BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

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In the Matter of Charges and
Complaint Against

JASON J. EMER, M.D.,

Respondent.

Case No. 18-43242-1

FILED

MAY 2 3 2018

NEVADA STATE BOARD OF MEDICAL EXAMINERS

COMPLAINT

The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners ("Board") hereby issues this formal Complaint against Jason J. Emer, M.D. (hereinafter referred to as Respondent), a licensed physician 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. 15808). Respondent was issued his license from the Board on April 8, 2015, pursuant to the provisions of NRS Chapter 630.
- 2. On or about July 3, 2017, the State of Illinois Department of Financial and Professional Regulation, Division of Professional Regulation ("Illinois Medical Board") issued a Consent Order in Case No. 2016-4798, and it became effective immediately. In said case, Respondent was issued his license to practice medicine in Illinois, and was reprimanded upon issuance.
- 3. The Illinois Medical Board accused and reprimanded Respondent for certain professional and ethical issues that occurred during his residency and fellowship.

¹ 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., Mr. M. Neil Duxbury, and Aury Nagy, M.D.

1	4.	In 2015, when Respondent initially obtained his medical license in Nevada, the
2	Board was made aware of Respondent's professional and ethical issues that occurred during his	
3	residency and fellowship.	
4	5.	Pursuant to the Consent Order, Respondent was disciplined as follows: (1) the
5	Illinois Medical Board issued Respondent his Illinois medical license; and (2) Respondent was	
6	required to take and pass all 5 topic areas of the Ethics and Boundaries Post-Licensure ("EBAS")	
7	Essay Examination within twelve (12) months of the effective date of said Consent Order, which	
8	Respondent completed in January, 2018.	
9	6.	Respondent did not timely report said Consent Order to the Nevada State Board of
10	Medical Examiners.	
11	Count I	
12	NRS 630.301(3)	
13	Western State of the State of t	(Disciplinary Action by Another Licensing Board)
14	7.	All of the allegations contained in the above paragraphs are hereby incorporated by
15	reference as though fully set forth herein.	
16	8.	NRS 630.301(3) provides that any disciplinary action, including the revocation,
17	suspension, modification or limitation of a license to practice any type of medicine, taken by	
18	another state, is grounds for initiating disciplinary action against a licensee.	
19	9.	On or about July 3, 2017, the Consent Order between Respondent and the Illinois
20	Medical Board became effective.	
21	10.	The Consent Order was a disciplinary action taken by another state.
22	11.	By reason of the foregoing, Respondent is subject to discipline by the Nevada State
23	Board of Medical Examiners as provided in NRS 630.352.	
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Count II

NRS 630.306(1)(k)

(Failure to Report Disciplinary Action)

- All of the allegations contained in the above paragraphs are hereby incorporated by 12. reference as though fully set forth herein.
- NRS 630.306(1)(k) provides that failure by a licensee or applicant to report in 13. writing, within 30 days, any disciplinary action taken against the licensee or applicant by another state, the Federal Government or a foreign country, including, without limitation, the revocation, suspension or surrender of a license to practice medicine in another jurisdiction, is grounds for initiating disciplinary action.
 - Respondent was disciplined by the Illinois Medical Board as described above. 14.
- Respondent failed to timely report the disciplinary action taken by the Illinois Medical 15. Board.
 - Accordingly, Respondent has violated NRS 630.306(1)(k). 16.
- By reason of the foregoing, Respondent is subject to discipline by the Nevada State 17. Board of Medical Examiners as provided in NRS 630.352.

WHEREFORE, the Investigative Committee prays:

- That the Nevada State Board of Medical Examiners give Respondent notice of the 1. charges herein against him and give him notice that he may file an answer to the Complaint herein as set forth in NRS 630.339(2) within twenty (20) days of service of the Complaint;
- That the Nevada State Board of Medical Examiners set a time and place for a 2. formal hearing after holding an Early Case Conference pursuant to NRS 630.339(3);
- That the Nevada State Board of Medical Examiners determine what sanctions to 3. impose if it determines there has been a violation or violations of the Medical Practice Act committed by Respondent;
- That the Nevada State Board of Medical Examiners make, issue and serve on 4. Respondent its findings of fact, conclusions of law and order, in writing, that includes the sanctions imposed; and

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

DATED this 25 day of May, 2018.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

Robert Kilroy, Esq., General Counsel Donald K. White, Esq., Deputy General Counsel Attorneys for the Investigative Committee

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners

VERIFICATION

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 23/d day of May, 2018.

Mayre Hardwick, M.D.