

BEFORE THE BOARD OF MEDICAL EXAMINERS
OF THE STATE OF NEVADA

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In The Matter of Charges and)
Complaint Against)
JAMES LEE UNGER, M.D.,)
Respondent.)

Case No. 10-6159-1

FILED
JUN 03 2010

NEVADA STATE BOARD OF
MEDICAL EXAMINERS

COMPLAINT

The Investigative Committee of the Nevada State Board of Medical Examiners, composed at the time filing of Charles N. Held, M.D., Chairman, Theodore B. Berndt, M.D., Member, and Valerie J. Clark, Member, having a reasonable basis to believe that James Lee Unger, 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 currently licensed in active status (License No. 4223), and has been so licensed since January 1, 1981 by the Nevada State Board of Medical Examiners pursuant to the provisions of Chapter 630 of the Nevada Revised Statutes.
2. Patient A was a thirty year old (30) female at the time of the incidents in question. Her true identity is not disclosed to protect her privacy, but her identity is disclosed in the Patient Designation served on Respondent along with a copy of this Complaint.
3. On November 4, 2008, Respondent diagnosed a cervical biopsy from Patient A. He found it to be malignant.
4. As a result and based upon the malignant diagnosis, Patient A underwent a hysterectomy. Following the hysterectomy, the diagnosis of Patient A was amended to a benign diagnosis of squamous dysplasia rather than invasive carcinoma.

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2. That the Nevada State Board of Medical Examiners set a time and place for a formal hearing after holding an Early Case Conference pursuant to NRS §630.339(3);

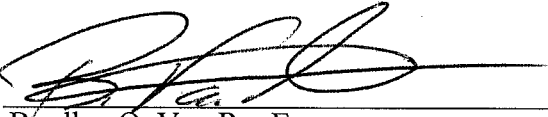
3. That the Nevada State Board of Medical Examiners determine what sanctions it determines to impose if it determines there has been a violation or violations of the Medical Practice Act (Nevada Revised Statutes Chapter 630) committed by Respondent; and

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

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

DATED this 3^d day of June, 2010.

THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 
Bradley O. Van Ry, Esq.
Deputy General Counsel and Attorney for the Investigative Committee

VERIFICATION

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

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

12 Dated this 3rd day of June, 2010.

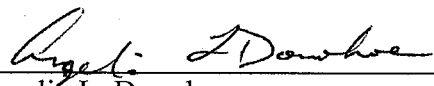
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15 CHARLES N. HELD, M.D.
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CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 3rd day of June 2010; I served a file copy of the COMPLAINT, PATIENT DESIGNATION and Fingerprint Information, by mailing via USPS certified return receipt to the following:

James Unger, M.D.
3059 S. Maryland Parkway #100
Las Vegas, NV 89109

Dated this 3rd day of June 2010.



Angelia L. Donohoe
Legal Assistant