

1 **BEFORE THE BOARD OF MEDICAL EXAMINERS**
2 **OF THE STATE OF NEVADA**

3 * * * * *

4 **In the Matter of Charges and**
5 **Complaint Against**
6 **STEPHEN WINSLOW GORDON, M.D.,**
7 **Respondent.**

Case No. 19-11531-1

FILED

FEB 28 2019

**NEVADA STATE BOARD OF
MEDICAL EXAMINERS**
By: 

8
9 **COMPLAINT**

10 The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners (Board)
11 hereby issues this formal Complaint (Complaint) against Stephen Winslow Gordon, M.D.
12 (Respondent), a physician licensed in Nevada. After investigating this matter, the IC has a
13 reasonable basis to believe that Respondent has violated provisions of Nevada Revised Statutes
14 (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical
15 Practice Act). The IC alleges the following facts:

16 1. Respondent is, and was at all times relevant to this case, a physician licensed to
17 practice medicine in the State of Nevada (License No. 7986). His license was originally issued
18 by the Board on September 23, 1996.

19 **A. Respondent's Treatment of Patient A**

20 2. Patient A was a healthy, well-developed 38-year-old female when she presented to
21 Respondent for liposuction, liposculpture, fat grafting, and panniculectomy procedures on or
22 about January 3, 2014 (the Operation).

23 3. Respondent performed the Operation on January 3, 2014, and caused multiple
24 extraneous injuries to Patient A.

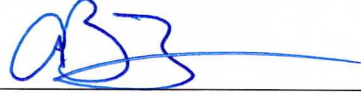
25 4. During the Operation, Patient A went into respiratory distress, was transported to
26 the nearest hospital emergency department, and died shortly thereafter.

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28 ¹ The Investigative Committee (IC) of the Nevada State Board of Medical Examiners (Board), at the time this formal Complaint was authorized for filing, was composed of Board members Theodore B. Berndt, M.D., Chairman, Michael J. Fischer, M.D., and Ms. Valerie J. Clark.

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DATED this 28th day of February, 2019.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

Aaron Bart Fricke, Esq., Deputy General Counsel
Attorney for the Investigative Committee

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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 28th day of February, 2019.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS



Wayne Hardwick, M.D., Chairman