

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. 21-11531-1

**FILED**

**FEB 24 2021**

**NEVADA STATE BOARD OF  
MEDICAL EXAMINERS**

By: 

9                                   **COMPLAINT**

10           The Investigative Committee<sup>1</sup> (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's name is not disclosed in this Complaint to protect her identity, but her  
21 identity is disclosed in the Patient Designation contemporaneously served on Respondent with a  
22 copy of this Complaint.

23           3.       Patient A was a healthy, 30-year-old female in February 2018, when she presented  
24 to Respondent for liposuction in her lower back, abdomen, and flanks, and fat transfer into her  
25 buttocks. The foregoing is commonly referred to as a "Brazilian Butt Lift" procedure (hereinafter,  
26 the "Operation"), a procedure with a risk of death far greater than any other cosmetic surgeries.

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28 <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.





