

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

3 * * * * *

4
5 **In The Matter of Charges and**)
6 **Complaint Against**)
7 **SUSAN L. BOYD, M.D.,**)
8 **Respondent.**)
9 _____)
10 _____)

Case No. 11-10054-1

FILED

APR 18 2011

**NEVADA STATE BOARD OF
MEDICAL EXAMINERS**

By: *[Signature]*

11 **COMPLAINT**

12 The Investigative Committee of the Nevada State Board of Medical Examiners (Board),
13 composed of Charles N. Held, M.D., Theodore B. Berndt, M.D. and Valerie J. Clark, BSN, RHU,
14 LUTCF, by and through Edward O. Cousineau, Deputy Executive Director for the Board and
15 counsel for the Investigative Committee, having a reasonable basis to believe that
16 Susan L. Boyd, M.D., hereinafter referred to as "Respondent", has engaged in conduct that is
17 grounds for discipline pursuant to the provisions of NRS Chapter 630, hereby alleges, charges and
18 complains against said Respondent as follows:

19 1. Respondent was licensed in active status to practice medicine in the state of
20 Nevada on August 23, 1996 by the Board pursuant to the provisions of Chapter 630 of the
21 Nevada Revised Statutes, and at all times addressed herein was so licensed.

22 2. Respondent indicated specialty with the Board is Obstetrics/Gynecology with her
23 practice address located in Las Vegas.

24 3. Respondent treated three patients who are associated with the allegations within
25 this formal complaint and who will be hereinafter referred to as Patients A, B, and C. The
26 patients' true identities have not been disclosed to protect their privacy, but are disclosed in a
27 separate Patient Designation incorporated by reference to this Complaint. Previous to the
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1 preparation of this Complaint, the Board solicited the services of an independent medical expert
2 to review the medical records of Patients A, B, and C.

3 4. From June of 2008 to April of 2010, Patient A, who is a relative of Respondent,
4 was prescribed various types of narcotics by Respondent. During this timeframe, Patient A
5 resided in the Reno area. The aforementioned expert's review found that in treating Patient A,
6 Respondent prescribed large quantities of narcotics with inadequate documentation in Patient A's
7 medical records to support her prescribing practices. Furthermore, that the prescribing of the
8 narcotics was accomplished absent a physical examination of Patient A by Respondent.

9 5. From January of 2010 to May of 2010, Patient B was prescribed various types of
10 narcotics by Respondent. During this timeframe, Patient B resided in the Reno area. The
11 aforementioned expert's review found that in treating Patient B, Respondent prescribed large
12 quantities of narcotics with inadequate documentation in Patient B's medical records to support
13 her prescribing practices. Furthermore, that the prescribing of the narcotics was accomplished
14 absent a physical examination of Patient B by Respondent.

15 6. From April of 2007 to May of 2010, Patient C was prescribed various types of
16 narcotics by Respondent. The aforementioned expert's review found that in treating Patient C,
17 Respondent prescribed both high doses and quantities of narcotics with inadequate
18 documentation in Patient C's medical records to support her prescribing practices.

19 **COUNT I**

20 7. All of the above paragraphs are incorporated by reference as though fully set forth
21 herein.

22 8. Respondent's prescribing of narcotics for Patient A constitutes malpractice.

23 9. Malpractice is defined at NAC 630.040 as "the failure of a physician, in treating a
24 patient, to use the reasonable care, skill, or knowledge ordinarily used under similar circumstances."

25 10. By reason of the foregoing, Respondent has violated NRS 630.301(4) and is subject
26 to discipline as provided by NRS 630.352.

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COUNT II

11. All of the above paragraphs are incorporated by reference as though fully set forth herein.

12. Respondent’s prescribing of narcotics for Patient B constitutes malpractice.

13. Malpractice is defined at NAC 630.040 as “the failure of a physician, in treating a patient, to use the reasonable care, skill, or knowledge ordinarily used under similar circumstances.”

14. By reason of the foregoing, Respondent has violated NRS 630.301(4) and is subject to discipline as provided by NRS 630.352.

COUNT III

15. All of the above paragraphs are incorporated by reference as though fully set forth herein.

16. Respondent’s prescribing of narcotics for Patient C constitutes malpractice.

17. Malpractice is defined at NAC 630.040 as “the failure of a physician, in treating a patient, to use the reasonable care, skill, or knowledge ordinarily used under similar circumstances.”

18. By reason of the foregoing, Respondent has violated NRS 630.301(4) and is subject to discipline as provided by NRS 630.352.

WHEREFORE, the Investigative Committee prays:

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

2. That the Nevada State Board of Medical Examiners gives Respondent notice of the charges herein against her, the time and place set for the hearing, and the possible sanctions against her;

3. That the Board determine what sanctions it deems appropriate to impose for the violation committed by Respondent; and

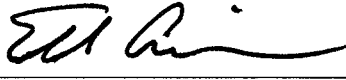
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4. That the Board make, issue and serve on Respondent its findings of facts, conclusions of law and order, in writing, that includes the sanctions imposed.

DATED this 18th day of April, 2011.

INVESTIGATIVE COMMITTEE OF
THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 
Edward O. Cousineau
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 investigated the complaint against Respondent herein; that he has read the foregoing Complaint; and that based upon the results of the Investigative Committee's investigation into a complaint against Respondent, the allegations and charges in the foregoing Complaint against Respondent are true, accurate and correct.

Dated this 18th day of April, 2011.



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 18TH day of April 2011, I served a file copy of the COMPLAINT, PATIENT DESIGNATION & Fingerprint Information, by mailing via USPS certified return receipt mail to the following:

Kristine Maxwell, Esq.
Huggins & Maxwell
8275 S. Eastern Ave., Ste. 200
Las Vegas, NV 89123

Dated this 18th day of April 2011.



Angelia L. Donohoe
Legal Assistant