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DISTRICT COURT

CLARK COUNTY, NEVADA

FILED
2001 MAR 14 P 12:10

SHERYL D. BABYAK, DVM;

Petitioner,

vs.

NEVADA STATE BOARD OF VETERINARY MEDICAL EXAMINERS

Respondents.

Case No. A-411091
Dept. No. III

DECISION AND ORDER

THIS COURT, after reviewing all pleadings and papers included in the record on appeal herein, as well as the arguments presented by counsel at the hearing on the Petitions for Judicial Review on the sixteenth (16th) day of January, 2001, hereby finds the following;

I. The Circumstances Of This Case Exhibit That Dr. Babyak's Due Process Right To An Impartial Tribunal Was Violated By The Nevada State Board Of Veterinary Medical Examiners.

As a preliminary matter, Petitioner claims that the provision of NRS 638.147(10) which required Dr. Babyak to pay all costs incurred by the Board in the subject disciplinary proceedings is unconstitutional because the Board has executive responsibility over its finances and was therefore tempted to find Dr. Babyak guilty of the cited offenses so the Board could recover its costs. However, the State correctly maintains that even in the face of attack, "every favorable presumption and intendment will be brought to bear in support of constitutionality" of a statute

ASSEMBLY COMMERCE & LABOR
DATE: 5/9/03 ROOM: 4100 EXHIBIT F
SUBMITTED BY: ADAM LEVINE

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C.C. Client
Date 3/14/01

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or regulation. State v. Glusman, 98 Nev. 412, 419 (1982).

A party challenging a decision of an administrative agency for alleged bias "must overcome a presumption of honesty and integrity in those serving as adjudicators." Withrow v. Larkin, 421 U.S. 25 (1975). To establish a due process violation based on the alleged structural bias of the decision maker, a party generally must identify either "(1) direct, personal, substantial pecuniary interest by the decision maker in the proceedings; and (2) circumstances which, because of [the decision maker's] institutional responsibilities, would have so strong a motive to rule in a way that would aid the institution." Alpha Epsilon Phi Tau Chapter Housing Ass'n v. City of Berkeley, 114 F.3d 840 (9th Cir. 1997). However, even in the absence of a direct pecuniary interest in the outcome of the proceedings on the part of the decision maker, an unconstitutional combination of both executive and judicial functions may still exist. The test is:

> "[w]hether the... situation is one which would offer a possible temptation to the average man as a judge to forget the burden of proof required to convict the defendant, or which might lead him not to hold the balance, nice, clear and true between the state and the accused."

See In Re: Ross and Flangas, 99 Nev. 1, 14 (1983); *citing* Tumey v. Ohio, 273 U.S. 510, 532 (1927); Ward v. City of Monroeville, 409 U.S. 57, 60 (1972).

In this case, Dr. Babyak claims that by statute, the Board must operate on the basis of a fiscal year pursuant to NRS 638.085. Any payments made by the Board may only be made by a written order of the President of the Board under NRS 638.080(2). Accordingly, pursuant to NRS 638.073(3)(d), the Board is empowered to purchase or rent office space, equipment and supplies in order to carry out its various functions. All reasonable expenses incurred by the Board in carrying out these provisions must be paid from the money the Board receives from

licensees. *See* NRS 638.1473(1). Among the other expenses which the Board may pay from the monies which it receives from licensees is a salary of up to $80.00 per day for the Board members as well as a per diem allowance for their travel expenses. *See* NRS 638.040(a) and (b). However, the Board may only pay its salaries and expenses if it receives sufficient monies from licensees to cover such expenses. *See* NRS 638.040(3).

While other money received by the Board from licensees must be deposited in qualified banks or savings and loan associations located in the State of Nevada and paid out to satisfy these aforementioned expenses under NRS 638.1473(2), all money collected directly by the board from the imposition of fines must be deposited with the state treasurer for credit to the state general fund. *See* NRS 638.1473(2). In fact, no part of the Board's salaries or expenses may be paid out of the state general fund except as permitted by the interim finance committee to pay attorney's fees or the costs of an investigation under NRS 638.1473(4). Accordingly, the Court finds that the underlying statutory scheme is not unconstitutional with respect to NRS 638.1473, as there is clearly no direct pecuniary benefit on the part of the Board as a result of imposing fines on its licensees.

