

**TRUE AND EXACT  
COPY OF ORIGINAL**

**BEFORE THE MINNESOTA**

**BOARD OF MEDICAL PRACTICE**

In the Matter of the  
Medical License of  
Dr. Stanislav Kruglikov  
Date of Birth: 4/24/1960  
License Number: 43,311

**STIPULATION AND ORDER**

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. Although aware of this opportunity, Respondent has elected not to be represented by counsel. The Committee was represented by Kermit N. Fruechte, Assistant Attorney General, 1400 Bremer Tower, 445 Minnesota Street, St. Paul, Minnesota 55101, (651) 296-7575.

**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"), St. Paul, Minnesota. 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c. On July 9, 2005, Respondent entered into a Stipulation and Order ("2005 Order") with the Board that rescinded the 2003 Order and reinstated Respondent's license with conditions and restrictions.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 at least three times per week, limit his practice to no more than 40 hours per week, and submit to at least 12 unannounced biological fluid screens per quarter.

d. On October 6, 2006, the Board issued a Committee Order that reduced Respondent's required attendance at self-help program meetings from three to two meetings per week. On October 11, 2007, the Board issued a Committee Order that increased Respondent's maximum work hours from 40 hours to 50 hours per week.

e. 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 Board order. Under the terms of the 2008 Order, Respondent was reprimanded and required, in part, to abstain from alcohol and all mood-altering chemicals, refrain from prescribing or administering any prescriptions drug for his own use or his family members' use, obtain a primary care treating physician, engage in individual therapy with a psychiatrist or therapist, attend meetings of a self-help group at least three times per week, and submit to unannounced biological fluid screens on a periodic basis.

f. On August 31, 2009, the Complaint Review Committee issued a Committee Order that increased Respondent's maximum number of work hours from 32 hours to 40 hours per week.

g. On January 27, 2010, Respondent failed to submit a biological fluid screen to HPSP as requested. On January 30, 2010, Respondent submitted a biological fluid screen to HPSP that tested negative for ethylglucuronide (EtG), but revealed a creatinine level and a specific gravity level that suggested a dilute specimen. On February 1, 2010, Respondent notified HPSP that he had taken benzodiazepines during the previous week due to increased anxiety and panic attacks. Respondent acknowledged that he failed to obtain the drugs from his treatment provider, and reported that he obtained the benzodiazepines from a friend.

h. On July 6, 2010, Respondent met with the Complaint Review Committee and admitted taking benzodiazepines during a panic attack to relieve his unpleasant symptoms. Respondent acknowledged that he failed to contact his treatment provider to obtain a prescription for benzodiazepines or other appropriate medications to address his anxiety and panic attacks. Respondent stated that he opted to obtain the benzodiazepines from a friend. Respondent admitted that obtaining and administering non-prescription benzodiazepines for his own use was a violation of his HPSP monitoring plan. Respondent reported that he was currently working 42 hours per week, but denied that his increased practice hours were related to his panic attacks or his failure to comply with his HPSP monitoring plan.

#### STATUTES

4. The Committee views Respondent's practice as inappropriate in such a way as to require Board action under Minn. Stat. section 147.091, subd. 1(f), (l), and (r) (2008), and

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, Respondent does hereby consent that the Board may make and enter an Order **REPRIMANDING** Respondent for the conduct described in paragraphs 3.a. through 3.h. above, and **SUSPENDING** Respondent's license to practice medicine and surgery in the State of Minnesota. The suspension is **STAYED** contingent upon Respondent's compliance with the following terms and conditions:

a. Respondent shall obtain a primary care treating physician, approved in advance by the Board or its designee, to monitor and/or manage all medical or other care provided to Respondent by all health professionals. Respondent shall provide all necessary records releases to enable Respondent's health care professionals to communicate with the primary care treating physician pursuant to this paragraph. The primary care treating physician shall provide quarterly reports to the Board summarizing medical or other care provided to Respondent, as well as addressing Respondent's progress under any terms of this Stipulation and Order relating to Respondent's health status and recovery. Respondent is responsible for ensuring timely submission of all required reports.

b. Respondent shall abstain from alcohol and all mood-altering chemicals, including over-the-counter medications except aspirin, anti-inflammatory agents, and antacids, unless they are prescribed and/or approved by a physician or dentist who has first been informed of Respondent's chemical use history.

c. Respondent shall not prescribe or administer any prescription drug or drug sample for his own use or his family members' use.

d. Respondent shall be subject, without notice, to unannounced blood and urine tests at the request of the Board, or its designee, at least 18 times per quarter. Blood and urine screens may be requested at any time. Respondent shall provide the requested sample within the time frame directed. The blood and urine screens shall be:

- 1) Collected and tested consistent with protocols established by a Board-designated laboratory.
- 2) Handled through legal chain of custody methods.
- 3) Paid for by Respondent.

