

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. 25-40367-1

6 **Against:**

FILED

7 **KENNY ELIAS HANNA, Jr., M.D.,**

SEP 10 2025

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 (Board),
12 by and through Ian J. Cumings, Senior Deputy General Counsel and attorney for the IC, having a
13 reasonable basis to believe that Kenny Elias Hanna, M.D. (Respondent) violated the provisions of
14 Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630
15 (collectively, the Medical Practice Act), hereby issues its Complaint, stating the IC's charges and
16 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. 14660). Respondent was
19 originally licensed by the Board on January 23, 2013.

20 2. Respondent's specialty is listed "Surgery, Hand," on the Board's website.
21 Respondent holds an American Board of Medical Specialties (ABMS) certification in general
22 surgery. Respondent does not hold any ABMS certification from an Orthopaedic Board in
23 orthopedic nor hand surgery.

24 3. An orthopedic surgery residency consists of five (5) years of post-graduate medical
25 education consisting of clinical and surgical training. An orthopedic residency is necessary for a
26 physician to be eligible to sit for an ABMS Board Examination to become board-certified in
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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., Col. Eric D. Wade, USAF
(Ret.), and Carl N. Williams, Jr., M.D.

1 orthopedic surgery. Medical residents apply following completion of medical school in order to
2 match into an orthopedic surgery residency.

3 4. Respondent completed a five (5) year general surgery residency which included one
4 (1) month of orthopedic surgical training and a one (1) year fellowship in hand surgery without
5 obtaining an ABMS Board Certification in hand surgery.

6 5. Respondent was employed by Pledge Medical. During Respondent's employment
7 at Pledge Medical, Respondent was listed as a "board-certified Orthopedic Surgeon." Respondent's
8 curriculum vitae from Pledge Medical states he underwent an orthopedic surgery residency from
9 July 2006 through June 2011, and Respondent represents himself to be an orthopedic surgeon on
10 multiple healthcare websites. Respondent's actual credentials do not support these claims.

11 **Respondent's Treatment of Patient A**

12 6. Patient A² was a forty-two (42) year-old female at the time of the events at issue.

13 7. On July 13, 2019, Patient A presented to Respondent with complaints of clicking
14 and popping due to a hyperextension injury of her right knee from a March 16, 2018, motor vehicle
15 accident. Respondent scheduled Patient A for a platelet-rich plasma (PRP) injection of the right
16 knee and ordered a magnetic resonance imaging (MRI) study.

17 8. On July 27, 2019, Patient A underwent the ordered MRI study which showed no
18 signs of a meniscal tear or ligamentous injury, no osteochondral defects, but noted intra-articular
19 fat pad edema.

20 9. On July 28, 2019, Respondent performed another PRP injection of Patient A's right
21 knee.

22 10. On September 20, 2019, during Patient A's follow-up appointment, Respondent
23 noted no improvement of Patient A's right knee following the two (2) PRP injections and scheduled
24 her for arthroscopic knee surgery. Respondent failed to document a physical examination Patient
25 A's knee or document a discussion of the risks and benefits of the surgery with her during this
26 appointment.

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² Patient A's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

1 himself to be an orthopedic surgeon as evidenced by, but not limited to, signing Patient B's records
2 as an "orthopedic surgeon."

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

5 **COUNT IV**

6 **NRS 630.304(2) – False or Deceptive Advertising**

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

9 32. NRS 630.304(2) provides that advertising the practice of medicine in a false,
10 deceptive, or misleading manner is grounds for initiating disciplinary action or denying licensure.

11 33. Respondent was advertised on Pledge Medical's website as a "board-certified
12 Orthopedic Surgeon," and Respondent represents himself as an orthopedic surgeon despite having
13 no formal training in orthopedic surgery nor is he board-certified in orthopedics.

14 34. By reason of the foregoing, Respondent is subject to discipline by the Board as
15 provided in NRS 630.352.

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

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

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

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

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

26 5. That the Board make, issue and serve on Respondent its findings of fact, conclusions
27 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 10th day of September, 2025.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: _____


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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 10th day of September, 2025.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:



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