

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

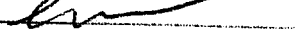
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6 **In the Matter of Charges and**) **Case No. 12-7910-1**
7 **Complaint Against**)
8 **BRADLY S. WALKER, M.D.,**)
9 **Respondent.**)

FILED

SEP 20 2012

**NEVADA STATE BOARD OF
MEDICAL EXAMINERS**

By: 

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11
12 **COMPLAINT**

13 The Investigative Committee (IC) of the Nevada State Board of Medical Examiners
14 (Board), composed at the time of filing of Theodore B. Berndt, M.D., Chairman,
15 Valerie J. Clark, BSN, RHU, LUTCF, Member, and Michael J. Fischer, M.D., Member, by and
16 through Erin L. Albright, Esq., Deputy General Counsel and Attorney for the IC, having a
17 reasonable basis to believe that Bradly S. Walker, M.D. (Respondent), violated the provisions of
18 Nevada Revised Statutes (NRS) Chapter 630 (Medical Practice Act), hereby issues its formal
19 Complaint, stating the IC's charges and allegations as follows:

20 1. Respondent is currently licensed in active status (License No. 7042), and has been
21 so licensed by the Board since March 5, 1994, pursuant to the provisions of the Medical Practice
22 Act.

23 2. Respondent is currently licensed to practice medicine in Nevada, and was so
24 licensed at the time of the incident complained of in this matter in the state of Idaho.

25 3. Upon information and belief, Respondent's controlled substances registration from
26 the Idaho State Board of Pharmacy has been inactive since 2002. Nonetheless, Respondent
27 continued to prescribe controlled substances in the state of Idaho.

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1 12. NRS 630.306(11) provides that the failure by a licensee to report in writing, within
2 thirty (30) days, any disciplinary action taken against the licensee by another state is grounds for
3 initiating discipline against a licensee.

4 13. Respondent failed to report, in writing, to the Board within thirty (30) days the
5 above-outlined disciplinary action taken by the state of Idaho.

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

8 **WHEREFORE**, the IC prays:

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

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


14 3. That the Board determine the sanctions it will impose if it finds Respondent
15 violated the Medical Practice Act;

16 4. That the Board make, issue and serve on Respondent, in writing, its findings of
17 fact, conclusions of law and order, which shall include the sanctions imposed; and

18 5. That the Board take such other and further action as may be just and proper in these
19 premises.

20 DATED this 20th day of September, 2012.

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22 INVESTIGATIVE COMMITTEE OF THE
23 NEVADA STATE BOARD OF MEDICAL EXAMINERS

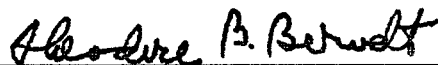
24 By: 
25 Erin L. Albright, Esq.
26 Deputy General Counsel
27 Attorney for the Investigative Committee
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VERIFICATION

1 STATE OF NEVADA)
2 : ss.
3 COUNTY OF WASHOE)

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

11 Dated this 20th day of September, 2012.

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14 Theodore B. Berndt, M.D.

OFFICE OF THE GENERAL COUNSEL
Nevada State Board of Medical Examiners
1105 Terminal Way #301
Reno, Nevada 89502
(775) 688-2559


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CERTIFICATE OF SERVICE

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 20th day of September 2012, I served a filed copy of the Complaint & Fingerprint information via USPS e-certified mail return receipt to the following:

Bradly S. Walker, M.D.
24712 Mosquero Lane
Mission Viejo, CA 92691

Dated this 20th day of September 2012.



Angelia L. Donohoe
Legal Assistant