

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

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4
5 **In the Matter of Charges and Complaint**

Case No. 23-11427-1

6 **Against:**

FILED

7 **CHIHUANG EDWARD YEE, M.D.,**

AUG 18 2023

8 **Respondent.**

NEVADA STATE BOARD OF
MEDICAL EXAMINERS
By: Amale

9
10 **COMPLAINT**

11 The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners
12 (Board), by and through Ian J. Cumings, Deputy General Counsel and attorney for the IC, having
13 a reasonable basis to believe that Chihuang Edward Yee, M.D. (Respondent) violated the
14 provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code
15 (NAC) Chapter 630 (collectively, the Medical Practice Act), hereby issues its Complaint, stating
16 the IC's 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. 7830). Respondent was
19 originally licensed to by the Board on June 18, 1996. Respondent's specialty is listed on the
20 Board's website as Ophthalmology.

21 2. Patient A² was a fifty-nine (59) year-old male at the time of the events at issue.

22 3. On May 3, 2019, Patient A presented to Respondent with complaints of decreased
23 vision. Respondent diagnosed Patient A with a cataract on Patient A's left eye and recommended
24 corrective surgery with an intraocular lens implant.

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27 ¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time this formal
28 Complaint was authorized for filing, was composed of Board members Victor M. Muro, M.D., Chowdhury H. Ahsan,
M.D., Ph.D., FACC, and Ms. Pamela J. Beal.

² Patient A's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

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

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

4 1. That the Board give Respondent notice of the charges herein against him and give
 5 him notice that he may file an answer to the Complaint herein as set forth in
 6 NRS 630.339(2) within twenty (20) days of service of the Complaint;

7 2. That the Board set a time and place for a formal hearing after holding an Early
 8 Case Conference pursuant to NRS 630.339(3);

9 3. That the Board determine what sanctions to impose if it determines there has been
 10 a violation or violations of the Medical Practice Act committed by Respondent;

11 4. That the Board award fees and costs for the investigation and prosecution of this
 12 case as outlined in NRS 622.400;

13 5. That the Board make, issue and serve on Respondent its findings of fact,
 14 conclusions of law and order, in writing, that includes the sanctions imposed; and

15 6. That the Board take such other and further action as may be just and proper in these
 16 premises.

17 DATED this 18th day of August, 2023.

18 INVESTIGATIVE COMMITTEE OF THE
 19 NEVADA STATE BOARD OF MEDICAL EXAMINERS

20 By: 

21 IAN J. CUMINGS
 22 Deputy General Counsel
 23 9600 Gateway Drive
 24 Reno, NV 89521
 25 Tel: (775) 688-2559
 26 Email: icumings@medboard.nv.gov
 27 *Attorney for the Investigative Committee*
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VERIFICATION

STATE OF NEVADA)
 : ss.
COUNTY OF CLARK)

Victor M. Muro, 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 authorized the Complaint against the Respondent herein; that he has read the foregoing Complaint; and that based upon information discovered in the course of the investigation into a complaint against Respondent, he believes that the allegations and charges in the foregoing Complaint against Respondent are true, accurate and correct.

DATED this 18th day of August, 2023.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 
VICTOR M. MURO, M.D.
Chairman of the Investigative Committee