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

\* \* \* \* \*

**In the Matter of Charges and  
Complaint Against  
William Verne Craig, M.D.,  
Respondent.**

**Case No. 16-44275-1**

**FILED**

**SEP 27 2016**

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS  
By: 

**COMPLAINT**

The Investigative Committee<sup>1</sup> (IC) of the Nevada State Board of Medical Examiners (Board) hereby issues this formal Complaint (Complaint) against William Verne Craig, M.D. (Respondent), a licensed physician in Nevada. 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 to practice medicine in the State of Nevada by the Board, pursuant to the provisions of the Medical Practice Act, on October 16, 2015, and is currently licensed in active status (License No. 16165).

2. Respondent was licensed in the State of New York to practice medicine beginning in 1978.

3. On or about June 23, 2008, the State of New York Department of Health sent a letter to Respondent that an investigation had been opened and concluded, regarding allegations of professional medical misconduct, without further action.

<sup>1</sup> The Investigative Committee of the Nevada State Board of Medical Examiners is composed of Chairman Wayne Hardwick, M.D., and Board members Theodore B. Berndt, M.D., and M. Neil Duxbury.

1 4. On or about September 9, 2015, Respondent signed an Application for Licensure to  
2 practice medicine in the State of Nevada.

3 5. On or about May 31, 2016, the State of New York Department of Health, Office of  
4 Professional Medical Conduct, filed a Statement of Charges against Respondent, alleging that he  
5 negligently engaged in the practice of medicine by prescribing opioid medications to three patients  
6 without adequate medical indication or documentation, in dosage amounts and quantities not  
7 medically indicated or without adequate documentation, and without adequately monitoring the  
8 opioid medications or documenting such monitoring.

9 6. Prior to the filing of the Statement of Charges, Respondent signed an application to  
10 surrender his New York license to practice medicine (New York License No. 136969), based on  
11 failure to maintain adequate records, on or about May 25, 2016.

12 7. On or about June 6, 2016, the New York Office of Professional Medical Conduct  
13 executed a Surrender Order for Respondent to surrender his license to practice medicine in the  
14 State of New York pursuant to Surrender Order BPMC 16-198, which became effective on or  
15 about June 14, 2016.

16 8. On August 18, 2016, the Nevada State Board of Medical Examiners received  
17 communication from Respondent, purportedly dated July 14, 2016, in which Respondent self-  
18 reported the surrender of his New York license to practice medicine.

19 9. In his application to practice medicine in Nevada, Respondent failed to disclose  
20 that he had ever been investigated by a medical licensing board.

21 **COUNT I**

22 **(NRS 630.301(3) (Surrender of License in Another Jurisdiction))**

23 10. All of the allegations in the above paragraphs are incorporated herein as if set forth  
24 in full.

25 11. NRS 630.301(3) provides that any disciplinary action, including, without  
26 limitation, the surrender of the license or discontinuing the practice of medicine while under  
27 investigation by any licensing authority is grounds for the initiation of disciplinary action.

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1 12. Respondent's New York license was surrendered effective June 14, 2016, resulting  
2 in a violation of NRS 630.301(3).

3 13. By reason of the foregoing, Respondent is subject to discipline by the Nevada State  
4 Board of Medical Examiners as provided in NRS 630.352.

5 **COUNT II**  
6 **(NRS 630.306(1)(k) (Failure to Timely Report Surrender of License))**

7 14. All of the allegations in the above paragraphs are incorporated herein as if set forth  
8 in full.

9 15. NRS 630.306(1)(k) provides that failure by a licensee to report the revocation,  
10 suspension or surrender of a license to practice medicine in another jurisdiction within thirty days  
11 is grounds for initiating disciplinary action.

12 16. Respondent failed to report the surrender of his New York medical privileges to the  
13 Board within thirty days, resulting in a violation of NRS 630.306(1)(k).

14 17. By reason of the foregoing, Respondent is subject to discipline by the Nevada State  
15 Board of Medical Examiners as provided in NRS 630.352.

16 **COUNT III**  
17 **(NRS 630.304(1) (Obtaining/Maintaining a License by Misrepresentation))**

18 18. All of the allegations in the above paragraphs are incorporated herein as if set forth  
19 in full.

20 19. NRS 630.304(1) provides that obtaining, maintaining or renewing a license to  
21 practice medicine by means of bribery, fraud or misrepresentation or by any false, misleading,  
22 inaccurate or incomplete statement is grounds for initiating disciplinary action.

23 20. On Respondent's 2015 application for a Nevada license to practice medicine,  
24 Respondent failed to disclose the investigation of his New York license by the State of New York,  
25 resulting in a violation of NRS 630.304(1).

26 21. By reason of the foregoing, Respondent is subject to discipline by the Nevada State  
27 Board of Medical Examiners as provided in NRS 630.352.

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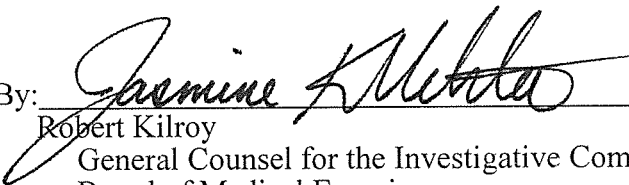
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WHEREFORE, the Investigative Committee prays:

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 upon the 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 27<sup>th</sup> day of September, 2016.

INVESTIGATIVE COMMITTEE OF  
THE NEVADA STATE BOARD OF MEDICAL EXAMINERS


By:   
Robert Kilroy  
General Counsel for the Investigative Committee of the Nevada State Board of Medical Examiners  
Jasmine K. Mehta  
Deputy General Counsel for the Investigative Committee of the Nevada State Board of Medical Examiners

VERIFICATION

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 that 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 27<sup>th</sup> day of September, 2016.

  
Wayne Hardwick, M.D.

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

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# Nevada State Board of Medical Examiners

## Affidavit of Service

I, Lara Ward, Investigator, Las Vegas Office for the Nevada State Board of Medical Examiners, received the following documents on September 28, 2016 for personal service on William Craig, M.D located at 3370 South Highway 160, Ste 9 Pahrump, NV 89048 Case No: 16-16629

1.  Complaint
2.  Complaint and Request for Summary Suspension
3.  Order of the Board
4.  Other for Psychosexual evaluation

I was able to serve process by hand delivering copies of the above documents to William Craig, M.D located at 3370 South Highway 160, Ste 9 Pahrump, NV 89048 on September 28, 2016. Present with me was Don Andreas, Deputy Chief of Investigations, Las Vegas Office.

Signed this 28<sup>th</sup> day of September, 2016.  
Under Penalty of Perjury:

  
\_\_\_\_\_

COUNTY OF CLARK  
STATE OF NEVADA

SUBSCRIBED and SWORN to before me  
This 28 day of September, 2016

  
\_\_\_\_\_  
Notary Public

