

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. 23-30779-1

6 **Against:**

FILED

7 **JILL ALLISON OLIVER, M.D.,**

MAY - 8 2023

8 **Respondent.**

**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 William P. Shogren, Deputy General Counsel and attorney for the IC,
13 having a reasonable basis to believe that Jill Allison Oliver, 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. 11484). Respondent was
19 originally licensed by the Board on July 1, 2005.

20 2. Respondent, at all times relevant to this Complaint, held active Certificates of
21 Registration with the Nevada State Board of Pharmacy (Pharmacy Board), Nos. PD00349,
22 PD15479, CS20010, and CS15479.

23 3. On July 23, 2021, the Pharmacy Board filed a First Amended Notice of Intended
24 Action and Accusation (Accusation) against Respondent, alleging that between 2019 and 2020,
25 while acting as owner and medical director of Glimpse Medical, Respondent violated various
26 statutes and regulations within the Pharmacy Board's jurisdiction.

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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 Bret W. Frey, M.D., and Carl N. Williams, Jr.,
M.D., FACS.

OFFICE OF THE GENERAL COUNSEL
Nevada State Board of Medical Examiners
9600 Gateway Drive
Reno, Nevada 89521
(775) 688-2559

1 10. NAC 639.945(2) provides that the owner of any business or facility licensed,
2 certified, or registered by the Board is responsible for the acts of all personnel in his or her
3 employ.

4 11. NAC 639.7425(2), NAC 639.744, NAC 639.7445, and NAC 639.945(2) are
5 regulations adopted by the Pharmacy Board.

6 12. Respondent violated NRS 630.306(1)(b)(3) when the Pharmacy Board issued its
7 Order and found that Respondent violated NAC 639.7425(2), NAC 639.744, and NAC 639.7445.
8 *See Exhibit 1.*

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

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

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

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

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

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

21 5. That the Board make, issue and serve on Respondent its findings of fact,
22 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 8th day of May, 2023.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

WILLIAM P. SHOGREN
Deputy General Counsel
9600 Gateway Drive
Reno, NV 89521
Tel: (775) 688-2559
Email: dcontine@medboard.nv.gov
Attorney for the Investigative Committee

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VERIFICATION

STATE OF NEVADA)
 : ss.
COUNTY OF WASHOE)

Bret W. Frey, 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 8th day of May, 2023.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

BRET W. FREY, M.D.
Chairman of the Investigative Committee

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CERTIFICATE OF SERVICE

I hereby certify that I am employed by the Nevada State Board of Medical Examiners and that on the 8th day of May, 2023, I served a file-stamped copy of the foregoing **COMPLAINT** as and required fingerprinting materials, via USPS Certified Mail, postage pre-paid, to the following parties:

Jill Allison Oliver, M.D.
9622 Bel Sole Ct.
Las Vegas, NV 89178

Tracking No.: 9171 9690 0935 0254 7678 93

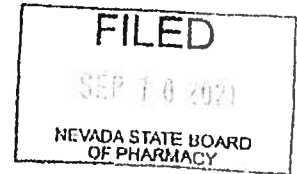
DATED this 9th day of May, 2023.



MERCEDES FUENTES
Legal Assistant
Nevada State Board of Medical Examiners

EXHIBIT 1

EXHIBIT 1



BEFORE THE NEVADA STATE BOARD OF PHARMACY

NEVADA STATE BOARD OF PHARMACY,

Petitioner,

v.

JILL OLIVER, MD,
Certificate of Registration Nos. PD00349,
PD15479, CS20010, CS15479,

Respondent.

Case Nos. 20-007-PD-A-S
20-007-PD-B-S
20-007-CS-A-S
20-007-CS-B-S

FINDINGS OF FACTS,
CONCLUSIONS OF LAW,
AND ORDER

This matter came before the Nevada State Board of Pharmacy ("Board") at its regularly scheduled meeting on Wednesday, September 1, 2021, in Las Vegas, Nevada. Courtney K. Lee, Esq., appeared and prosecuted the case before the Board. Respondent Jill Oliver, MD ("Oliver"), Certificate of Registration Nos. PD00349, PD15479, CS20010, CS15479 represented herself *in proper person*. Upon hearing the case, and based upon the evidence presented, the Board determines the following Findings of Facts, Conclusions of Law, and Order.

