

BEFORE THE BOARD OF MEDICAL EXAMINERS  
OF THE STATE OF NEVADA

\* \* \* \* \*

In the Matter of Charges and )  
Complaint Against )  
Su Young Pak, M.D., )  
Respondent. )

Case No. 17-35720-1

FILED

MAR - 7 2017

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS

By: 

COMPLAINT

The Investigative Committee<sup>1</sup> (IC) of the Nevada State Board of Medical Examiners, having a reasonable basis to believe that Su Young Pak, M.D. (hereinafter referred to as Dr. Pak or Respondent), has 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 formal Complaint, stating the IC's charges and allegations, as follows:

Respondent's Licensure Status

1. Respondent is currently licensed in inactive status (License No. 13434). Respondent was issued his license from the Nevada State Board of Medical Examiners on March 5, 2010, pursuant to the provisions of NRS Chapter 630.

2. On March 21, 2016, the Medical Board of California issued a Decision and Order adopting a Stipulated Settlement and Disciplinary Order with Respondent (Case No. 04-2011-219511) for negligence in the treatment of a patient.

3. The Decision and Order became effective on April 20, 2016.

4. Respondent's California Physician and Surgeon's Certificate No. A34079 was revoked, which revocation was stayed and Respondent was placed on probation for two years.

<sup>1</sup> The Investigative Committee of the Nevada State Board of Medical Examiners, at the time the filing of this Complaint was approved, was composed of Wayne Hardwick, M.D., Theodore B. Berndt, M.D., and Mr. M. Neil Duxbury.

1 Respondent was also required to take no less than 40 hours of approved educational programs or  
2 courses during each year of probation and have a practice monitor for the first year of probation.

3 Respondent was prohibited from supervising physician assistants during the duration of probation.

4 5. Respondent reported the Medical Board of California's investigation regarding  
5 Respondent on Respondent's 2015 license renewal application.

6 6. Respondent did not report the Medical Board of California's Decision and Order to  
7 the Nevada State Board of Medical Examiners.

8 **Count I**

9 7. All of the allegations contained in the above paragraphs are hereby incorporated by  
10 reference as though fully set forth herein.

11 8. NRS 630.301(3) provides that any disciplinary action, including the revocation,  
12 suspension, modification or limitation of a license to practice any type of medicine, taken by  
13 another state, is grounds for initiating disciplinary action against a licensee.

14 9. On March 21, 2016, the Medical Board of California issued a Decision and Order  
15 adopting a Stipulated Settlement and Disciplinary Order with Respondent (Case No. 04-2011-  
16 219511) for negligence in the treatment of a patient, which is disciplinary action taken by another  
17 state.

18 10. By reason of the foregoing, Respondent is subject to discipline by the Nevada State  
19 Board of Medical Examiners as provided in NRS 630.352.

20 **Count II**

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

23 12. NRS 630.306(1)(k) provides that failure by a licensee or applicant to report in  
24 writing, within 30 days, any disciplinary action taken against the licensee or applicant by another  
25 state, the Federal Government or a foreign country, including, without limitation, the revocation,  
26 suspension or surrender of a license to practice medicine in another jurisdiction, is grounds for  
27 initiating disciplinary action.

28 13. Respondent was disciplined by the Medical Board of California as described above.

1 14. Respondent failed to timely report the disciplinary action taken by the Medical Board  
2 of California.

3 15. Accordingly, Respondent is in violation of NRS 630.306(1)(k).

4 16. By reason of the foregoing, Respondent is subject to discipline by the Nevada State  
5 Board of Medical Examiners as provided in NRS 630.352.

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

7 1. That the Nevada State Board of Medical Examiners give Respondent notice of the  
8 charges herein against him and give him notice that he may file an answer to the Complaint herein  
9 as set forth in NRS 630.339(2) within twenty (20) days of service of the Complaint;

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

12 3. That the Nevada State Board of Medical Examiners determine what sanctions to  
13 impose if it determines there has been a violation or violations of the Medical Practice Act  
14 committed by Respondent;

15 4. That the Nevada State Board of Medical Examiners make, issue and serve on  
16 Respondent its findings of fact, conclusions of law and order, in writing, that includes the  
17 sanctions imposed; and

18 5. That the Nevada State Board of Medical Examiners take such other and further  
19 action as may be just and proper in these premises.

20 DATED this 7<sup>th</sup> day of March, 2017.

21 INVESTIGATIVE COMMITTEE OF  
22 THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

23 By: Jasmine K. Mehta  
24 Robert Kilroy, Esq.

25 General Counsel and Attorney for the Investigative Committee  
26 Jasmine K. Mehta, Esq.

27 Deputy General Counsel and Attorney for the Investigative  
28 Committee


VERIFICATION

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STATE OF NEVADA            )  
                                          : ss.  
COUNTY OF WASHOE        )

Wayne Hardwick, M.D., having been duly sworn, hereby deposes and states under penalty of perjury that he is the Chairman of the Investigative Committee of the Nevada State Board of Medical Examiners that authorized the Complaint against the Respondent herein; that he has read the foregoing Complaint; and that based upon information discovered in the course of the investigation into a complaint against Respondent, he believes that the allegations and charges in the foregoing Complaint against Respondent are true, accurate, and correct.

DATED this 7<sup>th</sup> day of MARCH, 2017.


  
\_\_\_\_\_  
Wayne Hardwick, M.D.

**CERTIFICATE OF MAILING**

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 7<sup>th</sup> day of March 2017; I served a file copy of COMPLAINT & Fingerprint Information, via USPS certified electronic return receipt mail to the following:

Su Young Pak, M.D.  
5451 La Palma Ave., #14  
La Palma, CA 90623

Dated this 7<sup>th</sup> day of March, 2017.



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Angelia L. Donohoe  
Legal Assistant

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