

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

3                                   \* \* \* \* \*

4  
5   **In the Matter of Charges and Complaint**

**Case No. 22-38073-1**

6   **Against:**

7   **JEFFREY DAVID GROSS, M.D.,**

8   **Respondent.**

FILED

APR 12 2022

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS  
By: 

9  
10                                   **COMPLAINT**

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

17           1.       Respondent was at all times relative to this Complaint a medical doctor holding an  
18 active license to practice medicine in the State of Nevada (License No. 13807). Respondent was  
19 originally licensed by the Board on February 1, 2011.

20           2.       On or about January 23, 2018, an indictment was filed against Respondent in the  
21 United States District Court for the Central District of California.

22           3.       The indictment alleged that beginning on an unknown date, but no later than in or  
23 about February 2008, and continuing through at least in or around June 2013, Respondent and others  
24 conspired to commit 1) honest services mail fraud, pursuant to 18 USC §§ 1341 and 1346, honest  
25 services wire fraud, pursuant to 18 USC §§ 1343 and 1346, and use of an interstate facility in aid of  
26 bribery, pursuant to 18 USC § 1952(a).

27  
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 Victor M. Muro, M.D., Aury Nagy, M.D., and  
Ms. Maggie Arias-Petrel.



1 Respondent violated the public's trust in the medical community by disregarding the national code  
2 of ethics when accepting kickbacks and bribes.

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

5 **COUNT III**

6 **NRS 630.301(11)(g) - Conviction of an Offense Involving Moral Turpitude**

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

9 15. NRS 630.301(11)(g) provides that conviction of any offense involving moral  
10 turpitude is grounds for initiating disciplinary action or denying licensure.

11 16. Respondent was convicted of the federal crime of being part of a conspiracy with  
12 others taking kickbacks and bribes, in violation of 18 U.S.C. § 371, a felony.

13 17. The federal crime of being part of a conspiracy with other conspirators taking  
14 kickbacks and bribes, in violation of 18 U.S.C. § 371, a felony, is behavior that gravely violates  
15 the sentiments and accepted standards of the medical community and violates the public's trust in  
16 the medical community as a whole in the State of Nevada because the offense involves a  
17 physician's moral turpitude.

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

20 **COUNT IV**

21 **NRS 630.306(1)(b)(1) – Engaging in Conduct Which is Intended to Deceive**

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

24 20. NRS 630.306(1)(b)(1) provides that engaging in any conduct which is intended to  
25 deceive is grounds for disciplinary action.

26 21. Respondent violated Section 630.306(1)(b)(1) when the facts as acknowledged by  
27 Respondent in the Plea Agreement indicate that he knew of the conduct in which he was partaking  
28 against his patients and other agencies and individuals and he concealed material information

1 about the crime, and that he did not make known, as soon as possible, the crime to a proper legal  
2 authority.

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

5 **WHEREFORE**, the Investigative Committee prays:

6 1. That the Board give Respondent notice of the charges herein against him and give  
7 him notice that he may file an answer to the Complaint herein as set forth in  
8 NRS 630.339(2) within twenty (20) days of service of the Complaint;

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

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

13 4. That the Board award fees and costs for the investigation and prosecution of this  
14 case as outlined in NRS 622.400;


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

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

19 DATED this 12<sup>th</sup> day of April, 2022.

20  
21 INVESTIGATIVE COMMITTEE OF THE  
22 NEVADA STATE BOARD OF MEDICAL EXAMINERS

23 By:

  
24 DONALD K. WHITE, J.D.  
25 Senior Deputy General Counsel  
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*Attorney for the Investigative Committee*

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VERIFICATION

STATE OF NEVADA            )  
  : ss.  
COUNTY OF CLARK        )

Victor M. Muro, 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 12<sup>th</sup> day of April, 2022.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:   
VICTOR M. MURO, M.D.  
*Chairman of the Investigative Committee*