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

* * * * *

**In the Matter of Charges and
Complaint Against
Prasun Pal, M.D.,
Respondent.**

Case No. 17-40944-1

FILED
AUG 17 2017
**NEVADA STATE BOARD OF
MEDICAL EXAMINERS**
By: 

COMPLAINT

The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners (Board) hereby issues this formal Complaint (Complaint) against Prasun Pal, M.D. (Respondent), a resident formerly licensed in Nevada whose license has expired. After investigating this matter, the IC has a reasonable basis to believe that Respondent has violated provisions of Nevada Revised Statutes (NRS) chapter 630 and Nevada Administrative Code (NAC) chapter 630 (collectively, the Medical Practice Act). The IC alleges the following facts:

1. Respondent was licensed in Nevada in active status (license no. LL2443) by the Board on July 1, 2013, and his license expired on January 29, 2015. Respondent did not renew his license and it is currently expired.

2. On or about March 10, 2015, Respondent was adjudged guilty of two counts of possession of a visual presentation depicting sexual conduct of a child in the Eighth Judicial District Court in Clark County, Nevada.

3. On or about September 17, 2015, Respondent was sentenced in the Eighth Judicial District Court to 28-72 months of incarceration on each count, to run concurrently, which sentence was suspended and Respondent was placed on probation for an indeterminate period not to exceed five years and was required to register as a sex offender.

¹ The Investigative Committee (IC) of the Nevada State Board of Medical Examiners (Board) was composed of Board members Wayne Hardwick, M.D., Chairman, Theodore B. Berndt, M.D, Member, and Mr. M. Neil Duxbury, Member, at the time the IC authorized the filing of this Complaint.

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Count I

NRS 630.301(9) (Engaging in conduct that brings the medical profession into disrepute)

4. NRS 630.301(9) provides that the engaging in conduct that brings the medical profession into disrepute, including, without limitation, conduct that violates any provision of a code of ethics adopted by the Board by regulation based on a national code of ethics is grounds for initiating disciplinary action.

5. Respondent engaged in conduct that brings the medical profession into disrepute by possessing child pornography.

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

Count II

NRS 630.301(11)(d) (Conviction of a sexually related crime)

7. NRS 630.301(11)(d) provides that conviction of sexual assault, statutory sexual seduction, incest, lewdness, indecent exposure or any other sexually related crime is grounds for initiating disciplinary action.

8. Respondent was convicted of two counts of possession of a visual presentation depicting sexual conduct of a child.

9. Based on the facts, Respondent was convicted of two counts of a sexually related crime.

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

Count III

NRS 630.301(11)(g) (Conviction of an offense involving moral turpitude)

11. NRS 630.301(11)(g) provides that conviction of any offense involving moral turpitude is grounds for initiating disciplinary action.

12. Respondent was convicted of two counts of possession of visual presentation depicting sexual conduct of a child, i.e., possession of child pornography.

13. Possession of child pornography is an offense involving moral turpitude.

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WHEREFORE, the IC prays that the Board:

14. Give Respondent notice of the charges set forth in this Complaint;

15. Give Respondent notice that Respondent may file an answer to the Complaint as set forth in NRS 630.339(2) within 20 days of service of the Complaint;

16. Set a time and place for a formal hearing after holding an Early Case Conference pursuant to NRS 630.339(3);

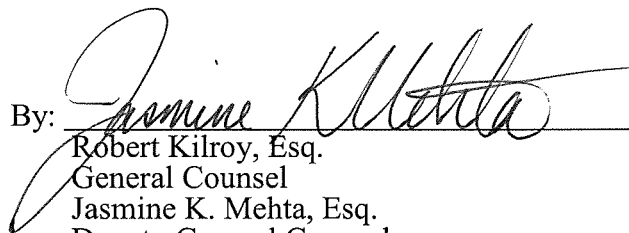
17. Determine the sanctions it will impose if it finds Respondent violated the Medical Practice Act;

18. Make, issue, and serve on Respondent, in writing, its findings of fact, conclusions of law and order, which shall include the sanctions, if imposed; and

19. Take such other and further action as may be just and proper in this matter.

Dated this 17th day of August, 2017.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 
Robert Kilroy, Esq.
General Counsel
Jasmine K. Mehta, Esq.
Deputy General Counsel
Attorney for the Investigative Committee


VERIFICATION

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STATE OF NEVADA)
 : ss.
COUNTY OF WASHOE)

Wayne Hardwick, 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 based upon information discovered during the course of the investigation into a complaint against Respondent, he believes the allegations and charges in the foregoing Complaint against Respondent are true, accurate and correct.

Dated this 17th day of August, 2017.



Wayne Hardwick, M.D.
Chairman, Investigative Committee
Nevada State Board of Medical Examiners

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

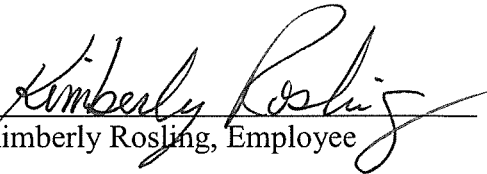
CERTIFICATE OF SERVICE

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I hereby certify that I am employed by the Nevada State Board of Medical Examiners and that on the 17th day of August, 2017, I served a file-stamped copy of the COMPLAINT and FINGERPRINT INFORMATION, via USPS e-certified return receipt mail (9171 9690 0935 0096 2326 41) to the following:

Prasun Pal, M.D.
2040 W. Charleston Blvd., #300
Las Vegas, NV 89102

DATED this 17th day of August, 2017.


Kimberly Rosling, Employee