FINDINGS OF FACTS

The allegations against Respondent, as stated in the First Amended Notice of Intended Action and Accusation ("Amended Accusation") dated July 23, 2021 on file herein, and Answer filed by Respondent Oliver on June 28, 2021, requested by Respondent to be deemed the Answer for the Amended Accusation, and upon which the Board made findings of facts, are as follows:

1. The Board has jurisdiction over Respondent and this matter.
2. Respondent Oliver owns/operates Glimpse Medical ("Glimpse"), a medical practice, and served as the medical director during all relevant timeframes.

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3. Dianne Racosas ("Racosas") was employed by Glimpse during the relevant timeframes, and performed dispensing technician duties.

4. From approximately 2013-2016, Racosas was a licensed dispensing technician for Dr. Oliver. Racosas then took an extended leave. Racosas did not renew her dispensing technician license after 2016.

5. From approximately July 1, 2019 to January 23, 2020, Racosas performed dispensing technician duties without an active dispensing technician license.

6. Dr. Oliver permitted Racosas to be employed in the capacity of dispensing technician at Glimpse without an active dispensing license for approximately 115 days.

CONCLUSIONS OF LAW

Based upon the foregoing findings of facts, the Board concludes as a matter of law:

7. Respondent Oliver allowed Racosas to act as a dispensing technician without a renewed licensed/registration, performed her duty as the overseeing dispensing practitioner in an incompetent, unskillful or negligent manner and engaged in unprofessional conduct and conduct contrary to the public interest in violation of NAC 639.7425(2), NAC 639.744, NAC 639.7445, NAC 639.945(1)(i) and (j), and is subject to discipline pursuant to NRS 639.210(4), and (12), and/or NRS 639.255.

8. Respondent Oliver, as the owner/operator of Glimpse is responsible for the acts or omissions of its employees/personnel pursuant to NAC 639.945(2), and is therefore subject to discipline pursuant to NRS 639.210(4), and (12) and/or NRS 639.255.

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ORDER

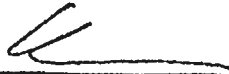
THEREFORE, BASED UPON THE FINDINGS OF FACTS, AND CONCLUSIONS OF LAW, THE BOARD HEREBY ORDERS:

1. Respondent Oliver's Certificates of Registration Nos. PD00349, PD15479, CS20010, and CS15479 are disciplined as follows:
 - a. This Order shall serve as a public reprimand regarding Respondent Oliver's duties and responsibilities as a registered dispensing practitioner and controlled substances registrant.
 - b. Respondent Oliver shall pay fines of five thousand dollars (\$5,000) by *cashier's check* or *certified check* or *money order* made payable to "State of Nevada, Office of the Treasurer," to be received by the Board's Reno office located at 985 Damonte Ranch Parkway – Suite 206, Reno, Nevada 89521, within thirty (30) days of entry of this Order.
 - c. Respondent Oliver shall pay attorney's fees and investigative costs of one thousand three hundred and thirty-one dollars and fifty cents (\$1,331.50) by *cashier's check* or *certified check* or *money order* made payable to "Nevada State Board of Pharmacy," to be received by the Board's Reno office located at 985 Damonte Ranch Parkway – Suite 206, Reno, Nevada 89521, within thirty (30) days of entry of this Order.
2. Any failure by Respondent to comply with the terms of this Order may result in issuance by the Executive Secretary of an order to show cause pursuant to NAC 639.965 directing Respondent to appear before the Board at the next scheduled Board meeting for hearing. If the show cause hearing results in a finding of a violation of this Order by any Respondent, then the Board may impose additional discipline upon any Respondent consistent with NRS Chapter 639.

3. This Order is effective immediately.

IT IS SO ORDERED.

Entered this 10th day of September, 2021.



Helen Park, President
Nevada State Board of Pharmacy

CERTIFICATE OF SERVICE

I certify that I am an employee of the Nevada State Board of Pharmacy, and that on this 15th day of September, 2021, I served a true and correct copy of the foregoing document by Certified U.S. Mail to the following:

Jill Oliver, MD
10170 S. Eastern Ave. #100
Henderson, NV 89052

Jill Oliver, MD
5990 S. Rainbow Blvd. #100
Las Vegas, NV 89118


SHIRLEY HUNTING