

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**

Case No. 22-39868-1

6 **Against:**

FILED

7 **ANTHONY EMMANUEL QUINN, M.D.,**

APR 14 2022

8 **Respondent.**

NEVADA STATE BOARD OF
MEDICAL EXAMINERS

By: *Stall*

9
10 **COMPLAINT**

11 The Investigative Committee (IC)¹ of the Nevada State Board of Medical Examiners
12 (Board), by and through Ian J. Cumings, J.D., Deputy General Counsel and attorney for the IC,
13 having a reasonable basis to believe that Anthony Emmanuel Quinn, M.D., (Respondent) violated
14 the provisions of Nevada Revised Statutes (NRS) Chapter 630 and the Nevada Administrative
15 Code (NAC) Chapter 630 (collectively Medical Practice Act), hereby issues its Complaint
16 (Complaint), stating the IC's charges and allegations as follows:

17 1. Respondent was at all times relative to this Complaint, a physician licensed to
18 practice medicine in the State of Nevada (License No. 15814). Respondent was originally
19 licensed by the Board on April 13, 2015.

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

21 2. Patient A was a thirty-two (32) year-old female when she presented to Respondent
22 for medical care on May 18, 2015. Patient A's true identity is not disclosed herein to protect her
23 privacy but is disclosed in the Patient Designation served upon Respondent along with a copy of
24 this Complaint.

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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 Victor M. Muro, M.D., Chair,
Ms. April Mastroluca, and Weldon Havins, M.D.

1 3. Patient A presented to Respondent for psychiatric care after reporting symptoms of
2 depression as a result of an abusive relationship. Patient A was a vulnerable patient with a prior
3 history of one (1) suicide attempt and a hospitalization for depression.

4 4. During Patient A's psychiatric treatment, the Respondent gleaned privileged
5 information about the patient, including facts pertaining to Patient A's past including recent and
6 ongoing dysfunctional relationships. During the course of Patient A's treatment, Respondent
7 prescribed sedative hypnotic agents to Patient A.

8 5. Patient A was last seen by the Respondent on March 17, 2016, for an outpatient
9 visit, where the Respondent prescribed Patient A Benzodiazepines.

10 6. Following the March 17, 2016, medication appointment, Respondent began an
11 inappropriate personal relationship with Patient A, which culminated in the Respondent having
12 sexual intercourse with Patient A.

13 **COUNT I**

14 **NRS 630.301(4) – Malpractice**

15 7. All of the allegations contained in the above paragraphs are hereby incorporated by
16 reference as though fully set forth herein.

17 8. NRS 630.301(4) provides that malpractice of a Physician is grounds for initiating
18 disciplinary action against a licensee.

19 9. NAC 630.040 defines malpractice as “the failure of a physician, in treating a
20 patient, to use the reasonable care, skill, or knowledge ordinarily used under similar
21 circumstances.”

22 10. As demonstrated by, but not limited to, the above-outlined facts, Respondent
23 committed malpractice with respect to the treatment of Patient A by engaging in an inappropriate
24 personal and sexual relationship with a vulnerable patient who had recently been under the
25 psychiatric care of the Respondent.

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

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COUNT II

**NRS 630.301(7) – Violation of Patient Trust and Exploitation of Physician and Patient
Relationship for Financial or Personal Gain**

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

13. NRS 630.301(7) provides that “engaging in conduct that violates the trust of a patient and exploits the relationship between the physician and the patient for financial or other personal gain” is grounds for initiating discipline against a licensee.

14. As demonstrated by, but not limited to, the above-outlined facts, Respondent violated the trust of a patient and exploited the relationship between the Respondent and Patient A by gaining intimate knowledge of Patient A during psychiatric treatment, and subsequently engaging in a sexual relationship with her.

15. 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 award fees and costs for the investigation and prosecution of this case as outlined in NRS 622.400;

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

DATED this 14 day of April, 2022.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

IAN J. CUMINGS, J.D.
Deputy General Counsel
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Reno, NV 89521
Tel: (775) 688-2559
Email: icumings@medboard.nv.gov
Attorney for the Investigative Committee

1 VERIFICATION

2 STATE OF NEVADA)
3) : ss.
4 COUNTY OF WASHOE)

5 Victor M. Muro, M.D., having been duly sworn, hereby deposes and states under penalty
6 of perjury that he is the Chairman of the Investigative Committee of the Nevada State Board of
7 Medical Examiners that authorized the Complaint against the Respondent herein; that he has read
8 the foregoing Complaint; and that based upon information discovered in the course of the
9 investigation into a complaint against Respondent, he believes that the allegations and charges in
10 the foregoing Complaint against Respondent are true, accurate and correct.

11 DATED this 14th day of April, 2022.

12 INVESTIGATIVE COMMITTEE OF THE
13 NEVADA STATE BOARD OF MEDICAL EXAMINERS

14 By: V M Muro
15 VICTOR M. MURO, M.D.
16 *Chairman of the Investigative Committee*
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