

**BEFORE THE MINNESOTA
BOARD OF MEDICAL PRACTICE**

In the Matter of the
Medical License of
Dr. Stanislav Kruglikov
Year of Birth: 1960
License Number: 43,311

**STIPULATION AND ORDER
FOR INDEFINITE SUSPENSION**

IT IS HEREBY STIPULATED AND AGREED, by and between Dr. Stanislav Kruglikov ("Respondent"), and the Complaint Review Committee ("Committee") of the Minnesota Board of Medical Practice ("Board") as follows:

1. During all times herein, Respondent has been and now is subject to the jurisdiction of the Board from which he holds a license to practice medicine and surgery in the State of Minnesota.

2. Respondent has been advised by Board representatives that he may choose to be represented by legal counsel in this matter. Respondent has chosen to be represented by Marit M. Sivertson, Sivertson & Barrette, P.A., 1465 Arcade Street, St. Paul, Minnesota 55106. The Committee is represented by Kathleen M. Ghroichi, Assistant Attorney General, 445 Minnesota Street, Suite 1400, St. Paul, Minnesota 55101, (651) 757-1490.

FACTS

3. For the purpose of this Stipulation, the Board may consider the following facts as true:

a. Respondent was licensed by the Board to practice medicine and surgery in the State of Minnesota on January 13, 2001.

b. On May 3, 2003, Respondent entered into a Stipulation and Order for Indefinite Suspension ("2003 Order"), which indefinitely suspended Respondent's license to practice

medicine based upon his history of chemical dependency and relapsing to alcohol use while under monitoring by the Health Professionals Services Program ("HPSP"). Under the terms of the 2003 Order, Respondent was required, in part, to refrain from practice until submission of satisfactory evidence to the Board that he was fit and competent to resume the practice of medicine with reasonable skill and safety to patients.

c. On July 9, 2005, Respondent entered into a Stipulation and Order ("2005 Order") with the Board that rescinded the 2003 Order and reinstated Respondent's license with conditions and restrictions. Under the terms of the 2005 Order, Respondent was required, in part, to abstain from alcohol and all mood-altering chemicals, attend self-help program meetings, and submit to unannounced biological fluid screens on a periodic basis.

d. On November 8, 2008, Respondent entered into a Stipulation and Order ("2008 Order") with the Board based upon his relapse to alcohol use in June 2008, in violation of his 2005 Order. Under the terms of the 2008 Order, Respondent was required, in part, to abstain from alcohol and all mood-altering chemicals, attend self-help program meetings, and submit to unannounced biological fluid screens on a periodic basis.

e. On September 11, 2010, Respondent entered into a Stipulation and Order ("2010 Order") with the Board based upon his relapse to alcohol use, in violation of his 2008 Order. Under the terms of the 2010 Order, Respondent was required, in part, to abstain from alcohol and all mood-altering chemicals, attend self-help program meetings, and submit to unannounced biological fluid screens on a periodic basis.

f. On September 13, 2014, the Board granted an Order of Unconditional License to Respondent.

g. On March 11, 2017, Respondent entered into a Stipulation and Order ("2017 Order") with the Board based upon his substance use and violation of his HPSP Participation Agreement and Monitoring Plan. The 2017 Order included a stayed suspension, and Respondent was

required, in part, to comply with all terms of his HPSP Participation Agreement and Monitoring Plan. Respondent's Participation Agreement required, in part, abstinence from alcohol, controlled substances, and any other mood-altering substances. The 2017 Order remains in effect.

h. On June 10, 2019, the Board received a report that Respondent submitted a positive toxicology screen to HPSP on May 28, 2019. The report alleged Respondent admitted to consuming alcohol on May 27, 2019.

i. On July 5, 2019, the Board received Respondent's written response to the allegations. In the response, Respondent admitted a relapse to alcohol use on May 27, 2019.

j. Respondent completed a substance use evaluation on June 11, 2019. The results of the assessment indicated that Respondent met the criteria for alcohol use disorder, moderate. The results included a recommendation that Respondent complete outpatient substance abuse treatment.

k. On July 8, 2019, the Committee reviewed the matter.

STATUTES

4. The Committee views Respondent's practices as inappropriate in such a way as to require Board action under Minnesota Statutes section 147.091, subdivision 1(f) (violating an order of the Board), (r) (became addicted to a drug or intoxicant), and Minnesota Statutes section 214.355 (violating the terms of a Health Professionals Services Program participation agreement) (2018). Respondent agrees that the conduct cited above constitutes a reasonable basis in law and fact to justify the disciplinary action under these statutes.