Notwithstanding this Court's decision regarding the constitutionality of NRS 638.147(10) and whether the Board members enjoy a direct pecuniary benefit under this section, the Court nonetheless finds that Petitioner has satisfied her burden overcoming the presumption of a lack of bias or prejudice of Board's members as applied in this case. Indeed, Dr. Babyak also claims that the Board's temptation to recover their costs is evidenced by statements made by Board members during the hearing, specifically Dr. Wilson, who specifically stated the necessity of the Board recovering its costs of this investigation. Additionally, Dr Babyak cites a letter sent to her

by the Board via Deputy Attorney General Louis Ling on August 24, 1999, which threatened that if she did not enter into a consent decree admitting she was incompetent, and agree to pay the Board's legal fees in the amount of $5,000, the resulting disciplinary hearing would subject Dr. Babyak to paying attorney's fees and costs as high as $15,000. Taken together, the Court finds that the statements by Dr. Wilson, as well as the Mr. Ling's letter dated August 24, 1998 evidence, at the very least, a situation "which would offer a possible temptation to the average man as a judge to forget the burden of proof required to convict the defendant, or which might lead him not to hold the balance, nice, clear and true between the state and the accused." *See* In Re: Ross and Flangas, supra, 99 Nev. at 14; Tumey v. Ohio, 273 U.S. at 532; Ward v. City of Monroeville, 409 U.S. at 60. Consequently, the Court finds that Dr. Babyak's Due Process right to an impartial tribunal was in fact violated by the Board's actions, and the Board's decision in this case must be set aside for this reason.

II. The Board's Convictions Of Dr. Babyak Must Be Set Aside Because The Board Applied The Wrong Burden Of Proof.

Pursuant to NRS 233B.135(3)(c), the decision of an administrative agency may be set aside if the rights of a petitioner have been prejudiced because the agency's decision was based upon "unlawful procedure." Mishler v. State Board of Medical Examiners, 109 Nev. 287, 292 (1993). In this case, Petitioner argues that the Board's findings must be reversed because they were based upon unlawful procedure in that the Board applied the wrong standard of proof. The record on appeal clearly establishes that during a closed session on September 29, 1999, the Board relied upon the legal guidance of Deputy Attorney General Sara Price, who repeatedly advised the Board members prior to making their findings of fact, the applicable standard of

proof was "substantial evidence." However, in disciplinary proceedings before the Board of Veterinary Medical Examiners, NRS 638.145 provides that the applicable standard of proof that must be met before discipline may be imposed on a veterinarian is **"satisfactory proof."** Respondent claims that this term does not evidence any legislative intent to substitute a separate standard of proof in place of the "substantial evidence" standard set forth under NRS 233B121(8). However, the applicable rules of statutory construction provide that words are to be given their plain meaning unless that violates the spirit of the act; no language shall be rendered surplusage; and no provision or clause should be rendered meaningless. *See* Estate of Thomas, 116 Nev.Adv.Op. No. 57 (2000).

In this case, it is clear that the Board in fact applied the wrong standard of proof, as its findings must be based on "satisfactory proof" under NRS 638.145. Consequently, the Court determines that the Board's findings with respect to Dr. Babyak must be set aside.

III. The State Board Of Veterinary Medical Examiners Violated Petitioner's Due Process Rights By Failing To Comply With The Notice Requirements Of The Nevada Revised Statutes, Chapter 638.

The Nevada State Board of Veterinary Medical Examiners must comply with the applicable notice requirements set forth in the Nevada Revised Statutes, Chapter 638, prior to the initiation of disciplinary action against a holder of a veterinary medical license. Pursuant to NRS 638.1413(3), the executive director shall send written notice by certified mail with return receipt requested to the person being investigated. The Notice must contain the name of the person who filed the complaint against the licensee, the nature of the complaint and a request for any medical records the licensee may have relating to the complaint.

Upon receipt of notice of the investigation, pursuant to NRS 638.1419(1), the Board is required to appoint one of its members to conduct the investigation of a complaint. Immediately after his appointment, the member conducting the investigation shall notify the person being investigated by telephone or by certified mail with return receipt requested. NRS 638.1419(2). The member conducting the investigation shall describe the reasons for the investigation. NRS 638.1419(2).

