

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

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 **STUART S. KAPLAN, M.D.,**)
9 **Respondent.**)

Case No. 16-28531-2

FILED

AUG 17 2016

NEVADA STATE BOARD OF
MEDICAL EXAMINERS
By: 

10 _____)
11 **COMPLAINT**

12 The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners
13 (Board) hereby issues this formal Complaint (Complaint) against Stuart S. Kaplan, M.D.
14 (Respondent), a licensed physician in Nevada. After investigating this matter, the IC has a
15 reasonable basis to believe that Respondent has violated provisions of Nevada Revised Statutes
16 (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the
17 Medical Practice Act).

18 The IC alleges the following facts:

19 1. Respondent is currently licensed in active status (License No. 10758), and has been
20 licensed by the Board since December 30, 2003. At all times alleged herein, Respondent was
21 licensed in an active status by the Board pursuant to the provisions of the Medical Practice Act.

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

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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.

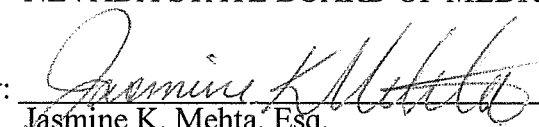
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4. That the Board make, issue and serve upon the Respondent, in writing, its findings of fact, conclusions of law and order, which shall include the sanctions imposed; and

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

DATED this 17 day of August, 2016.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

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

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

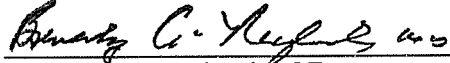
VERIFICATION

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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 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.

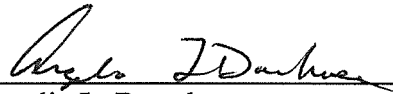
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CERTIFICATE OF MAILING

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, by mailing via USPS e-certified return receipt mail to the following:

John Cotton, Esq.
John H. Cotton & Associates, Ltd.
7900 W. Sahara, Ste. 200
Las Vegas, NV 89117

Dated this 18th day of August, 2016.



Angelia L. Donohoe
Legal Assistant