REMEDY

5. Upon this Stipulation and all of the files, records, and proceedings herein, and without any further notice or hearing herein, Respondent does hereby consent that until further order of the Board, made after notice and hearing upon application by Respondent or upon the Board's own motion, the Board may make and enter an order suspending Respondent's license to practice medicine and surgery in the State of Minnesota as follows:

- a. Respondent's license is **INDEFINITELY SUSPENDED**.
- b. During the period of suspension, Respondent shall not, in any manner, practice medicine and surgery in Minnesota.
- c. Respondent shall sign all necessary releases to allow the Board access to all medical, mental health, evaluation, therapy, chemical dependency, or other records from any treating health professional or evaluator. Respondent shall allow the Board or its designee to communicate with all treating health professionals.
- d. Respondent may petition for reinstatement of his license upon submission of satisfactory evidence that he is fit and competent to resume practice as a physician with reasonable skill and safety to patients. Satisfactory evidence shall include, but is not limited to, six months of documented and uninterrupted recovery, at least twelve random biological fluid screens per quarter, and written statements from all treatment providers that Respondent is fit and competent to resume practice with reasonable skill and safety to patients. The biological fluid screens shall be collected and tested consistent with recognized protocols and handled with legal chain of custody methods.
- e. Upon petitioning for reinstatement, Respondent may be required to appear before the Committee to discuss his petition and practice plans. Upon hearing his petition, the

Committee may recommend that the Board continue, modify, or remove the suspension or impose conditions or restrictions as deemed necessary.

6. Within ten days of signing the Stipulation to this Order, Respondent shall provide the Board with a list of all hospitals and skilled nursing facilities at which Respondent currently has medical privileges, a list of all states in which Respondent is licensed or has applied for licensure, and the addresses and telephone numbers of Respondent's residences. The information shall be sent to the Executive Director, Minnesota Board of Medical Practice, University Park Plaza, 2829 University Avenue S.E., Suite 500, Minneapolis, Minnesota 55414-3246.

7. In the event Respondent resides or practices outside the State of Minnesota, Respondent shall promptly notify the Board in writing of the location of his residence and all work sites. Periods of residency or practice outside of Minnesota will not be credited toward any period of Respondent's suspended, limited, or conditioned license in Minnesota unless Respondent demonstrates that practice in another state conforms completely with Respondent's Minnesota license to practice medicine.

8. If Respondent shall fail, neglect, or refuse to fully comply with each of the terms, provisions, and conditions herein, the Committee shall schedule a hearing before the Board. The Committee shall mail Respondent a notice of the violation alleged by the Committee and of the time and place of the hearing. Respondent shall submit a response to the allegations at least three days prior to the hearing. If Respondent does not submit a timely response to the Board, the allegations may be deemed admitted.

At the hearing before the Board, the Committee and Respondent may submit affidavits made on personal knowledge and argument based on the record in support of their positions. The evidentiary record before the Board shall be limited to such affidavits and this Stipulation

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and Order. Respondent waives a hearing before an administrative law judge and waives discovery, cross-examination of adverse witnesses, and other procedures governing administrative hearings or civil trials.

At the hearing, the Board will determine whether to impose additional disciplinary action, including additional conditions or limitations on Respondent's practice, or suspension or revocation of Respondent's license.

9. In the event the Board in its discretion does not approve this settlement, this Stipulation is withdrawn and shall be of no evidentiary value and shall not be relied upon nor introduced in any disciplinary action by either party hereto except that Respondent agrees that should the Board reject this Stipulation, and if this case proceeds to hearing, Respondent will assert no claim that the Board was prejudiced by its review and discussion of this Stipulation or of any records relating hereto.

10. Respondent waives any further hearings on this matter before the Board to which Respondent may be entitled by Minnesota or United States constitutions, statutes, or rules and agrees that the order to be entered pursuant to the Stipulation shall be the final order herein.


11. Respondent hereby acknowledges that he has read and understands this Stipulation and has voluntarily entered into the Stipulation without threat or promise by the Board or any of its members, employees, or agents. This Stipulation contains the entire agreement between the parties, there being no other agreement of any kind, verbal or otherwise, which varies the terms of this Stipulation.

Dated: 8/30, 2019

Dated: 9-10-19, 2019



DR. STANISLAV KRUGLIKOV
Respondent



FOR THE COMMITTEE

ORDER

Upon consideration of this Stipulation and all the files, records, and proceedings herein,

IT IS HEREBY ORDERED the 2017 Order is rescinded and that the terms of this Stipulation are adopted and implemented by the Board this 14th day of September, 2019.

MINNESOTA BOARD OF
MEDICAL PRACTICE

By: 