# Nevada State Board of Medical Examiners 9600 Gateway Drive Reno, Nevada 89521

# BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

\* \* \* \* \*

In the Matter of Charges and Complaint

**Against** 

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**HUGO PAULSON, M.D.,** 

Respondent.

Case No. 20-4039-1

**FILED** 

NOV - 4 2020

NEVADA STATE BOARD OF MEDICAL EXAMINERS BY:

#### **COMPLAINT**

The Investigative Committee<sup>1</sup> (IC) of the Nevada State Board of Medical Examiners (Board), by and through Sarah A. Bradley, Esq., Deputy Executive Director, and attorney for the IC, having a reasonable basis to believe that Hugo Paulson, M.D. (Respondent) 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 Complaint, stating the IC's charges and allegations as follows:

- 1. Respondent is a medical doctor holding a license to practice medicine in the State of Nevada (License No. 2627). Respondent was originally licensed by the Board on June 7, 1972, and Respondent's license is currently in an "inactive status."
- 2. On July 12, 2019, Respondent and the Arizona Medical Board entered into an "Order for Surrender of License and Consent to Same."
- 3. The Arizona Medical Board initiated this action after receiving a complaint from the mother of a minor female patient (AC) regarding a dermatologic examination performed by Respondent in which she complained that Respondent's actions and statements made her daughter uncomfortable.

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<sup>&</sup>lt;sup>1</sup> 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.

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- During the Arizona Medical Board's investigation, Board staff noted previous 4. complaints against Respondent alleging that he failed to adequately communicate regarding the nature and purpose of some dermatological examinations.
- In the Arizona Medical Board action, Respondent denied that his evaluation of AC 5. deviated from the standard of care but admits that he could have better communicated the nature and purpose of his dermatological evaluation for AC.
- 6. In the Arizona Medical Board action, Respondent indicated that he had retired from the practice of medicine and requested to surrender his license to resolve the complaint.
- Respondent did not report the Arizona Medical Board action to the Board as required 7. by NRS 630.306(1)(k).
- On July 14, 2020, the Medical Board of California accepted a voluntary surrender of 8. license from Respondent based on the Arizona Medical Board action.
- 9. Respondent did not report the Medical Board of California action to the Board as required by NRS 630.306(1)(k).

#### **COUNT I**

#### NRS 630.301(3) (Disciplinary Action by Another State Medical Board)

- All of the allegations in the above paragraphs are hereby incorporated as if fully set 10. forth herein.
- 11. Pursuant to NRS 630.301(3), any disciplinary action, including, without limitation, the revocation, suspension, modification or limitation of a license to practice any type of medicine, taken by another state, among other entities, is grounds for disciplinary action against a licensee.
- The Arizona Medical Board action and the Medical Board of California action 12. constitute disciplinary action by another state.
- By reason of the foregoing, Respondent is subject to discipline by the Board as 13. provided in NRS 630.352.

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#### **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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# OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners

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

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, Chairman

# OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners

# 9600 Gateway Drive Reno, Nevada 89521 (775) 688-2559

#### **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 074168146

DATED this Up day of November, 2020.

Mercedes Fuentes, Legal Assistant Nevada State Board of Medical Examiners