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# BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

\* \* \* \* \*

In the Matter of Charges and Complaint

**Against:** 

WILLIAM JUDD LLOYD, M.D.,

Respondent.

Case No. 21-6457-1

**FILED** 

MAY 2 6 2021

NEVADA STATE BOARD OF MEDICAL EXAMINERS

## **COMPLAINT**

The Investigative Committee<sup>1</sup> (IC) of the Nevada State Board of Medical Examiners (Board), by and through Donald K. White, J.D., Deputy General Counsel and attorney for the IC, having a reasonable basis to believe that William Judd Lloyd, M.D. (Respondent) violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical Practice Act), hereby issues its Complaint, stating the IC's charges and allegations as follows:

- 1. Respondent was at all times relative to this Complaint a medical doctor licensed to practice medicine in the State of Nevada (License No. 4370). Respondent was originally licensed by the Board on July 11, 1981 and is currently in expired license status.
- 2. The IC of the Board issued an Order for Appearance (Order) on January 2, 2018, requiring Respondent to appear before the IC on February 23, 2018 at 11:30 a.m. This Order was sent to Respondent via USPS Certified Mail, Receipt No. 9171969009350040578719.
- 3. The Order was delivered to Respondent's last known registered address on January 5, 2018, with signature confirmation.
  - 4. Respondent did not appear, as ordered by the IC, at the February 23, 2018 meeting.

<sup>&</sup>lt;sup>1</sup> 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., Mr. M. Neil Duxbury, and Aury Nagy, M.D.

#### **COUNT I**

# NRS 630.3065(2)(a): Knowing and Willful Failure to Comply With Board Order

- 1. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 2. NRS 630.3065(2)(a) provides that knowingly or willfully failing to comply with an order of a committee designated by the Board to investigate a complaint against a physician, i.e., the IC, is grounds for initiating disciplinary action.
- 3. Respondent knowingly and willingly failed to comply with the IC's Order to appear at the IC meeting held on February 23, 2018 as ordered, after the IC mailed said Appearance Order via certified mail, with signature confirmation that Respondent did receive it.
- 4. By reason of the foregoing, Respondent is subject to discipline by the Nevada State Board of Medical Examiners as provided in NRS 630.352.

## WHEREFORE, the Investigative Committee 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 determines there has been a violation or violations of the Medical Practice Act committed by Respondent;
- 4. That the Board award fees and costs for the investigation and prosecution of this case as outlined in NRS 622.400;
- 5. 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

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1	6. That the Board take such other and further action as may be just and proper in thes
2	premises.
3	DATED this <u>26<sup>th</sup></u> day of <u>May</u> , 2021.
4	INVESTIGATIVE COMMITTEE OF THE
5	NEVADA STATE BOARD OF MEDICAL EXAMINERS
6	By:
7	DONALO K. WHITE, J.D.  Deputy General Counsel
8	9600 Gateway Drive
9	Reno, NV 89521 Tel: (775) 688-2559
10	Email: <u>dwhite@medboard.nv.gov</u> Attorney for the Investigative Committee
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1	VERIFICATION
2	STATE OF NEVADA )
3	: ss. COUNTY OF WASHOE )
4	Mr. M. Neil Duxbury, having been duly sworn, hereby deposes and states under penalty of
5	perjury that he is the Chairman of the Investigative Committee of the Nevada State Board of
6	Medical Examiners that authorized the Complaint against the Respondent herein; that he has read
7	the foregoing Complaint; and that based upon information discovered in the course of the
8	investigation into a complaint against Respondent, he believes that the allegations and charges in
9	the foregoing Complaint against Respondent are true, accurate and correct.
10	DATED this <u>26<sup>th</sup></u> day of <u>May</u> , 2021.
11	INVESTIGATIVE COMMITTEE OF THE
12	NEVADA STATE BOARD OF MEDICAL EXAMINERS
13	By: M. NEIL TYMBURY
14	M. NEIL DUXBURY
15	Chairman for the Investigative Committee
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