

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

3 * * * * *

4 **In The Matter of Charges and**)
5 **Complaint Against**)
6 **CONRAD R. MURRAY, M.D.,**)
7 **Respondent.**)
8 _____)
9

Case No. 10-12785-1

FILED
MAR 01 2010
NEVADA STATE BOARD OF
MEDICAL EXAMINERS

10 **COMPLAINT**

11 The Investigative Committee of the Nevada State Board of Medical Examiners (Board),
12 composed of Charles N. Held, M.D., Theodore B. Berndt, M.D., and Ms. Renee West, by and
13 through Edward O. Cousineau, General Counsel for the Board and Attorney for the Investigative
14 Committee, having a reasonable basis to believe that Conrad R. Murray, M.D., hereinafter referred
15 to as "Respondent," has violated the provisions of NRS Chapter 630, hereby issues its formal
16 Complaint, stating the Investigative Committee's charges and allegations, as follows:

17 1. Respondent was licensed in active status to practice medicine in the State of
18 Nevada on August 17, 1999, and was so licensed by the Board, pursuant to the provisions of
19 Chapter 630 of the Nevada Revised Statutes.

20 2. On or about June 13, 2007, the Board received Respondent's Application for
21 Registration Renewal of License for the 2007-2009 biennial registration period. One of the
22 questions in the Application asked, "Are you out of compliance with court ordered child support?"
23 Respondent answered in the negative.

24 3. On or about June 19, 2009, the Board received Respondent's Application for
25 Registration Renewal of License for the 2009-2011 biennial registration period. One of the
26 questions in the Application asked, "Are you out of compliance with court ordered child support?"
27 Respondent again answered in the negative.

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1 4. Precedent to the filing of this Complaint, the Board came to learn that Respondent
2 was in arrears, and not in compliance, with a court ordered child support obligation which
3 originated out of the state of California. In June of 2007, Respondent's child support arrearages
4 totaled \$7,255.86, and in June of 2009, Respondent's child support arrearages totaled \$10,131.05.

5 5. Based upon the foregoing, Respondent failed to notice the Board in either his 2007-
6 2009 or 2009-2011 Registration Renewal of Licensure Applications that he was in arrears and out
7 of compliance with a court ordered child support obligation.

8 6. Section 630.304(1) of the Nevada Revised Statutes (NRS) provides that obtaining,
9 maintaining or renewing or attempting to obtain, maintain or renew a license to practice medicine
10 by bribery, fraud or misrepresentation or by any false, misleading, inaccurate or incomplete
11 statement is grounds for disciplinary action.

12 7. Respondent violated NRS 630.304(1) when he twice failed to disclose to the Board
13 that he was out of compliance with his court ordered child support obligation, and is subject to
14 discipline by the Board as provided in NRS 630.352.

15 WHEREFORE, the Investigative Committee prays:

- 16 1. That the Board set a time and place for a formal hearing;
- 17 2. That the Board give Respondent notice of the charges herein against him, the time
18 and place set for the hearing, and the possible sanctions against him;
- 19 3. That the Board determine what sanctions it determines to impose for the violation
20 or violations committed by Respondent;
- 21 4. That the Board make, issue and serve on Respondent its findings of facts,
22 conclusions of law and order, in writing, that includes the sanctions imposed;
- 23 5. That the Board take such other and further action as may be just and proper in these
24 premises.

25 DATED this 1st day of March, 2010.

26
27 By: _____


Edward Cousineau
Attorney for the Investigative Committee of the
Nevada State Board of Medical Examiners

CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 1st day of March 2010, I served a file copy of the COMPLAINT, and copy of the Appointment Letter and all the information for Fingerprint Processing by mailing via USPS certified return receipt mail to the following:

Charles H. Peckham, Esq.
Peckham, PLLC
Two Bering Park, 800 Bering, Ste. 220
Houston, TX 77057

Dated this 1st day of March 2010.



Angelia L. Donohoe
Legal Assistant