In this case, the Court finds that Respondent Nevada State Board of Veterinary Medical Examiners violated the notice requirements of both NRS 638.1413 and NRS 638.1419. The record on appeal reveals that on March 10, 1998, Frankie Payne filed a Verified Consumer Complaint against Dr. Kleinman alleging that Dr. Kleinman failed to properly treat "Pepper," Ms. Payne's two and a half year old dalmatian. In May, 1998, Petitioner Dr. Babyak, a consultant in Pepper's case, was notified by the Board that she was being named as a witness in the proceedings against Dr. Kleinman as well as **"another veterinarian."** Accordingly, the Board advised Dr. Babyak to turn over all her original medical records regarding Pepper. Dr. Babyak cooperated fully with the Board's requests that she turn over all medical records regarding Pepper, submitting those records with notice that she was being named as a witness only. Dr. Babyak supplemented these records on May 20, 1998. On June 26, 1998, the Board thanked Dr. Babyak for her cooperation in this matter. A verified complaint was never filed against the Dr. Babyak by Ms. Payne, nor was Dr. Babyak ever notified that she was the subject of any investigation by the Board at the time the request for medical records was made pursuant to NRS 638.1413(3).

It was not until July, 1998, that Dr. Babyak was informed that the Board's investigation of Dr. Kleinman raised some concerns regarding her involvement in the case as a second veterinarian. She was informed that there would be a subsequent investigation, with Dr. Chumrau and Dr. Kirk to be the Board investigators in her case. However, the letter notifying Dr. Babyak of the investigation failed to describe the reasons for the investigation as required under NRS 638.1419(2).

Under NRS 638.1429, if the member of the Board conducting the investigation determines that there is a reasonable basis for a Complaint, he is required to submit a written statement of findings. In this case, neither Dr. Chumrau nor Dr. Kirk submitted such a written statement of findings. Nonetheless, on October 12, 1998, the Board served Dr. Babyak with a Notice of Hearing for disciplinary charges against her. However, this Notice did not include a copy of the written statement of findings against Dr. Babyak. On March 11, 1999, the Board finally filed an Accusation against Dr. Babyak as required pursuant to NAC 638.240. The Accusation set forth the following four causes of action against Dr. Babyak: (1) incompetence as a general practitioner under NRS 638.140(5); or alternatively (2) incompetence as an American College of Veterinary Internal Medicine (hereinafter "ACVIM") diplomate under NRS 638.140(5); (3) that Dr. Babyak violated two of the Guidelines of Professional Behavior set forth under the American Veterinary Medical Association (hereinafter "AVMA") Code of Ethics; and (4) records keeping violations under NAC 638.037.

In this case, the Court is particularly troubled with the manner in which the Board advised Dr. Babyak to turn over her medical records regarding Pepper. It is clear from the record on appeal that the Board requested these records from Dr. Babyak for use in the proceedings

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against Dr. Kleinman. In fact, Dr. Babyak was notified by the Board that she was merely to be a witness in that proceeding. Dr. Babyak apparently made a good faith effort to comply with the Board's requests, and in fact, on June 26, 1998, the Board even thanked Dr. Babyak for her cooperation in this matter. However, despite the Board's failure to comply with the notice requirements of NRS 638, the Board nonetheless used these records Dr. Babyak turned over in good faith in subsequent disciplinary proceedings against her. Accordingly, the Court hereby finds that the conduct of the Board in this case substantially violated Dr. Babyak's procedural due process right to fair notice of the charges brought against her, and the Board's decision must therefore be set aside.

IV. The Board Was Prohibited From Initiating Disciplinary Proceedings Against Dr. Babyak As There Was No Finding Of Liability In A Civil Action For Malpractice Pursuant To NRS 638.140(5).

The 1995 amendment in effect at the time of the case against Dr. Babyak required that she first be held liable in an action for malpractice prior to the initiation of any disciplinary proceedings against her by the Board. NRS 638.140(5) provides the following, in pertinent part:

> The following acts, among others, are grounds for disciplinary action:
>
> (5) Incompetence, gross negligence **or other malpractice** pertaining to veterinary medicine as evidenced by an action for malpractice in which the holder of a license is found liable for damages.

(Emphasis Added).

