

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

* * * * *


**In the Matter of Charges and
Complaint Against
ADAM JAMES LUCKETTE, PA-C,
Respondent.**

Case No. 18-34553-1

FILED

NOV - 1 2018

**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 Adam James Luckette, PA-C (Respondent), a physician assistant licensed 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:

A. Respondent's Failure to Maintain Complete and Accurate Medical Records.

1. Respondent is a physician assistant licensed to practice medicine in the State of Nevada (License No. PA1149). He has been continuously licensed by the Board since January 12, 2009.

2. At all times relevant to this Complaint, Respondent was the supervisee and employee of Ivan Lee Goldsmith, M.D.

3. Respondent's medical records, maintained at the direction of both Respondent and Dr. Goldsmith, indicate that Respondent dispensed controlled substances to patients of Dr. Goldsmith, from Dr. Goldsmith's store of medications, while Dr. Goldsmith was out of the country and otherwise not on-site at the dispensing facility, and that Respondent prescribed

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

1 medication to patients of Dr. Goldsmith, without a bona fide therapeutic relationship with said
2 patients.

3 4. Respondent denies that he dispensed controlled substances to patients of
4 Dr. Goldsmith, from Dr. Goldsmith's store of medications, while Dr. Goldsmith was out of the
5 country and otherwise not on-site at the dispensing facility, and denies that Respondent prescribed
6 medication to patients of Dr. Goldsmith without a bona fide therapeutic relationship with said
7 patients.

8 5. On information and belief, Respondent failed to maintain accurate and complete
9 records regarding the aforementioned prescribing and dispensing activity.

10 **Count I**

11 **NRS 630.3062(1)(a) (Failure to Maintain Complete and Accurate Medical Records)**

12 6. All of the allegations contained in the above paragraphs are hereby incorporated by
13 reference as though fully set forth herein.

14 7. NRS 630.3062(1)(a) provides that the failure to maintain timely, legible, accurate
15 and complete medical records relating to the diagnosis, treatment and care of a patient is grounds
16 for initiating discipline against a licensee.

17 8. Respondent failed to maintain complete and accurate medical records relating to
18 the diagnosis, treatment and care of the patients to whom Respondent dispensed and prescribed
19 controlled substances as described in this Section A.

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

22 ///

23 ///

24 ///

25

26

27

28


1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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 what sanctions to impose if it determines there has been a violation or violations of the Medical Practice Act committed by Respondent;
4. That the Board make, issue and serve on Respondent its findings of fact, conclusions of law and order, in writing, that includes 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 1 day of November, 2018.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 

Aaron Bart Fricke, Esq., Deputy General Counsel
Attorney for the Investigative Committee

VERIFICATION

1 STATE OF NEVADA)
2 : ss.
3 COUNTY OF WASHOE)

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

10 DATED this 15th day of November, 2018.

11 INVESTIGATIVE COMMITTEE OF THE
12 NEVADA STATE BOARD OF MEDICAL EXAMINERS

13 *Wayne Hardwick*

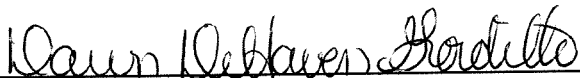
14 _____
Wayne Hardwick, M.D., Chairman

CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 1st day of November 2018; I served a file copy of the COMPLAINT and Fingerprinting information via USPS e-certified return receipt mail to the following:

Adam Lockette
6 Via Del Cielo
Henderson, NV 89011

Dated this 1st day of November, 2018.


Dawn DeHaven Gordillo
Legal Assistant