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

SEP 29 2010

NEVADA STATE BOARD OF
MEDICAL EXAMINERS

By: 

**In The Matter of Charges and)
Complaint Against)
LARRY YEE, M.D.,)
Respondent.)**

Case No. 10-6816-1

COMPLAINT

The Investigative Committee of the Nevada State Board of Medical Examiners ("Board"), composed at the time of filing of Charles N. Held, M.D., Chairman, Theodore B. Berndt, M.D., Member, and Valerie J. Clark, Member, by and through Bradley O. Van Ry, Deputy General Counsel, having a reasonable basis to believe that Larry Yee, 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. 4655), and has been so licensed since July 10, 1982 by the Nevada State Board of Medical Examiners pursuant to the provisions of Chapter 630 of the Nevada Revised Statutes.

2. On August 3, 2010, the Investigative Committee issued an order pursuant to NRS §630.311(1) to Respondent ordering his appearance before the committee to address the pending investigation, his medical practice in general, his specialty, the community standard of care and his complaint history with the Board. The appearance date and time was scheduled for August 27, 2010 at 11:30 a.m. at the offices of the Board located at 1105 Terminal Way #301, Reno, NV 89502.

3. Service of the order was made by mailing a true copy by the US Postal Service Certified Mail on August 3, 2010 pursuant to NRS §630.244.

1 4. Acceptance of service was made on behalf of Respondent on August 6, 2010.

2 5. On August 27, 2010, Respondent did not appear before the Investigative
3 Committee as ordered.

4 **Count I**

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

7 7. Nevada Revised Statute Section 630.3065(2)(a) provides that the willful failure to
8 comply with an Order of a committee designated by the Board to investigate a complaint against a
9 physician is grounds for initiating discipline against a licensee.

10 8. 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 **WHEREFORE**, the Investigative Committee prays:

13 1. That the Nevada State Board of Medical Examiners give Respondent notice of the
14 charges herein against him and give him notice that he may file an answer to the Complaint herein
15 as set forth in Section 630.339 of the Nevada Revised Statutes within twenty (20) days of service
16 of the Complaint.

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

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

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

25 5. That the Nevada State Board of Medical Examiners take such other and further

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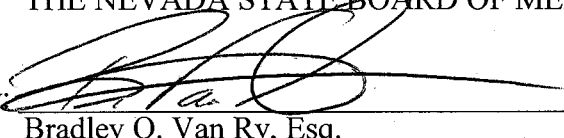
OFFICE OF THE GENERAL COUNSEL
Nevada State Board of Medical Examiners
1105 Terminal Way #301
Reno, Nevada 89502

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action as may be just and proper in these premises.

DATED this 29th day of September, 2010.

THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

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

VERIFICATION

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STATE OF NEVADA)
 : ss.
COUNTY OF DOUGLAS)

Charles N. Held, M.D., hereby deposes and states under penalty of perjury under the laws of the state of Nevada that he 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 he has read the foregoing Complaint; and that based upon information discovered during the course of the investigation into a complaint against Respondent, that he believes the allegations and charges in the foregoing Complaint against Respondent are true, accurate, and correct.

Dated this 29th day of September, 2010.




Charles N. Held, M.D.

CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 29th day of September 2010; I served a file copy of the COMPLAINT and Fingerprint Information by mailing via USPS certified return receipt to the following:

Larry Yee, M.D.
7660 W. Cheyenne Ave., Ste. 110
Las Vegas, NV 89129

Dated this 29th day of September 2010.



Angelia L. Donohoe
Legal Assistant

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