In this case, the parties dispute whether the language of NRS 638.140(5) requires a finding of liability in a civil action prior to the Board's initiation of disciplinary proceedings in cases involving incompetence or gross negligence. The State of Nevada claims that the language

of the statute only requires such a finding of liability in cases of malpractice alone, and as the Complaint filed by the Board does not include charges of malpractice, the statute is inapplicable to this case. However, the plain language of the statute requires a finding of liability in a civil action in cases involving "[i]ncompetence, gross negligence **or other malpractice** pertaining to veterinary medicine." Thus, this Court disagrees with the State's position.

"It is well settled in Nevada that words in a statute should be given their plain meaning unless this violates the spirit of the act." Attorney General v. Board of Regents of the University and Community College System of Nevada, 114 Nev.Adv.Op. 50, p. 4 (April 9, 1998); *citing* McKay v. Board of Supervisors, 102 Nev. 644, 648 (1986). Accordingly, "[c]ourts must construe statutes... to give meaning to all of their parts and language.... The court should read each sentence, phrase, and word to render it meaningful within the context and purpose of the legislation." Attorney General v. Board of Regents, supra, 114 Nev.Adv.Op. at 3-4. Finally, "a fundamental rule of statutory interpretation is that the unreasonableness of the result produced by one among alternative possible interpretations of a statute is reason for rejecting that interpretation in favor of another that would produce a reasonable result." Hughes Properties, Inc. v. State of Nevada, 100 Nev. 295, 298 (1984).

This Court construes the phrase "or other malpractice" to mean that a finding of liability in a civil action is a prerequisite to the initiation of disciplinary proceedings in cases of "gross negligence," and more importantly with respect to the case at bar, "incompetence." The Court so construes this phrase to render it meaningful within the context and purpose of the statute. Indeed, the result of construing the statute to permit the Board to initiate disciplinary actions for "incompetence" or "gross negligence," charges involving stricter burdens of proof than a charge

of "malpractice," without the prerequisite finding of liability in a civil action would be certainly inconsistent with the plain language of the statute. Accordingly, the Court finds that the Board was in fact precluded from initiating disciplinary proceedings against Dr. Babyak under NRS 638.140(5), as no civil action had ever been commenced against Dr. Babyak with respect to her treatment of Pepper.

V. The Board's Finding Of Incompetence Against Dr. Babyak Was Not Supported By Substantial Evidence In The Record On Appeal.

The Nevada Supreme Court has recognized that due process may be violated where a doctor is disciplined by a licensing board for misconduct based upon facts which were never pled in the charging document. *See* Kassabian v. State Board of Medical Examiners, 68 Nev. 455 (1951); *also see*, Nevada State Board of Pharmacy v. Garrigus, 88 Nev. 277 (1972). In this case, it is clear from the record on appeal, the facts upon which the aforementioned charges were brought against Dr. Babyak were never adequately pled in accordance with the notice requirements of NRS 638.1419(2) and 638.1429, nor where these facts sufficiently set forth in the Accusation. However, that notwithstanding, this Court finds that the Board's decision to convict Dr. Babyak was not based upon the substantial evidence in the record.

Pursuant to NRS 638.1429(1), there must be proof of actual injury to an animal from a veterinarian's conduct unless the statement of findings under this section charges deceptive or unethical conduct. In the present case, Dr. Babyak was charged with "incompetence." A finding of proximate cause of any actual injury to Pepper would have been required in order to support a conviction against Dr. Babyak on this charge. However, the record on appeal clearly shows that a necropsy was never subsequently performed on Pepper that would have identified the cause of

her death. Thus, in the absence of any evidence of the specific medical cause of Pepper's death, there is no basis to support a finding that Dr. Babyak's decision not to perform any alternative diagnostic testing that may have revealed the presence of a diaphragmatic hernia was a proximate cause of Pepper's death.

The Board ultimately convicted Dr. Babyak based upon a finding that she failed to aggressively "monitor and manage" the care of Pepper after January 22, 1998. However, the Board failed to produce any witnesses who testified that the minimum standard of care required Dr. Babyak to recommend or perform any other diagnostic testing on Pepper, including serial radiographs, a complete blood count, chemistry panel, urinalysis and/or an electric cardiogram. Moreover, despite the Board's criticism of Dr. Babyak's recommendations regarding Pepper, even the prosecution's own expert, Dr. Matros, testified that Dr. Babyak's recommendations after her evaluation of Pepper did not fall below the applicable standard of care. The Nevada Supreme Court has held that in disciplinary actions before a licensing board, there must be expert testimony produced at the hearing to establish the standard of care or conduct which was allegedly breached. *See* Nevada State Board v. Garrigus, supra, 88 Nev. at 279.

