

OFFICE OF THE GENERAL COUNSEL
Nevada State Board of Medical Examiners
1105 Terminal Way #301
Reno, Nevada 89502
(775) 688-2559

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

* * * * *

In the Matter of Charges and)
)
Complaint Against)
)
ARNOLD W. KLEIN, M.D.,)
)
Respondent.)

Case No. 15-31252-1

FILED

FEB 19 2015

NEVADA STATE BOARD OF
MEDICAL EXAMINERS

By: _____

COMPLAINT

The Investigative Committee (IC) of the Nevada State Board of Medical Examiners (Board), composed at the time of filing of Theodore B. Berndt, M.D., Valerie J. Clark, BSN, RHU, LUTCF, and Michael J. Fischer, M.D., by and through Erin L. Albright, Esq., General Counsel and attorney for the IC, having a reasonable basis to believe that Arnold W. Klein, 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 is currently licensed in active status (License No. 11881), and has been licensed by the Board since June 10, 2006, pursuant to the provisions of the Medical Practice Act.
2. At the times alleged herein, Respondent was also licensed to practice medicine in the state of California.
3. On or about July 19, 2012, the Medical Board of California filed an Accusation against Respondent alleging one count of failure to comply with an order to undergo a mental and physical examination and one count of unprofessional conduct.
4. On or about October 17, 2013, Respondent submitted a reinstatement application to the Board. On this application, Respondent answered “no” to reinstatement Question #11, which reads: “Have you been: a) asked to respond to an investigation; b) notified that you were under

1 investigation for; c) investigated for; d) charged with; or e) convicted of any violation of a statute,
2 rule or regulation governing your practice as a physician by any medical licensing board, hospital,
3 medical society, governmental entity or other agency other than the Nevada State Board of
4 Medical Examiners?”

5 5. Since the Medical Board of California filed an Accusation against Respondent on
6 or about July 19, 2012, Respondent should have answered “yes” to reinstatement Question #11 on
7 his application.

8 6. NRS 630.304(1) provides that obtaining, maintaining or renewing or attempting to
9 obtain, maintain or renew a license to practice medicine by bribery, fraud or misrepresentation or
10 by any false, misleading, inaccurate or incomplete statement is grounds for initiating discipline
11 against a licensee.

12 7. Since Respondent answered “no” to reinstatement Question #11 on his
13 reinstatement application, Respondent was attempting to obtain, maintain or renew his Nevada
14 medical license by bribery, fraud or misrepresentation or by any false, misleading, inaccurate or
15 incomplete statement.

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

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

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

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

24 3. That the Board determine the sanctions it will impose if it finds Respondent
25 violated the Medical Practice Act;

26 4. That the Board make, issue and serve on Respondent, in writing, its findings of
27 fact, conclusions of law and order, which shall include the sanctions imposed; and

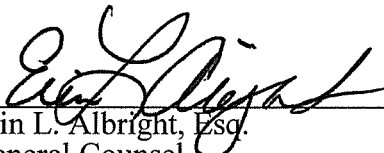
28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

DATED this 19th day of February, 2015.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 
Erin L. Albright, Esq.
General Counsel
Attorney for the Investigative Committee

VERIFICATION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

STATE OF NEVADA)
 : ss.
COUNTY OF WASHOE)

Theodore B. Berndt, M.D., hereby deposes and states under penalty of perjury under the laws of the state of Nevada that he is the Chairman of the Investigative Committee of the Nevada State Board of Medical Examiners that authorized the foregoing Complaint against the Respondent herein; that he has read the foregoing Complaint; and based upon information discovered during the course of the investigation into a complaint against Respondent, he believes the allegations and charges in the foregoing Complaint against Respondent are true, accurate and correct.

Dated this 19th day of February, 2015.

Theodore B. Berndt
Theodore B. Berndt, M.D.

OFFICE OF THE GENERAL COUNSEL
Nevada State Board of Medical Examiners
1105 Terminal Way #301
Reno, Nevada 89502
(775) 688-2559


1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 19th day of February 2015; I served a filed copy of COMPLAINT & FINGERPRINT INFORMATION, via USPS certified return receipt mail to the following:

Arnold Klein, M.D.
9615 Brighton Way, Ste. M-110
Beverly Hills, CA 90210

Dated this 19th day of February, 2015.



Angelia L. Donohoe
Legal Assistant