

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

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

\* \* \* \* \*

**In the Matter of Charges and** )  
 )  
**Complaint Against** )  
 )  
**JENNIFER McKIM WILSON, M.D.,** )  
 )  
**Respondent.** )

Case No. 14-21994-1

**FILED**

**OCT 16 2014**

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS

By: \_\_\_\_\_

**COMPLAINT**

The Investigative Committee (IC) of the Nevada State Board of Medical Examiners (Board), composed of Beverly A. Neyland, M.D., Bashir Chowdhry, M.D., and Sandy Peltyn, by and through Erin L. Albright, Esq., General Counsel and attorney for the IC, having a reasonable basis to believe that Jennifer McKim Wilson, 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. 10019), and has been so licensed by the Board since November 2, 2001, pursuant to the provisions of the Medical Practice Act.

2. Patient A was a twelve (12)-year-old female at the time of the incidents in question. Her true identity is not disclosed in this Complaint to protect her identity, but her identity is disclosed in the Patient Designation contemporaneously served on Respondent with this Complaint.

3. On or about March 25, 2012, Patient A presented to the emergency department of St. Mary's Regional Hospital (ER).

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1           4.       During this ER visit, a computerized tomography scan of Patient A's  
2 abdomen/pelvis was performed and interpreted by a radiologist as "small right pleural effusion;  
3 small amount of ascites; small cyst of the right kidney."

4           5.       During this ER visit, an abdominal ultrasound was performed and interpreted by a  
5 radiologist as "small amount of ascites; right pleural effusion."

6           6.       During this ER visit, blood work showed Patient A's total bilirubin was elevated at  
7 2.0, with aminotransferase of 205, alanin aminotransferase of 337 and alkaline phosphatase of 66.  
8 Patient A's white blood cell count was 13.1 with normal differential and elevated hemoglobin of  
9 15.4. Patient A had a decreased carbon dioxide level of 16 and a mildly elevated creatinine level  
10 of 1.13.

11           7.       On or about March 26, 2012, Patient A presented to the ER for the second day in a  
12 row with twenty-four (24) hours of new onset peripheral edema, a mildly diminished pulse  
13 oximetry, persistent tachycardia and a cough that has lasted for three (3) weeks.

14           8.       During this ER visit, Patient A was cared for and treated by Respondent.

15           9.       During this ER visit, Respondent reviewed the records from Patient A's March 25,  
16 2012 ER visit.

17           10.      Given the known presence of pleural effusion, ascites and transaminitis, coupled  
18 with laboratory evidence of renal insufficiency, Respondent should have considered congestive  
19 heart failure as the possible etiology of Patient A's symptoms.

20           11.      The standard diagnostic evaluation for possible congestive heart failure is a chest  
21 x-ray and electrocardiogram.

22           12.      Patient A's medical chart lacks any evidence demonstrating that Respondent  
23 ordered Patient A undergo a chest x-ray during Patient A's March 25, 2012 ER visit.

24           13.      Patient A's medical chart lacks any evidence demonstrating that Respondent  
25 ordered Patient A undergo an electrocardiogram during Patient A's March 25, 2012 ER visit.

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**COUNT I**

**(Medical Records Violation)**

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

5 15. NRS 630.3062(1) provides that the failure to maintain timely, legible, accurate and  
6 complete medical records relating to the diagnosis, treatment and care of a patient is grounds for  
7 initiating discipline against a licensee.

8 16. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed  
9 to maintain accurate and/or complete medical records relating to the diagnosis, treatment and care  
10 of Patient A when she failed to record in Patient A's medical records that he ordered Patient A  
11 undergo a chest x-ray.

12 17. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed  
13 to maintain accurate and/or complete medical records relating to the diagnosis, treatment and care  
14 of Patient A when she failed to record in Patient A's medical records that he ordered Patient A  
15 undergo an electrocardiogram.

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

**COUNT II**

**(Malpractice)**

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20 19. All of the allegations contained in the above paragraphs are hereby incorporated by  
21 reference as though fully set forth herein.

22 20. NRS 630.301(4) provides that malpractice of a physician is grounds for initiating  
23 disciplinary action against a licensee.

24 21. NAC 630.040 defines malpractice as the failure of a physician, in treating a patient,  
25 to use the reasonable care, skill, or knowledge ordinarily used under similar circumstances.

26 22. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed  
27 to use reasonable care, skill or knowledge ordinarily used under similar circumstances when she

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1 failed to order the necessary diagnostic testing (i.e., chest x-ray and electrocardiogram) to  
2 determine whether Patient A's symptoms resulted from congestive heart failure.

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

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

6 1. That the Board give Respondent notice of the charges herein against her and give  
7 her notice that sAAAnAnhe may file an answer to the Complaint herein as set forth in NRS  
8 630.339(2) within twenty (20) days of service of the Complaint;

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

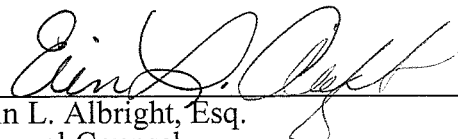
11 3. That the Board determine the sanctions it will impose if it finds Respondent  
12 violated the Medical Practice Act;

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

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

17 DATED this 10<sup>th</sup> day of October, 2014.

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

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22 By:   
23 Erin L. Albright, Esq.  
24 General Counsel  
25 Attorney for the Investigative Committee  
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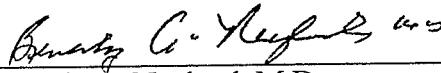
VERIFICATION

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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 Chairwoman 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 16<sup>th</sup> day of October, 2014.

  
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Beverly A. Neyland, M.D.

OFFICE OF THE GENERAL COUNSEL

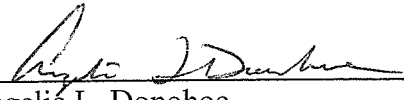
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CERTIFICATE OF SERVICE

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 17th day of October 2014; I served a filed copy of COMPLAINT, PATIENT DESIGNATION and FINGERPRINT INFORMATION, USPS e-certified return receipt mail to the following:

Jennifer McKim Wilson, M.D.  
280 Island Ave., Apt. 801  
Reno, NV 89501

Dated this 17<sup>th</sup> day of October, 2014.

  
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Angeli L. Donohoe  
Legal Assistant

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