

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


3 \* \* \* \* \*

4  
5 **In The Matter of Charges and** ) **Case No. 11-18633-1**  
6 **Complaint Against** )  
7 **RAKESH MAGAN NATHU, M.D.,** )  
8 **Respondent.** )  
9 )

**FILED**

**NOV 29 2011**

**NEVADA STATE BOARD OF  
MEDICAL EXAMINERS**

By: 

10  
11 **COMPLAINT**

12 The Investigative Committee of the Nevada State Board of Medical Examiners, composed  
13 at the time of filing of Theodore B. Berndt, M.D., Chairman, Valerie J. Clark, BSN, RHU,  
14 LUTCF, Member, and Michael Fischer, M.D., Member, by and through Bradley O. Van Ry,  
15 Deputy General Counsel, having a reasonable basis to believe that Rakesh M. Nathu, M.D.,  
16 hereinafter referred to as "Respondent", has violated the provisions of NRS Chapter 630, hereby  
17 issues its formal Complaint, stating the Investigative Committee's charges and allegations, as  
18 follows:

19 1. Respondent is currently licensed in active status (License No. 9337), and has been  
20 so licensed since April 10, 2000 by the Nevada State Board of Medical Examiners pursuant to the  
21 provisions of Chapter 630 of the Nevada Revised Statutes.

22 2. Sometime in May 2010, Respondent became the subject of a federal investigation  
23 into his medical billing practices. As a result of the investigation, Respondent agreed to pay \$5.7  
24 million plus interest by settlement agreement on June 8, 2011.

25 **Count I**

26 3. All of the allegations in the above paragraphs are hereby incorporated as if fully set  
27 forth herein.

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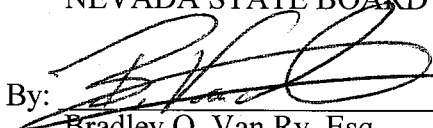
3. That the Nevada State Board of Medical Examiners determine what sanctions it agrees upon to impose if it finds and concludes that there has been a violation or violations of the Medical Practice Act (Nevada Revised Statutes Chapter 630) committed by Respondent;

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

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

DATED this 27<sup>th</sup> day of November, 2011.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:   
Bradley O. Van Ry, Esq.  
Deputy General Counsel and Attorney for the Investigative Committee

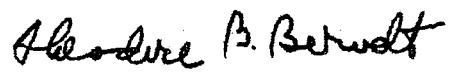
VERIFICATION

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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 29<sup>th</sup> day of November, 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 29<sup>th</sup> day of November 2011, I served a file copy of the COMPLAINT, Settlement Letter & Fingerprint information via USPS e-certified mail to the following:

Rakesh M. Nathu, M.D.  
4770 Rancho Camino Court  
Las Vegas, NV 89129

Dated this 29<sup>th</sup> day of November 2011.

  
\_\_\_\_\_  
Angelia L. Donohoe  
Legal Assistant