


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

* * * * *

**In the Matter of Charges and
Complaint Against
Chad Kruger, RRT,
Respondent.**

Case No. 17-23950-1

FILED
SEP 25 2017
NEVADA STATE BOARD OF
MEDICAL EXAMINERS
By: 

COMPLAINT

The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners (Board) hereby issues this formal Complaint (Complaint) against Chad Kruger (Respondent), a licensed Registered Respiratory Therapist (RRT) in Nevada. After investigating this matter, the IC has a reasonable basis to believe that Respondent has violated provisions of Nevada Revised Statutes (NRS) chapter 630 and Nevada Administrative Code (NAC) chapter 630 (collectively, Medical Practice Act). The IC alleges the following facts:

A. Respondent's Licensure Status

1. Respondent is currently licensed in Nevada in active status (License No. RC214), and has been so licensed by the Board since December 3, 2001.

B. Respondent's Disreputable Conduct

2. On or about July 31, 2013, Respondent was indicted by a Grand Jury in Clark County, Nevada, along with two other individuals, on charges of: Insurance Fraud Committed to Promote Activities of a Criminal Gang, a felony; Theft Committed to Promote Activities of a Criminal Gang, a felony; Conspiracy, a gross misdemeanor. The charges stem from Respondent's involvement in a conspiracy to fake the theft of a Suzuki motorcycle belonging to one of the other defendants, and report it stolen to an insurance company to obtain an insurance settlement

¹ The Investigative Committee (IC) of the Nevada State Board of Medical Examiners (Board) was composed of Board members Wayne Hardwick, M.D., Chairman, Theodore B. Berndt, M.D., member and M. Neil Duxbury, public member.

1 by fraud. The criminal allegations do not involve the practice of medicine.

2 3. On August 31, 2015, Respondent plead guilty to one count of Insurance Fraud, a felony,
3 and agreed to pay restitution to various parties totaling \$10,570.37.

4 4. On February 1, 2016, upon substantial satisfaction of the aforementioned punishment, the
5 indictment was amended to a single count of Conspiracy to Commit Insurance Fraud, a gross
6 misdemeanor, to which Respondent pled guilty, and a final judgment was rendered on April 21,
7 2016.

8 5. Accordingly, Respondent, a licensed RRT in active practice in the State of Nevada, was
9 convicted of Insurance Fraud, a gross misdemeanor.

10 **Count I**

11 **NRS 630.301(9) (Disreputable Conduct)**

12 6. All of the allegations in the above paragraphs are hereby incorporated by reference as
13 though fully set forth herein.

14 7. Conduct that brings the medical profession into disrepute is grounds for discipline
15 pursuant to NRS 630.301(9), including, without limitation, conduct that violates any provision of
16 a code of ethics adopted by the Board by regulation based on a national code of ethics.

17 8. Respondent's participation in a criminal conspiracy to commit insurance fraud, and a
18 criminal conviction for such, constitutes engaging in conduct that brings the medical profession
19 into disrepute.

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

22 **WHEREFORE**, the IC prays that the Board:

- 23 1. Give Respondent notice of the charges set forth in this Complaint;
24 2. Give Respondent notice that Respondent may file an answer to the Complaint as set forth
25 in NRS 630.339(2) within 20 days of service of the Complaint;
26 3. Set a time and place for a formal hearing after holding an Early Case Conference pursuant
27 to NRS 630.339(3);

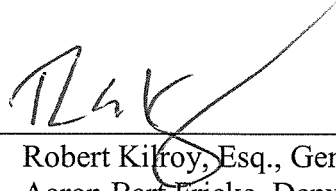
28 ///

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

- 4. Determine the sanctions it will impose if it finds Respondent violated the Medical Practice Act;
- 5. Make, issue, and serve on Respondent, in writing, its findings of fact, conclusions of law and order, which shall include the sanctions, if imposed; and
- 6. Take such other and further action as may be just and proper in this matter.

Dated this 22 day of September, 2017.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 
Robert Kilroy, Esq., General Counsel
Aaron Bart Fricke, Deputy General Counsel
Attorneys for the Investigative Committee

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

VERIFICATION


STATE OF NEVADA)

) ss.

COUNTY OF WASHOE)

Wayne Hardwick, 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 22nd day of September, 2017.


Wayne Hardwick, M.D.
Chairman, Investigative Committee
Nevada State Board of Medical Examiners

CERTIFICATE OF SERVICE

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

I hereby certify that I am employed by the Nevada State Board of Medical Examiners and that on the 25th day of September, 2017, I served a file-stamped copy of the COMPLAINT and FINGERPRINT INFORMATION, via USPS e-certified return receipt mail (9171 9690 0935 0096 2329 55) to the following:

Chad Kruger, RRT
3025 Cooper Creek Drive
Henderson, NV 89074

DATED this 25th day of September, 2017.



Kimberly Rosling, Employee