

1 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 HUY NGUYEN, M.D.,
9 Respondent.

Case No. 19-30254-1

FILED

JAN 16 2019

NEVADA STATE BOARD OF
MEDICAL EXAMINERS

By: 

10
11 COMPLAINT

12 The Investigative Committee (IC) of the Nevada State Board of Medical Examiners (Board)
13 hereby issues this Complaint (Complaint) against Huy Nguyen, M.D. (Respondent), a licensed
14 physician in Nevada. After investigating this matter, the IC¹ has a reasonable basis to believe that
15 Respondent has violated provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada
16 Administrative Code (NAC) Chapter 630 (collectively, the Medical Practice Act). The IC alleges
17 the following facts:

- 18 1. Respondent was licensed by the Board, pursuant to the provisions of the Medical
- 19 Practice Act, on July 15, 2005, and is currently licensed in active status (License No. 11525).
- 20 2. Patient A's true identity is not disclosed herein to protect his privacy, but is
- 21 disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.
- 22 3. On August 24, 2012, Patient A, who was vacationing from Ohio, was admitted to
- 23 the St. Rose Dominican Hospital via the emergency room (ER) for a headache and eye pain.
- 24 Patient A stated that he went to the ER due to "left eye infection was burning, seeping and flaming
- 25 red."

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28 ¹ At the time of filing, the IC was composed of Theodore Berndt, M.D., Chairman, Wayne Hardwick, M.D., and Mr. M. Neil Duxbury, Public Member.

1 he provided medical treatment to Patient A, because when Respondent, without ruling out a
2 herpetic or fungal infection during his full physical examination, started Patient A on the steroid
3 (prednisolone) drops he deviated from the appropriate standard of care, which requires the ruling
4 out of any opportunistic infections and failed to conduct a slip-lamp examination prior to treating
5 Patient A with steroid eye drops treatment.

6 12. By reason of the foregoing, Respondent is subject to discipline by the Board as
7 provided in NRS 630.352.

8 **Count II**

9 **(Failure to Maintain Complete Medical Records)**

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

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

15 15. Respondent failed to maintain complete medical records relating to the diagnosis,
16 treatment and care of Patient A, by failing to document his actions when he treated Patient A,
17 whose medical records were not timely, legible, accurate, and complete.

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

20 **WHEREFORE**, the IC prays:

21 1. That the Board give Respondent notice of the charges herein against him and give
22 him notice that he may file an answer to the Complaint herein as set forth in NRS 630.339(2)
23 within twenty (20) days of service of the Complaint;

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

26 3. That the Board determine what sanctions to impose if it finds and concludes that
27 there has been a violation or violations of the Medical Practice Act committed by Respondent;

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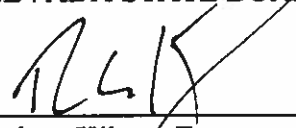
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4. That the Board make, issue and serve on Respondent its findings of fact, conclusions of law and order, in writing, to include sanctions to be imposed; and

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

DATED this 16 day of January, 2019.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

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

VERIFICATION

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STATE OF NEVADA)
 : ss.
COUNTY OF WASHOE)

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

Dated this 16th day of January, 2019.



Wayne Hardwick, M.D.

CERTIFICATE OF SERVICE

I hereby certify that I am employed by the Nevada State Board of Medical Examiners and that on the 20th day of March, 2019, I served a file-stamped copy of the COMPLAINT, via USPS e-certified return receipt mail to the following:

Huy Nguyen, M.D.
6771 West Charleston Boulevard, #C
Las Vegas, NV 89146
(702) 412-3326

DATED this 20th day of March, 2019.



Sheri L. Quigley, Legal Assistant

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