

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

3 * * * * *

4 **In the Matter of Charges and**
5 **Complaint Against**
6 **GEORGES YOUSSEF TANNOURY, M.D.,**
7 **Respondent.**

Case No. 18-12169-1

FILED

AUG 15 2018

NEVADA STATE BOARD OF
MEDICAL EXAMINERS
By: 

9 **COMPLAINT**

10 The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners (Board)
11 hereby issues this formal Complaint (Complaint) against Georges Youssef Tannoury, M.D.
12 (Respondent), a physician licensed in Nevada. After investigating this matter, the IC has a
13 reasonable basis to believe that Respondent has violated provisions of Nevada Revised Statutes
14 (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical
15 Practice Act). The IC alleges the following facts:

16 1. Respondent is a physician licensed to practice medicine in the State of Nevada
17 (License No. 8820). He has been continuously licensed by the Board since October 15, 1998.

18 **A. Respondent's Treatment of Patient A**

19 2. Respondent was a close acquaintance of Patient A. Patient A's true identity is not
20 disclosed herein to protect his or her privacy, but is disclosed in the Patient Designation served
21 upon Respondent along with a copy of this Complaint.

22 3. From February 2000 to September 2011, Respondent prescribed controlled
23 substances to Patient A, including opioids and appetite suppressants.

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28 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, Theodore
B. Berndt, M.D., and Mr. M. Neil Duxbury.

COUNT I

NRS 630.306(1)(b)(2) (Violation of Standards of Practice)

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

5. Respondent treated Patient A for chronic pain with opioid analgesics.

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

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

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

9. On information and belief, Respondent wrote prescriptions to Patient A for opioid analgesics to treat chronic pain in a manner that deviated from the Model Policy.

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

COUNT II

NRS 630.306(1)(b)(2) (Violation of Standards of Practice)

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

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

13. The Board adopted by reference the *Dietary Guidelines for Americans*, 2010, 7th edition, published jointly by the United States Department of Health and Human Services and the Department of Agriculture pursuant to 7 U.S.C. § 5341 (Dietary Guidelines).

1 14. NAC 630.205 sets forth the professional standards for the prescription of appetite
2 suppressants, which specifically incorporates the Dietary Guidelines.

3 15. Respondent wrote prescriptions to Patient A for appetite suppressants in a manner
4 that deviated from the professional standards for the prescription of appetite suppressants and the
5 Dietary Guidelines.

6 16. By reason of the foregoing, Respondent is subject to discipline by the Board as
7 provided in NRS 630.352.

8 **Count III**

9 **NRS 630.3062(1)(a) (Failure to Maintain Complete Medical Records)**

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

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

15 19. Respondent failed to maintain complete medical records relating to the diagnosis,
16 treatment and care of Patient A.

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

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

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

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

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


27 4. That the Board make, issue and serve on Respondent its findings of fact,
28 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 15 day of August, 2018.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

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

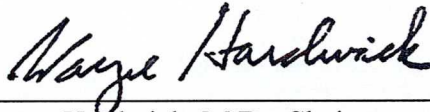
VERIFICATION

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 August, 2018.

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

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14 _____
Wayne Hardwick, M.D., Chairman

OFFICE OF THE GENERAL COUNSEL
Nevada State Board of Medical Examiners
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Reno, Nevada 89521
(775) 688-2559

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CERTIFICATE OF SERVICE

I hereby certify that I am employed by the Nevada State Board of Medical Examiners and that on the 15th day of August, 2018, I served a file-stamped copy of the COMPLAINT, PATIENT DESIGNATION and FINGERPRINT INFORMATION, via USPS e-certified return receipt mail (_____) to the following:

GEORGES YOUSSEF TANNOURY
3144 BEACH VIEW CT.
LAS VEGAS, NV 89117

DATED this 15th day of August, 2018.

Dawn DeHaven Gordillo
Dawn DeHaven Gordillo, Legal Assistant