The biological fluid collection and testing shall take place at a Board-designated laboratory as directed by the Board or its designee. Testing shall screen for opiates, cocaine, barbiturates, amphetamines, benzodiazepines, marijuana, and other drugs of abuse, including alcohol. The laboratory will provide test results directly to the Board or its designee and Respondent's treating physician. Ingestion of poppyseeds will not be accepted as a justification for a positive drug screen.

e. Respondent shall attend meetings of a self-help program such as AA or NA in support of abstinence at least three times per week. Quarterly reports shall be submitted to the Board or its designee from Respondent's designated sponsors(s) regarding attendance and participation. Respondent is responsible for ensuring timely submission of all required reports.

f. Respondent shall attend monthly meetings of a professional support group such as PSP approved in advance by the Committee or its designee. Quarterly reports shall be submitted to the Board or its designee from Respondent's designated sponsor(s) regarding

Respondent's attendance and participation. Respondent is responsible for ensuring timely submission of all required reports.

g. Respondent shall engage in individual therapy with a psychiatrist or therapist approved in advance by the Committee or its designee. The treating psychiatrist or therapist shall submit quarterly reports to the Board or its designee, and to the primary treating physician regarding Respondent's diagnosis and progress in therapy. Termination of therapy shall be at the recommendation of the approved psychiatrist or therapist, with the approval of the primary treating physician and the Committee. Respondent is responsible for ensuring timely submission of all required reports.

h. Respondent shall provide to the Board, and the treating physician, a copy of any treatment or aftercare plan that is in effect at the time of execution of this Stipulation and Order; or which is modified, or becomes effective, during the time Respondent is subject to this Stipulation and Order. The treatment or aftercare plan, and any modifications to it, shall be approved by the treating physician and shall include at least the following:

- 1) The treatment or aftercare plan activities.
- 2) The name, address, and telephone number for each provider of treatment or aftercare services.

The terms of any such treatment or aftercare plan, or approved modification thereto, to the extent not superseded by this Order, are herewith incorporated by reference. Failure to follow the plan, or approved modification, shall constitute violation of this Order.

i. Upon request by the Board, Respondent shall sign releases authorizing the Board or its designee to obtain Respondent's medical, mental health, or chemical abuse/dependency records from any treating professional, evaluator, or facility.

j. Respondent shall practice in a group setting, approved in advance by the Committee or its designee.

k. Respondent shall identify a work quality assessor, who shall provide quarterly reports to the Board, or its designee, regarding Respondent's overall work performance. Respondent is responsible for ensuring timely submission of all required reports.

l. Respondent's practice shall be limited to no more than 42 hours per week.

m. Respondent shall comply with medication management, as recommended by his treating psychiatrist or therapist.

n. Respondent shall meet on a quarterly basis with a designated Board member or other Board designee. Such meetings shall take place at a time mutually convenient to Respondent and the designated Board member. It shall be Respondent's obligation to contact the designated Board member to arrange each of the meetings. The purpose of such meetings shall be to review Respondent's progress under the terms and conditions of this Stipulation and Order.

o. No sooner than six months from the date of this Order, Respondent may petition, in writing, for reduced monitoring. Upon reviewing Respondent's petition, the Committee, at its discretion and by its own order, may reduce the frequency of the meetings, reports, and/or biological fluid screens required by the terms and conditions of this Order.

p. This Stipulation and Order shall remain in effect for a minimum of four years from the date of the Order. At the end of this period, Respondent may petition for reinstatement of an unconditional license upon submission of proof, satisfactory to the Board, of a minimum of five years of documented, uninterrupted recovery. Upon hearing the petition, the Board may continue, modify, or remove the conditions set out herein.

