

1 California medical license was revoked, with such revocation stayed, and with Respondent placed
2 on probation for three (3) years pending the fulfillment of certain conditions.

3 3. Respondent did not timely report the Settlement and Order to the Nevada State
4 Board of Medical Examiners.

5 **Count I**

6 **(NRS 630.301(3))**

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. On or about October 20, 2017, the Medical Board of California filed the Settlement
13 and Order, which became effective November 17, 2018.

14 7. The Settlement and Order was a disciplinary action taken by another state.

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

17 **Count II**

18 **(NRS 630.306(1)(k))**

19 9. All of the allegations contained in the above paragraphs are hereby incorporated by
20 reference as though fully set forth herein.

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

26 11. Respondent was disciplined by the Medical Board of California as described above.

27 12. Respondent failed to timely report the disciplinary action taken by the Medical Board
28 of California.

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13. Accordingly, Respondent has violated NRS 630.306(1)(k).

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

WHEREFORE, the Investigative Committee prays:

1. That the Nevada State Board of Medical Examiners 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 Nevada State Board of Medical Examiners set a time and place for a formal hearing after holding an Early Case Conference pursuant to NRS 630.339(3);


3. That the Nevada State Board of Medical Examiners 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 Nevada State Board of Medical Examiners 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 Nevada State Board of Medical Examiners take such other and further action as may be just and proper in these premises.

DATED this 14 day of May, 2018.

INVESTIGATIVE COMMITTEE OF
THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 
Robert Kilroy, Esq., General Counsel
Aaron Bart Fricke, Esq., Deputy General Counsel
Attorneys for the Investigative Committee

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 14th day of May, 2018.



Wayne Hardwick, M.D.