


For Public

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

**In The Matter of Charges and
Complaint Against
STEVEN GARY YEARSLEY, M.D.,
Respondent.**

NO. _____
Case No. 07-12232-1
FILED 15 July 2009

EXECUTIVE DIRECTOR

FIRST AMENDED COMPLAINT

The Investigative Committee of the Board of Medical Examiners of the state of Nevada, composed of Charles Held, M.D., Chairman, Cindy Lamerson, M.D., Member, and Jean Stoess, M.A., Member, by and through Lyn E. Beggs, Deputy General Counsel for the Nevada State Board of Medical Examiners, having a reasonable basis to believe that Steven Gary Yearsley, M.D., hereinafter referred to as "Respondent," has violated the provisions of NRS Chapter 630, hereby issues its formal Complaint, stating the Investigative Committee's charges and allegations, as follows:

1. Respondent is licensed in active status to practice medicine in the State of Nevada, and at all times alleged herein, was so licensed by the Nevada State Board of Medical Examiners, pursuant to the provisions of Chapter 630 of the Nevada Revised Statutes.

2. Respondent was granted a license to practice medicine by the state of Utah in June 2002.

3. On February 9, 2006, Utah revoked Respondent's license to practice medicine for gross negligence and incompetence in the treatment of patients, however, the revocation was stayed and Respondent was placed on probation with multiple conditions for a period of three years.

4. On May 8, 2006, the Medical Board of California filed an Accusation against Respondent based upon the action taken by the state of Utah.

5. On February 23, 2007, an order was entered by the Medical Board of California adopting a Stipulated Surrender of License regarding Respondent's license to practice in the state of California.

1 6. The stipulated surrender of Respondent's California medical license went into effect on
2 March 2, 2007.

3 **Count I**

4 7. Section 630.301(3) of the Nevada Revised Statutes provides that the suspension,
5 modification or limitation of the license to practice any type of medicine by any other jurisdiction or the
6 surrender of the license while under investigation by any licensing authority is grounds for disciplinary
7 action.

8 8. The modification of Respondent's license to practice medicine in the state of Utah
9 constitutes a violation of the provisions of NRS 630.301(3).

10 9. By reason of the foregoing, Respondent is subject to discipline by the Nevada State
11 Board of Medical Examiners as provided in Section 630.352 of the Nevada Revised Statutes.

12 **Count II**

13 10. Section 630.301(3) of the Nevada Revised Statutes provides that the suspension,
14 modification or limitation of the license to practice any type of medicine by any other jurisdiction or the
15 surrender of the license while under investigation by any licensing authority is grounds for disciplinary
16 action.

17 11. The stipulated surrender of Respondent's license to practice medicine in the state of
18 California after an Accusation had been filed constitutes a violation of the provisions of NRS
19 630.301(3).

20 12. By reason of the foregoing, Respondent is subject to discipline by the Nevada State
21 Board of Medical Examiners as provided in Section 630.352 of the Nevada Revised Statutes.

22 WHEREFORE, the Investigative Committee prays:

23 1. That the Nevada State Board of Medical Examiners fix a time and place for a formal
24 hearing;

25 2. That the Nevada State Board of Medical Examiners give Respondent notice of the
26 charges herein against him, the time and place set for the hearing, and the possible sanctions against
27 him;

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1 3. That the Nevada State Board of Medical Examiners determine what sanctions it
2 determines to impose for the violation or violations committed by Respondent; and

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

6 5. That the Nevada State Board of Medical Examiners take such other and further action as
7 may be just and proper in these premises.

8 DATED this 15th day of July, 2008.

10 INVESTIGATIVE COMMITTEE OF
11 THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

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13 By: 
14 Lyn E. Beggs
15 Attorney for the Investigative Committee of the Nevada
 State Board of Medical Examiners
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VERIFICATION

STATE OF NEVADA)
 : ss.
COUNTY OF DOUGLAS)

Charles N. Held, 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 15th day of July, 2008.



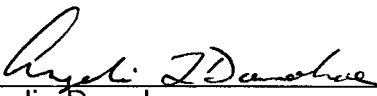
Charles N. Held, M.D.

1 **CERTIFICATE OF MAILING**

2 I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on
3 the 15th day of July 2008, I served a file copy of the FIRST AMENDED COMPLAINT, via USPS
4 certified return receipt to the following:

5
6 Steven Yearsley, M.D.
7 PO Box 506
8 Arco, ID 83213

9 Dated this 15th day of July 2008.

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Angelina Donohoe
13 Legal Assistant
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