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 and all work sites. Within seven days of any change, Respondent shall provide the Board with the new address and telephone information. The information shall be sent to Robert A. Leach, 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 the Committee has probable cause to believe that Respondent has failed to comply with any of the requirements for staying the suspension of his license as set forth in paragraph 5 above, or has failed to comply with a Health Professionals Services Program Participation Agreement and Monitoring Plan, if applicable, and/or is subject to a positive biological fluid screen, the Committee may remove the stay of suspension and suspend Respondent's license pursuant to the procedures outlined below:

a. The removal of the stayed suspension shall take effect upon service of an Order of Removal of Stayed Suspension ("Order of Removal"). Respondent agrees that the Committee is authorized to issue an Order of Removal, which shall remain in effect and shall



have the full force and effect of an order of the Board until the Board makes a final determination pursuant to the procedures outlines in paragraph 9 below, or until the complaint is dismissed and the order is rescinded by the Committee. The Order of Removal shall confirm the Committee has probable cause to believe Respondent has failed to comply with or has violated one or more of the requirements for staying the suspension of Respondent's license.

b. Respondent further agrees an Order of Removal issued pursuant to this paragraph shall be deemed a public document under the Minnesota Government Data Practices Act. Respondent waives any right to a hearing before removal of the stayed suspension.

c. The Committee shall schedule a hearing before the Board pursuant to paragraph 9 below to be held within 60 days of service of the Order of Removal.

9. If the Committee issues an Order of Removal pursuant to paragraph 8 above, the following shall apply:

a. The Committee shall mail Respondent a notice of the violation alleged by the Committee and of the time and place of the hearing referred to in paragraph 8.c. above. 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.

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

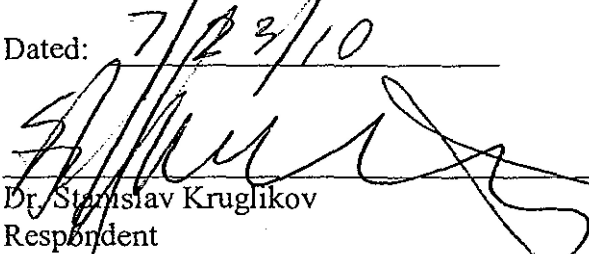
c. At the hearing, the Board will determine whether to impose additional disciplinary action, including additional conditions or limitations on Respondent's practice, or revocation of Respondent's license.

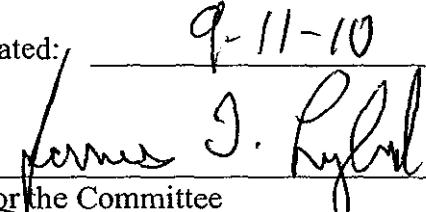
d. The Committee, at its discretion, may schedule a conference with Respondent prior to the hearing before the Board to discuss the allegations and to attempt to resolve the allegations through agreement.

10. 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.

11. 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.

12. Respondent hereby acknowledges that he has read and understands this Stipulation and that he 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: 7/23/10  
  
Dr. Stanislav Kruglikov  
Respondent

Dated: 9-11-10  
  
For the Committee

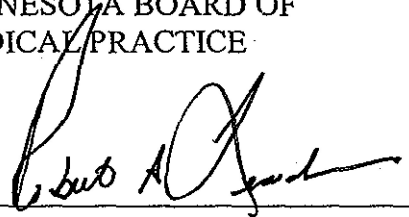
**ORDER**

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

IT IS HEREBY ORDERED that the terms of this Stipulation are adopted and implemented by the Board this 1<sup>st</sup> day of September, 2010.

MINNESOTA BOARD OF  
MEDICAL PRACTICE

By: \_\_\_\_\_

A handwritten signature in black ink, appearing to read "Robert A. Anderson", is written over a horizontal line.

AG: #2665445-v1

**AFFIDAVIT OF SERVICE BY U.S. MAIL**

**Re: In the Matter of the Medical License of Dr. Stanislav Kruglikov  
License No. 43,311**

STATE OF MINNESOTA    )  
                                      ) ss.  
COUNTY OF RAMSEY    )

KATHLEEN DAVIS, being first duly sworn, deposes and says:

That at the City of St. Paul, County of Ramsey and State of Minnesota, on September 13, 2010, s/he caused to be served the STIPULATION AND ORDER, by depositing the same in the United States mail at said city and state, true and correct copy(ies) thereof, properly enveloped with prepaid first class postage, and addressed to:

**PERSONAL AND CONFIDENTIAL**

Dr. Stanislav Kruglikov  
215 10<sup>th</sup> Avenue South, Apartment 534  
Minneapolis, MN 55415

  
KATHLEEN DAVIS

Subscribed and sworn to before me on  
September 13, 2010.

  
NOTARY PUBLIC

