have allowed  
6 Respondent to discover that Patient A's acutely inflamed gallbladder had adherences of the  
7 common duct.

8 5. Patient A's medical records do not demonstrate that Respondent: utilized the  
9 Critical View approach during the laparoscopic cholecystectomy; postoperatively diagnosed  
10 and/or evaluated Patient A for a bile leak; postoperatively evaluated Patient A for a retained  
11 common bile duct stone; postoperatively evaluated Patient A for pancreatitis; reviewed Patient  
12 A's vital signs; and/or ordered a complete blood count performed on Patient A.

13 **COUNT I**

14 **(Medical Records Violation)**

15 6. All of the allegations in the above paragraphs are hereby incorporated as if fully set  
16 forth herein.

17 7. NRS 630.3062(1) provides that the failure to maintain timely, legible, accurate and  
18 complete medical records relating to the diagnosis, treatment and care of a patient is grounds for  
19 initiating discipline against a licensee.

20 8. As demonstrated by, but not limited to the above-outlined facts, Respondent failed  
21 to maintain timely, legible, accurate and complete medical records relating to the diagnosis,  
22 treatment and care of Patient A when he failed to document that he: postoperatively diagnosed  
23 and/or evaluated Patient A for a bile leak; postoperatively evaluated Patient A for a retained  
24 common bile duct stone; postoperatively evaluated Patient A for pancreatitis; reviewed Patient  
25 A's vital signs; and ordered a complete blood count performed on Patient A.

26 9. By reason of the foregoing, Respondent is subject to discipline by the Board as  
27 provided in NRS 630.352.

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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 take such other and further action as may be just and proper in these premises.

DATED this 30<sup>th</sup> day of ~~July~~ <sup>June</sup>, 2014.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

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

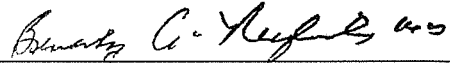
VERIFICATION

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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 Chair 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 1<sup>st</sup> day of July, 2014.

  
\_\_\_\_\_  
Beverly A. Neyland, M.D.

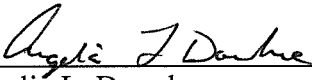
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**CERTIFICATE OF SERVICE**

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 1<sup>st</sup> day of July 2014; I served a filed copy of COMPLAINT, PATIENT DESIGNATION & FINGERPRINT INFORMATION, via USPS e-certified mail to the following:

Wesley Wilkinson Hall, MD  
635 Sierra Rose Drive, Ste. A  
Reno, NV 89511

Dated this 1<sup>st</sup> day of July, 2014.

  
\_\_\_\_\_  
Angeli L. Donohoe  
Legal Assistant