

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

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4
5 **In the Matter of Charges and Complaint**
6 **Against**
7 **HUGO PAULSON, M.D.,**
8 **Respondent.**

Case No. 20-4039-1

FILED

NOV - 4 2020

NEVADA STATE BOARD OF
MEDICAL EXAMINERS
By: _____

9
10 **COMPLAINT**

11 The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners
12 (Board), by and through Sarah A. Bradley, Esq., Deputy Executive Director, and attorney for the IC,
13 having a reasonable basis to believe that Hugo Paulson, M.D. (Respondent) violated the provisions
14 of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter
15 630 (collectively, the Medical Practice Act), hereby issues its Complaint, stating the IC's charges
16 and allegations as follows:

17 1. Respondent is a medical doctor holding a license to practice medicine in the State of
18 Nevada (License No. 2627). Respondent was originally licensed by the Board on June 7, 1972, and
19 Respondent's license is currently in an "inactive status."

20 2. On July 12, 2019, Respondent and the Arizona Medical Board entered into an "Order
21 for Surrender of License and Consent to Same."

22 3. The Arizona Medical Board initiated this action after receiving a complaint from the
23 mother of a minor female patient (AC) regarding a dermatologic examination performed by
24 Respondent in which she complained that Respondent's actions and statements made her daughter
25 uncomfortable.

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28 ¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time this formal
Complaint was authorized for filing, was composed of Board members Mr. M. Neil Duxbury, Chairman,
Aury Nagy, M.D., and Michael C. Edwards, M.D., FACS.

COUNT II

NRS 630.306(1)(k) (Failure to Report Disciplinary Action by Another State Medical Board)

14. All of the allegations in the above paragraphs are hereby incorporated as if fully set forth herein.

15. Pursuant to NRS 630.306(1)(k), failure to report in writing, within thirty (30) days, any disciplinary action taken by another state, including, without limitation, the revocation, suspension or surrender of a license to practice medicine in another jurisdiction, is grounds for disciplinary action against a licensee.

16. The Arizona Medical Board action and the Medical Board of California action constitute disciplinary action by another state and Respondent did not report those actions to the Board within thirty (30) days.

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

WHEREFORE, the Investigative Committee prays:

1. That the Board give Respondent notice of the 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;

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

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

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

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

DATED this 4th day of November, 2020.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 
Sarah A. Bradley, Esq. Deputy Executive Director,
Attorney for the Investigative Committee

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VERIFICATION

STATE OF NEVADA)
 : ss.
COUNTY OF WASHOE)

Mr. M. Neil Duxbury, 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 4 day of November, 2020.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS


By: M. Neil Duxbury
M. Neil Duxbury, Chairman

CERTIFICATE OF SERVICE

I hereby certify that I am employed by the Nevada State Board of Medical Examiners and that on the 4th day of November, 2020, I served a file-stamped copy of the foregoing COMPLAINT, via U.S. Certified Mail to the following parties:

Hugo Paulson, M.D.
2285 Corporate Cir., Ste. 200
Henderson, NV 89074
Certified Mail Receipt No.: 9171 9690 0241 618146

DATED this 4th day of November, 2020.


Mercedes Fuentes, Legal Assistant
Nevada State Board of Medical Examiners