

BEFORE THE BOARD OF MEDICAL EXAMINERS
OF THE STATE OF NEVADA

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In the Matter of Charges and)
Complaint Against)
Usha Kiran Nuthi, M.D.,)
Respondent.)

Case No. 17-42879-1

FILED

FEB 28 2017

NEVADA STATE BOARD OF
MEDICAL EXAMINERS

By: _____

COMPLAINT

The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners, having a reasonable basis to believe that Usha Kiran Nuthi, M.D. (hereinafter referred to as Dr. Nuthi or Respondent), has violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical Practice Act), hereby issues its formal Complaint, stating the IC's charges and allegations, as follows:

Respondent's Licensure Status

1. Respondent is currently licensed in active status (License No. 15593), and was so licensed on October 20, 2014, by the Nevada State Board of Medical Examiners, pursuant to the provisions of NRS Chapter 630.

2. On or about December 16, 2015, Respondent entered into a Joint Petition, Stipulation, and Consent Order with the Alabama State Board of Medical Examiners, in which she admitted that her Alabama Controlled Substances Certificate expired by operation of law on December 31, 2014; she did not renew the Certificate until March 3, 2015; and she prescribed controlled substances in the State of Alabama during the period from January 1, 2015 through

¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time the filing of this Complaint was approved, was composed of Theodore B. Berndt, M.D., Wayne Hardwick, M.D., and Mr. M. Neil Duxbury.

1 March 2, 2015. Pursuant to the Consent Order, Dr. Nuthi was assessed an administrative fine of
2 \$5,000.00.

3 3. At no time did Respondent report in writing to the Nevada State Board of Medical
4 Examiners that disciplinary action had been taken against her by the Alabama State Board of
5 Medical Examiners.

6 **Count I**

7 4. All of the allegations contained in the above paragraphs are hereby incorporated by
8 reference as though fully set forth herein.

9 5. NRS 630.301(3) provides that any disciplinary action, including the revocation,
10 suspension, modification or limitation of a license to practice any type of medicine, taken by
11 another state is grounds for initiating disciplinary action against a licensee.

12 6. Respondent entered into a Consent Order with the Alabama State Board of Medical
13 Examiners, which Consent Order is a disciplinary action.

14 7. 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 II**

17 8. All of the allegations contained in the above paragraphs are hereby incorporated by
18 reference as though fully set forth herein.

19 9. NRS 630.306(1)(k) provides that failure by a licensee or applicant to report in
20 writing, within 30 days, any disciplinary action taken against the licensee or applicant by another
21 state, the Federal Government or a foreign country, including, without limitation, the revocation,
22 suspension or surrender of a license to practice medicine in another jurisdiction, is grounds for
23 initiating disciplinary action.

24 10. Respondent was disciplined by the Alabama State Board of Medical Examiners as
25 described above and assessed an administrative fine.

26 11. Respondent failed to timely report the disciplinary action taken by the Alabama State
27 Board of Medical Examiners.

28 12. Accordingly, Respondent is in violation of NRS 630.306(1)(k).


VERIFICATION

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STATE OF NEVADA)
 : ss.
COUNTY OF WASHOE)

Wayne Hardwick, M.D., having been duly sworn, hereby deposes and states under penalty of perjury that he is the Chairman of the Investigative Committee of the Nevada State Board of Medical Examiners that authorized the Complaint against the Respondent herein; that he has read the foregoing Complaint; and that based upon information discovered in the course of the investigation into a complaint against Respondent, he believes that the allegations and charges in the foregoing Complaint against Respondent are true, accurate, and correct.

DATED this 28th day of February, 2017.



Wayne Hardwick, M.D.

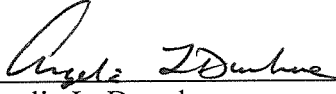
CERTIFICATE OF MAILING

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I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 28th day of February 2017; I served a file copy of COMPLAINT & Fingerprint Information, via USPS certified electronic return receipt mail to the following:

Usha Kiran Nuthi, M.D.
44 Ledge View Dr.
Huntsville, AL 35802

Dated this 28th day of February, 2017.



Angelia L. Donohoe
Legal Assistant