

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

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6 **In the Matter of Charges and**)
7 **Complaint Against**)
8 **JAN MEYER THOMPSON, M.D.,**)
9)
10 **Respondent.**)

Case No. 15-11459-1

FILED

NOV 18 2015

NEVADA STATE BOARD OF
MEDICAL EXAMINERS

By: _____

11 **COMPLAINT**

12 The Investigative Committee (IC)¹ of the Nevada State Board of Medical Examiners
13 (Board) by and through Erin L. Albright, Esq., Board General Counsel and attorney for the IC,
14 hereby issues this formal Complaint (Complaint) against Jan Meyer Thompson, M.D.
15 (Respondent), a licensed physician in Nevada. After investigating this matter, the IC has a
16 reasonable basis to believe Respondent has violated provisions of Nevada Revised Statutes (NRS)
17 Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical
18 Practice Act). The IC's allegations and charges are as follows:

19 1. Respondent was originally licensed by the Board pursuant to the Medical Practice
20 Act on December 30, 1996 (License No. 8065). On September 15, 2015, Respondent's license to
21 practice medicine in Nevada was indefinitely summarily suspended.

22 2. Respondent was offered employment as a physician with Human Behavior Institute
23 (HBI) in Las Vegas, Nevada. Since Respondent lived in Reno, Nevada, HBI agreed to pay for
24 Respondent's airfare from Reno to Las Vegas and her hotel stay in Las Vegas until
25 Respondent could secure permanent housing. HBI also paid for Respondent's medical license
26 renewal in Nevada.

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¹ At the time of authorizing the filing of this Complaint, the IC was composed of Beverly A. Neyland, M.D., Bashir Chowdhry, M.D. and Sandy Peltyn.

OFFICE OF THE GENERAL COUNSEL

Nevada State Board of Medical Examiners

1105 Terminal Way #301

Reno, Nevada 89502

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1 3. Respondent was scheduled to attend employee orientation for HBI in Las Vegas,
2 Nevada, from June 25, 2015 through June 26, 2015.

3 4. Respondent was scheduled to start work with HBI on June 29, 2015.

4 5. Respondent attended the employee orientation, where she received one prescription
5 pad containing 50 blank prescriptions.

6 6. On June 29, 2015, Respondent failed to report for work with HBI. HBI contacted
7 the hotel where Respondent was staying in an attempt to locate Respondent. At this time, HBI
8 discovered that Respondent had charged approximately \$1,000.00 in bar charges during her stay.

9 7. On June 30, 2015, HBI terminated Respondent's stay at the hotel and her employment
10 with HBI.

11 8. On July 1, 2015, Respondent presented herself at HBI announcing she was there to
12 work as a physician. Respondent was immediately asked to surrender her prescription pad and leave
13 the premises. Respondent denied having a prescription pad but did leave the premises.

14 9. A review of Respondent's criminal history revealed that Respondent was arrested by
15 the Reno Police Department (RPD) on February 22, 2008, for driving under the influence of
16 controlled substances. On February 22, 2012, Respondent was arrested by RPD for driving under the
17 influence of alcohol. On March 13, 2013, Respondent was arrested by RPD for petit larceny and
18 transferred to the Washoe County Sherriff's Office because she was grossly intoxicated and did not
19 qualify for a misdemeanor citation. On April 15, 2015, Respondent was arrested by RPD for trespass
20 and transferred to the Washoe County Sherriff's Office because she was grossly intoxicated and did
21 not qualify for a misdemeanor citation.

22 10. Respondent was also arrested by the Washoe County Sheriff's Department on
23 November 27, 2014, on an active outstanding warrant for failure to comply issued by Reno
24 Municipal Court. At the time of the arrest, a preliminary breath test showed Respondent's blood
25 alcohol content was .158.

26 11. On July 9, 2015, Respondent's elderly mother filed a missing person report with the
27 North Las Vegas Metropolitan Police Department (NLVMPD). The report stated the mother last

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1 spoke with Respondent two weeks earlier and that Respondent, who is homeless, unemployed and
2 suffers from an alcohol problem, was acting unstable.

3 12. On July 22, 2015, NLVMPD was dispatched to Shade Tree, 1 West Tree, in reference
4 to a sexual assault report it received from Centennial Hills Hospital. The alleged victim was
5 Respondent. Respondent initially informed NLVMPD that she was raped; however, when pressed to
6 provide details and submit to a sexual assault kit, Respondent rescinded her allegations of rape and
7 refused further help.

