

1 5. Violation of a standard of practice adopted by the Board is grounds for disciplinary
2 action pursuant to NRS 630.306(1)(b)(2).

3 6. The Board adopted by reference the *Model Policy on the Use of Opioid Analgesics*
4 *in the Treatment of Chronic Pain*, July 2013, published by the Federation of State Medical Boards
5 of the United States, Inc. (Model Policy).

6 7. Pursuant to NAC 630.230(1)(k), a licensee shall not engage in the practice of
7 writing prescriptions for controlled substances to treat acute pain or chronic pain in a manner that
8 deviates from the policies set forth in the *Model Policy on the Use of Opioid Analgesics in the*
9 *Treatment of Chronic Pain* adopted by reference in NAC 630.187.

10 8. Respondent wrote prescriptions to Patient A for opioid analgesics to treat chronic
11 pain in a manner that deviated from the Model Policy.

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

14 **WHEREFORE**, the Investigative Committee prays:

15 1. That the Board give Respondent notice of the charges herein and give notice that
16 an answer to the Complaint herein may be filed as set forth in NRS 630.339(2) within twenty (20)
17 days of service of the Complaint;

18 2. That the Board set a time and place for a formal hearing after holding an Early
19 Case Conference pursuant to NRS 630.339(3);

20 3. That the Board determine what sanctions to impose if it determines there has been
21 a violation or violations of the Medical Practice Act committed by Respondent;

22 4. That the Board make, issue and serve on Respondent its findings of fact,
23 conclusions of law and order, in writing, that includes the sanctions imposed; and

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5. That the Board take such other and further action as may be just and proper in these premises.

DATED this 22 day of October, 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

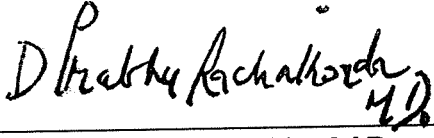
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STATE OF NEVADA)
 : ss.
COUNTY OF CLARK)

Rachakonda D. Prabhu, 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 22nd day of October, 2018.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS



Rachakonda D. Prabhu, M.D.