BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

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In the Matter of Charges and)	Case No. 12-7910-1	
Complaint Against)	FILED	
BRADLY S. WALKER, M.D.,)	SEP 2 0 2012	
Respondent.)))	NEVADA STATE BOARD OF MEDICAL EXAMINERS By:	

COMPLAINT

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

- 1. Respondent is currently licensed in active status (License No. 7042), and has been so licensed by the Board since March 5, 1994, pursuant to the provisions of the Medical Practice Act.
- 2. Respondent is currently licensed to practice medicine in Nevada, and was so licensed at the time of the incident complained of in this matter in the state of Idaho.
- 3. Upon information and belief, Respondent's controlled substances registration from the Idaho State Board of Pharmacy has been inactive since 2002. Nonetheless, Respondent continued to prescribe controlled substances in the state of Idaho.

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- 4. On or about March 5, 2012, Respondent and the Idaho State Board of Medicine entered into a Stipulation and Order where, in addition to other conditions, Respondent is prohibited for a minimum of five (5) years from prescribing, administering, dispensing, ordering, writing orders for, giving verbal orders for, or possessing any controlled substances in the state of Idaho unless he obtains the required registration with the Idaho State Board of Pharmacy. (See Exhibit 1.)
- 5. If Respondent violates or breaches any terms or conditions of the Stipulation and Order, the Idaho State Board of Medicine reserved the right to institute formal disciplinary proceedings for any and all possible violations and breaches. In addition, if Respondent tests positive on any drug/alcohol screening or relapses, Respondent's license to practice medicine in the state of Idaho shall be summarily suspended by the Idaho State Board of Medicine.
- 6. Furthermore, Respondent omitted, failed and/or refused to notify the Board in a timely manner of the action taken against his medical license by the state of Idaho.

COUNT I

- 7. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- 8. NRS 630.301(3) provides that any disciplinary action, including, without limitation, the revocation, suspension, modification or limitation of a license to practice any type of medicine, taken by another state is grounds for initiating discipline against a licensee.
- 9. The Stipulation and Order limiting Respondent's ability to prescribe, administer, dispense, order, write orders for, give verbal orders for, or possess any controlled substances in the state of Idaho constitutes a disciplinary action taken by another state against Respondent that is grounds for initiating discipline against Respondent.
- 10. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

COUNT II

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

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- 12. NRS 630.306(11) provides that the failure by a licensee to report in writing, within thirty (30) days, any disciplinary action taken against the licensee by another state is grounds for initiating discipline against a licensee.
- Respondent failed to report, in writing, to the Board within thirty (30) days the 13. above-outlined disciplinary action taken by the state of Idaho.
- 14. By reason of the foregoing, Respondent is subject to discipline by the Board as provided in NRS 630.352.

WHEREFORE, the IC prays:

- 1. That the Board give Respondent notice of the charges herein against him and give him notice that he may file an answer to the Complaint herein as set forth in NRS 630.339(2) within twenty (20) days of service of the Complaint;
- 2. That the Board set a time and place for a formal hearing after holding an Early Case Conference pursuant to NRS 630.339(3);
- 3. That the Board determine the sanctions it will impose if it finds Respondent violated the Medical Practice Act;
- 4. That the Board make, issue and serve on Respondent, in writing, its findings of fact, conclusions of law and order, which shall include the sanctions imposed; and
- 5. That the Board take such other and further action as may be just and proper in these premises.

DATED this 20 day of September, 2012.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

Deputy General Counsel

Attorney for the Investigative Committee

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners

VERIFICATION

STATE OF NEVADA)	
COUNTY OF WASHOE) : 5	iS.

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 2019 day of Septenber , 2012.

Hooding 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

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