


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

3 * * * * *

4 **In the Matter of Charges and**) **Case No. 19-48498-1**
5)
6 **Complaint Against**) **FILED**
7 **BEN HUON LEE, M.D.,**) **JUL 17 2019**
8 **Respondent.**)
9 _____)

NEVADA STATE BOARD OF
MEDICAL EXAMINERS
By: 

10 **COMPLAINT**

11 The Investigative Committee (IC)¹ of the Nevada State Board of Medical Examiners
12 (Board), by and through Robert G. Kilroy, Esq., General Counsel for the IC, having a reasonable
13 basis to believe that Ben Huon Lee, M.D. (Respondent), has violated the provisions of Nevada
14 Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630
15 (collectively, the Medical Practice Act), hereby issues its formal Complaint, stating the IC's
16 charges and allegations as follows:

17 1. Respondent was at all times relative to this Complaint a medical doctor holding an
18 active license to practice medicine in the State of Nevada (License No. 17977). Respondent was
19 originally licensed by the Board on June 6, 2018.

20 2. On January 10, 2019, Respondent was the subject of discipline by the Colorado
21 Medical Board, which issued a Letter of Admonition. This formal action was based upon his role
22 as a "medical director" at several laser and skin care clinics and his failure to adequately supervise
23 unlicensed individuals who treated patients at the aforementioned clinics. Respondent did not
24 inform this Board of the aforementioned discipline within 30 days as required.

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28 ¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time this formal Complaint was authorized for filing, was composed of Board members Wayne Hardwick, M.D., Chairman, Mr. M. Neil Duxbury, and Aury Nagy, M.D.

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COUNT I

NRS 630.301(3)

(Out-of-State Discipline Imposed)

3. All of the allegations in the above paragraphs are hereby incorporated by reference as if fully set forth herein.

4. NRS 630.301(3) provides that any disciplinary action, including, without limitation, the revocation, suspension, modification or limitation of a license to practice any type of medicine, taken by another state, the Federal Government, a foreign country or any other jurisdiction or the surrender of the license or discontinuing the practice of medicine while under investigation by any licensing authority, a medical facility, a branch of the Armed Services of the United States, an insurance company, an agency of the Federal Government or an employer, is grounds for initiating discipline against a licensee.

5. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT II

NRS 630.306(1)(k)

(Failure to Report)

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

7. NRS 630.306(1)(k) provides that a failure by the licensee or applicant to report in writing, within 30 days, any disciplinary action taken against the licensee or applicant by another state, the Federal Government or foreign country, including, without limitation, the revocation, suspension, or surrender of a license to practice medicine in another jurisdiction.

8. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

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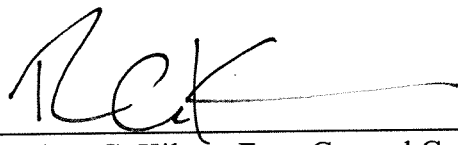
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WHEREFORE, the IC prays:

1. That the Board give Respondent notice of the charges herein against him and give him notice that he may file an answer to the Complaint herein as set forth in NRS 630.339(2) within twenty (20) days of service of the Complaint;
2. That the Board set a time and place for a formal hearing after holding an Early Case Conference pursuant to NRS 630.339(3);
3. That the Board determine what sanctions to impose if it finds and concludes that there has been a violation or violations of the Medical Practice Act committed by Respondent;
4. That the Board make, issue and serve on Respondent its findings of fact, conclusions of law and order, in writing, that includes the sanctions imposed; and
5. That the Board take such other and further action as may be just and proper in these premises.

DATED this 13 day of July 2019.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 
Robert G. Kilroy, Esq., General Counsel
Attorney for the Investigative Committee

1 **VERIFICATION**

2 STATE OF NEVADA)
3 : ss.
4 COUNTY OF WASHOE)

5 Wayne Hardwick, 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, he believes the
10 allegations and charges in the foregoing Complaint against Respondent are true, accurate, and
11 correct.

12 Dated this 17th day of July, 2019.

13 INVESTIGATIVE COMMITTEE OF THE
14 NEVADA STATE BOARD OF MEDICAL EXAMINERS

15 *Wayne Hardwick*

16 _____
Wayne Hardwick, M.D., Chairman

17 OFFICE OF THE GENERAL COUNSEL
18 Nevada State Board of Medical Examiners
19 9600 Gateway Drive
20 Reno, Nevada 89521
21 (775) 688-2559
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CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on the 17th day of July, 2019, I served a filed copy of the formal COMPLAINT, via USPS e-certified, return receipt mail to the following:

Ben Huon Lee
8525 E. Pinnacle Peak Road, Suite 101
Scottsdale, AZ 85255

Dated this 17th day of July, 2019.

Sheri L. Quigley
Sheri L. Quigley, Legal Assistant

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