8 13. A review of Respondent's medical records from Centennial Hills Hospital
9 demonstrated that on July 19, 2015, Respondent presented to the emergency department of
10 Centennial Hills Hospital alleging she was the victim of a rape. However, when the hospital staff
11 wanted to call NLVMPD to report the incident, Respondent asserted she was lying about being raped
12 but did need to be treated for heart palpitations. While waiting to be treated, Respondent opened a
13 beer and began drinking the beer in the emergency department of the hospital. Hospital staff
14 educated Respondent on the hospital's no drinking policy and took the beer and a bottle of wine from
15 Respondent. During this visit, hospital staff located an HBI prescription pad in Respondent's
16 possession. The staff contacted HBI and learned that the prescription pad was reported stolen. The
17 staff confiscated the prescription pad but noted that 17 prescriptions were missing from the
18 prescription pad. Hospital staff contacted NLVMPD to transport Respondent to the University
19 Medical Center for a rape kit, but Respondent left Centennial Hills Hospital before the transfer could
20 be completed. Hospital staff noted that Respondent was unkempt, unclean and appeared homeless.

21 14. On her 2015 Nevada medical license renewal application, Respondent failed to
22 disclose that she was arrested on April 15, 2015.

23 **COUNT I**

24 15. All of the allegations in the above paragraphs are hereby incorporated as if fully set
25 forth herein.

26 16. NRS 630.304(1) provides that obtaining, maintaining or renewing or attempting to
27 obtain, maintain or renew a license to practice medicine by bribery, fraud or misrepresentation or

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1 by any false, misleading, inaccurate or incomplete statement is grounds for initiating discipline
2 against a licensee.

3 17. By failing to disclose the fact that she was arrested by RPD for trespass on April
4 15, 2015 on her Nevada medical license renewal application, Respondent was obtaining,
5 maintaining or renewing or attempting to obtain, maintain or renew her license to practice
6 medicine by fraud, misrepresentation or any false, misleading, inaccurate or incomplete statement.

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

9 **COUNT II**

10 19. All of the allegations in the above paragraphs are hereby incorporated as if fully set
11 forth herein.

12 20. NRS 630.306(2)(a) provides that engaging in any conduct which is intended to
13 deceive is grounds for initiating discipline against a licensee.

14 21. Respondent's aforementioned activities constitute conduct which was intended to
15 deceive.

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

18 **COUNT III**

19 23. All of the allegations in the above paragraphs are hereby incorporated as if fully set
20 forth herein.

21 24. NRS 630.301(9) provides that engaging in conduct that brings the medical
22 profession into disrepute is grounds for initiating discipline against a licensee.

23 25. As outlined above, Respondent's acts of impersonating an HBI physician is
24 conduct that brings the medical profession into disrepute.

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

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COUNT IV

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

28. NRS 630.306(8) provides that habitual intoxication from alcohol or dependency on controlled substances is grounds for initiating discipline against a licensee.

29. Based on, but not limited to, the foregoing facts, Respondent suffers from habitual intoxication from alcohol or dependency on controlled substances.

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

WHEREFORE, the Investigative Committee prays:

1. That the Board give Respondent notice of the charges herein against her and give her notice that she 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 the sanctions it will impose if it finds Respondent violated the Medical Practice Act;

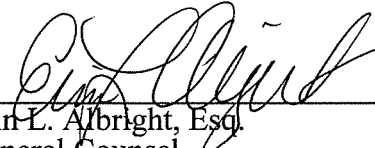
4. That the Board make, issue and serve on Respondent, in writing, its findings of fact, conclusions of law and order, which shall include the sanctions imposed; and

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

DATED this 18th day of November, 2015.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: _____


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

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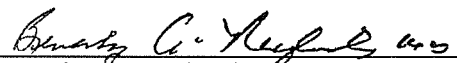
VERIFICATION

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STATE OF NEVADA)
 : ss.
COUNTY OF CLARK)

Beverly A. Neyland, M.D., hereby deposes and states under penalty of perjury under the laws of the state of Nevada that she 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 she has read the foregoing Complaint; and based upon information discovered during the course of the investigation into a complaint against Respondent, she believes the allegations and charges in the foregoing Complaint against Respondent are true, accurate and correct.

Dated this 18th day of November, 2015.



Beverly A. Neyland, M.D.