

1 appropriate post-operative imaging, or alternatively, failed to return Patient A to the operating
2 room after he was found to be significantly neurologically worse after the operation.

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

5 **WHEREFORE**, the Investigative Committee prays:

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

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

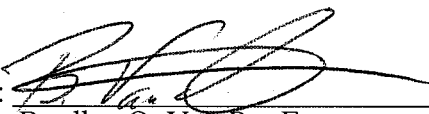
12 3. That the Nevada State Board of Medical Examiners determine what sanctions it
13 determines to impose if it determines there has been a violation or violations of the Medical
14 Practice Act (Nevada Revised Statutes Chapter 630) committed by Respondent; and

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

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

20 DATED this 10th day of June, 2010.

21 THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

22
23 By: 
24 Bradley O. Van Ry, Esq.
25 Deputy General Counsel and Attorney for the Investigative Committee
26
27
28

VERIFICATION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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 16th day of June, 2010.



CHARLES N. HELD, M.D.

OFFICE OF THE GENERAL COUNSEL

Nevada State Board of Medical Examiners
1105 Terminal Way #301
Reno, Nevada 89502
(775) 688-2559

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 16th day of June 2010; I served a file copy of the COMPLAINT, PATIENT DESIGNATION & Fingerprint Information, by mailing via USPS certified return receipt to the following:

William Smith, M.D.
3061 S. Maryland Parkway, #200
Las Vegas, NV 89109

Dated this 16th day of June 2010.



Angelia L. Donohoe
Legal Assistant