Finally, the Board's conviction of Dr. Babyak was based upon a finding that she failed to aggressively "monitor and manage" the care of Pepper after January 22, 1998. However, Petitioner correctly argues that in order to do so, Dr. Babyak would have been required to obtain the consent of Dr. Kleinman, Pepper's treating veterinarian, pursuant to NAC 638.046. Thus, the Board's decision to convict Dr. Babyak on this basis was not supported by substantial evidence in the record.

VI. The Board's Conviction Of Dr. Babyak For Records Violations Under NAC 638.037 Was Not Supported By Substantial Evidence.

The Board ultimately convicted Dr. Babyak for a records violation under NAC 638.037. However, the Board's decision was based in part on Dr. Babyak's alleged failure to properly maintain written records of the medical services she provided to Pepper until four months later, on June 20, 1998, when Dr. Babyak supplemented these records in an effort to comply with the Board's document requests in the proceedings against Dr. Kleinman. There is no authority contained in NAC 638.037 that precludes Dr. Babyak from so supplementing her medical records. The State argues that the credibility of Dr. Babyak's supplemented records is suspect as these entries were made after Dr. Babyak was already made aware of the proceedings regarding Pepper. However, the Court finds this argument without merit as the document requests made by the Board were specifically concerning the proceedings against Dr. Kleinman, and the Board failed to give Dr. Babyak proper notice of any proceedings against her as required under NRS 638.1413 and NRS 638.1419.

The Board further found that Dr. Babyak violated this section by trailing her initial entry into the records without providing a date until the following page. Yet, there is no requirement under this section that a veterinarian place the date of a record at either the beginning or end of a record entry. A licensing board cannot impose professional discipline for conduct which is not actually prohibited by statute or regulations. *See* Tuna v. Board of Nursing, 593 P.2d 711 (Idaho 1979).

Accordingly, the Court finds that since the Board's decision regarding Dr. Babyak's alleged records violations is based upon findings that are not specifically prohibited by either

statute or regulation, the Board's decision was not based upon substantial evidence, and must be set aside for this reason.

VII. The Board's Conviction Of Dr. Babyak For A Violation Of The AVMA Code Of Ethics Must Be Set Aside As The Board's Findings Were Not Supported By Substantial Evidence.

Dr. Babyak was convicted of an ethical violation codified as NAC 638.046(1) which is set forth as Professional Behavior and Guidelines for Professional Behavior No. 7. Guideline No. 7 states that:

> "Veterinarians *should* strive continually to improve veterinary knowledge and skill making available to their colleagues the benefit of their professional attainments, and seeking, through consultation, assistance of others when it appears that the quality of veterinary service may be enhanced thereby."

(Emphasis Added).

Petitioner argues that this provision is simply an aspirational goal, and as such is unenforceable in a disciplinary proceeding. Petitioner further claims that this provision is nonetheless void for vagueness as it "fails to provide persons of ordinary intelligence with fair notice of what conduct is prohibited and also fails to provide law enforcement officials with adequate guidelines to prevent discriminatory enforcement." State of Nevada v. Father Richard, 108 Nev. 626, 629 (1992). However, notwithstanding Petitioner's claim as to the alleged vagueness of Guideline No. 7, the Court finds that the Board's decision on this issue simply is not supported by any substantial evidence in the record. Consequently, the Board's decision to convict Dr. Babyak on this charge is hereby set aside.

NOW THEREFORE, IT IS HEREBY ORDERED, that based upon the foregoing reasons, the Petition for Judicial Review is hereby GRANTED, and the Board's Findings are hereby REVERSED. It is further ordered that the Board's Order that Dr. Babyak pay the sum of $10,041.00 in fees and costs, and further setting the conditions of Dr. Babyak's probation are hereby VACATED.

DATED this 13 day of March, 2001.

