

BEFORE THE BOARD OF MEDICAL EXAMINERS
OF THE STATE OF NEVADA

* * * * *

In the Matter of Charges and)
Complaint Against)
RYAN F. SIMONS, PA-C,)
Respondent.)

Case No. 16-38587-1

FILED

AUG 17 2016

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 Ryan F. Simons, PA-C, (Respondent), a licensed physician assistant 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, the Medical Practice Act).

The IC alleges the following facts:

1. Respondent is currently licensed in active status (License No. PA1272), and has been licensed by the Board since March 22, 2011. At all times alleged herein, Respondent was licensed in an active status by the Board pursuant to the provisions of the Medical Practice Act.

2. On or about December 27, 2014, the University Medical Center of Southern Nevada (UMC), pursuant to NRS 630.307, informed the Board regarding an investigation of Stuart Kaplan, M.D. (Kaplan) and that UMC Medical Executive Committee voted that Respondent was in violation of NRS 630.3062 and NAC 630.230 when UMC discovered that Kaplan's physician assistant (Respondent) was signing Kaplan's name on the progress notes of patients not seen by Kaplan.

¹ The Investigative Committee of the Nevada State Board of Medical Examiners is composed of Board members Beverly A. Neyland, M.D., Rachakonda Prabhu, M.D., and Ms. Sandy Peltyn.

OFFICE OF THE GENERAL COUNSEL
Nevada State Board of Medical Examiners
1105 Terminal Way #301
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5. That the Board take such other and further action as may be just and proper in these premises.

DATED this 17 day of August, 2016.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: Jasmine K. Mehta
Jasmine K. Mehta, Esq.
Deputy General Counsel for the Board
Attorney for the Investigative Committee

By: RCK
Robert Kilroy, Esq.
General Counsel for the Board
Attorney for the Investigative Committee


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 18th day of August, 2016.



Beverly A. Neyland, M.D.


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CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 18th day of August 2016; I served a file stamp copy of the COMPLAINT & fingerprint information, by mailing via USPS e-certified return receipt mail to the following:

Ryan F. Simons, PA-C
3061 S. Maryland Pkwy., Ste. 200
Las Vegas, NV 89109

Dated this 18th day of August, 2016.



Angelia L. Donohoe
Legal Assistant