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

\* \* \* \* \*

**In The Matter of Charges and** )  
)  
**Complaint Against** )  
)  
**EDWARD MICHAEL OUTLAW, M.D.,** )  
)  
**Respondent.** )

Case No. 11-28023-1

**FILED**

**JUL 12 2011**

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS

By: *[Signature]*

**COMPLAINT**

The Investigative Committee of the Nevada State Board of Medical Examiners, comprised at the time of authorizing the filing of this complaint, Charles N. Held, M.D., Chairman, Theodore B. Berndt, M.D., Member, and Valerie J. Clark, BSN, RHU, LUTCF, Member, by and through Bradley O. Van Ry, Deputy General Counsel, having a reasonable basis to believe that Edward Michael Outlaw, M.D., hereinafter referred to as "Respondent", has violated the provisions of NRS Chapter 630, hereby issues its formal Complaint, stating the Investigative Committee's charges and allegations, as follows:

1. Respondent is currently licensed in active status (License No. 10630), and has been so licensed since September 8, 2003 by the Nevada State Board of Medical Examiners pursuant to the provisions of Chapter 630 of the Nevada Revised Statutes.

2. On or about October 27, 2010, the Nevada State Board of Medical Examiners discovered that Respondent had abandoned numerous medical records in his former home at 1877 Glory Lily Ct., Las Vegas, Nevada 89123.

3. The medical records included patient charts, patient identification and demographics, medical histories, charts, films, etc. These records were left behind by Respondent in a foreclosed, bank owned property.

///

1 Count I

2 4. All of the allegations contained in the above paragraphs are hereby incorporated by  
3 reference as though fully set forth herein.

4 5. Nevada Revised Statute 630.3062(1) provides that the failure to maintain timely,  
5 legible, accurate and complete medical records relating to the diagnosis, treatment and care of a  
6 patient is grounds for initiating disciplinary action against a licensee.

7 6. Respondent failed to maintain timely, legible, accurate and complete medical  
8 records relating to the diagnosis, treatment and care of numerous patients.

9 7. By reason of the foregoing, Respondent is subject to discipline by the Nevada State  
10 Board of Medical Examiners as provided in Section 630.352 of the Nevada Revised Statutes.

11 Count II

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

14 9. Nevada Revised Statute Section 630.3065(1) provides that willful disclosure of a  
15 communication privileged pursuant to a statute or court order is grounds for initiating discipline  
16 against a licensee.

17 10. Respondent's aforementioned willful abandonment of medical records constitutes a  
18 violation of the provisions of NRS 630.3065(1).

19 11. By reason of the foregoing, Respondent is subject to discipline by the  
20 Nevada State Board of Medical Examiners as provided in Section 630.352 of the  
21 Nevada Revised Statutes.

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

23 1. That the Nevada State Board of Medical Examiners give Respondent notice of the  
24 charges herein against him and give him notice that he may file an answer to the Complaint herein  
25 as set forth in Section 630.339 of the Nevada Revised Statutes within twenty (20) days of service  
26 of the Complaint.

27 2. That the Nevada State Board of Medical Examiners set a time and place for a  
28 formal hearing after holding an Early Case Conference pursuant to NRS 630.339(3);

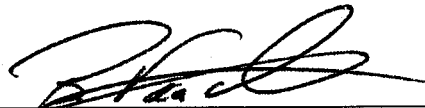
1           3.       That the Nevada State Board of Medical Examiners determine what sanctions it  
2 determines to impose if it determines there has been a violation or violations of the  
3 Medical Practice Act (Nevada Revised Statutes Chapter 630) committed by Respondent; and

4           4.       That the Nevada State Board of Medical Examiners make, issue and serve on  
5 Respondent its findings of facts, conclusions of law and order, in writing, that includes the  
6 sanctions imposed; and

7           5.       That the Nevada State Board of Medical Examiners take such other and further  
8 action as may be just and proper in these premises.

9           DATED this 12<sup>th</sup> day of July, 2011.

10  
11                               INVESTIGATIVE COMMITTEE OF THE  
12                               NEVADA STATE BOARD OF MEDICAL EXAMINERS

13                               By:   
14                               Bradley O. Van Ry, Esq.  
15                               Attorney for the Investigative Committee  
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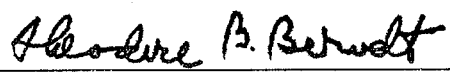
VERIFICATION

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STATE OF NEVADA            )  
  : ss.  
COUNTY OF WASHOE        )

Theodore B. Berndt, M.D., hereby deposes and states under penalty of perjury under the laws of the state of Nevada that he is the Chairman of the Investigative Committee of the Nevada State Board of Medical Examiners that authorized the foregoing Complaint against the Respondent herein; that he has read the foregoing Complaint; and that based upon information discovered during the course of the investigation into a complaint against Respondent, that he believes the allegations and charges in the foregoing Complaint against Respondent are true, accurate, and correct.

Dated this 12<sup>th</sup> day of July, 2011.


  
\_\_\_\_\_  
Theodore B. Berndt, M.D.

**CERTIFICATE OF MAILING**

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 12<sup>th</sup> day of July 2011, I served a file copy of the COMPLAINT, SETTLEMENT LETTER & FINGERPRINT INFORMATION, by mailing via USPS certified mail to the following:

Edward Michael Outlaw, M.D.  
801 S. Rancho, Ste. A3  
Las Vegas, NV 89106

Dated this 12<sup>th</sup> day of July 2011.

  
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Angelia L. Donohoe  
Legal Assistant

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