RON PARRAGUIRRE

Ron D. Parraguirre
District Judge, Department III

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BEFORE THE NEVADA STATE BOARD OF
VETERINARY MEDICAL EXAMINERS

NEVADA STATE BOARD OF
VETERINARY MEDICAL EXAM.,

Petitioner,

v.

BRADLEY GILMAN DVM

Respondent,

_____/

AFFIDAVIT
RE: BOARD COSTS

Case Nos. 01-110498-665

I, Debbie Machen, under penalty of perjury do declare and say as follows:

1. I am the Executive Director for the Nevada State Board of Veterinary Medical Examiners.

2. I have examined all expenses that have been incurred, including but not limited to investigative, administrative, legal and board expenses.

3. I have attached an itemized summary of the total Board costs

4. Based upon the attached documents, the total costs to the Board for the investigation and prosecution of this action are $18093.00

Debbie Machen
DEBBIE MACHEN

SUBSCRIBED AND SWORN TO before me
This 7th day of January 2000 by
Debbie Machen.

Marjorie E. Smeltzer
NOTARY PUBLIC

MARJORIE E. SMELTZER
Notary Public, State of Nevada
Appointment No. 99-49951-2
My Appt. Expires Dec. 14, 2002

EXPENSE DATA TRACKING SHEET

SLENSKY VS GILMAN
01-110498-665

LEGAL	6630.00
EXPERT WITNESS	7611.00
ADMIN. COSTS	750.00
INVESTIGATIVE	375.00
BOARD COSTS	1737.00
COURT REPORTER	840.00
SUBPOENA SERVICE	150.00
TOTAL COSTS	18093.00

EXPENSE DATA TRACKING SHEET			
DISCIPLINARY HEARING/DECEMBER 13 & 14, 2000			
CASE			
SLENSKY VS GILMAN (01-110498-665)			
	HOURS	@	TOTAL
LEGAL	85.00	78.00	6630.00
(Louis Ling)			
ADMINISTRATIVE			750.00
meeting room-$273.00			
x-ray copies-$30.00			
airport parking-$24.00			
Chumrau-hearing-$300.00			
legal wings-$90.00			
certified mail-$33.00			
BOARD COSTS			1737.00
travel-$472.00			
otel-$429.00			
per diem &travel(Cannon)-$442.00			
meals-$394.00			
(9 people/2 days)			
INVESTIGATIVE COSTS	15.00	25.00	375.00
(Mike Chumrau, DVM)			
EXPERT REVIEW/WITNESS			7145.00
(Dr. James Wilson/expenses)			
SUBPOENA SERVICE			150.00
(Legal Wings)			
COURT REPORTER			840.00
(Laurie Webb & Assoc.)			
TOTAL COSTS			17627.00

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Bank of America Business Card Cardholder Activity

DEBBIE MACHEN
NV BOARD OF VETERINARY

Account Number:
4024 4900 0007 2907

Billing Date	01-09-00	Payment Due Date	02-03-00
Credit Limit	$10,000		
Cash Advance Balance	$00		
Available Credit	$10,000	Total Activity	$1,388.02

Bank of America News

CARDHOLDER ACTIVITY

Posting Date	Sale Date	Ref. No.	Transactions	Charge	Credit
12-16	12-14	22575	SOUTHWESTAIR5262702194672 DALLAS TX MACHEN/DEBBIE DEPARTURE 01/20 RNO WN Y LAS WN Y RNO	$79.00	
12-16	12-14	22583	SOUTHWESTAIR5262702194673 DALLAS TX FREDERICKSON/CONRAD DEPARTURE 01/20 RNO WN Y LAS WN Y RNO	$79.00	
12-16	12-14	31137	FAIRFIELD INN-LAS VEGAS LAS VEGAS NV 009 12150 ARRIVAL: 12-15-99	$115.17	
12-16	12-14	65249	Z'TEJAS GRILL LAS VEGAS NV	$139.41	
12-16	12-14	31145	FAIRFIELD INN-LAS VEGAS LAS VEGAS NV 010 12150 ARRIVAL: 12-15-99	$273.12 – meeting room	
12-23	12-20	00059	RAPSCALLION SEAFOOD RENO NV	$94.89	
01-07	01-05	00150	SAFEWAY #1512 RENO NV	$22.74	

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