

OFFICE OF THE GENERAL COUNSEL  
Nevada State Board of Medical Examiners  
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BEFORE THE BOARD OF MEDICAL EXAMINERS  
OF THE STATE OF NEVADA

\* \* \* \* \*

In the Matter of Charges and  
Complaint Against  
EDWARD MICHAEL OUTLAW, M.D.,  
Respondent.

Case No. 19-28023-1

FILED

MAR 19 2019

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS  
By: \_\_\_\_\_

COMPLAINT

The Investigative Committee<sup>1</sup> (IC) of the Nevada State Board of Medical Examiners (Board) hereby issues this formal Complaint (Complaint) against Edward Michael Outlaw, M.D. (Respondent), a physician 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:

1. Respondent is, and was at all times relevant to this case, a physician licensed to practice medicine in the State of Nevada (License No. 10630). His license was originally issued by the Board on September 8, 2003.

2. On or about May 19, 2015, a warrant for the arrest of Respondent was issued by the Eighth Judicial District Court of Clark County, Nevada, in Case No. A-13-683202-F (Civil Case). The Civil Case is a lawsuit to collect on a judgment of \$80,504.49, plus interest and fees, owed by Respondent to Bankers Healthcare Group, Inc. The court in the Civil Case determined that Respondent had "violated various Orders of this Court, including his failure to abide by the Court's Amended Order to Show Cause filed April 9, 2015 and has otherwise been found to be in contempt," and the court therefore ordered Respondent to be arrested by any available sheriff, marshall, or other peace officer in Nevada. As of the time of this Complaint, the warrant for the

<sup>1</sup> 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.

1 arrest of Respondent is still outstanding, and the judgment remains unsatisfied.

2 3. On July 17, 2015, Respondent filed a Notification of Address Change with the  
3 Board, pursuant to NRS 630.254, instructing the Board to address all communications from the  
4 Board to the licensee at 601 S. Rancho Road, Suite A3, Las Vegas, NV 89106.

5 4. On or about October 31, 2016, Respondent's Controlled Substance License with  
6 the Nevada State Board of Pharmacy expired.

7 5. On March 15, 2017, pursuant to NRS 630.311(1), the Investigative Committee (IC)  
8 of the Board ordered Respondent to appear before it to give testimony regarding an ongoing  
9 investigation on Friday, May 19, 2017 (IC Order to Appear). The IC Order to Appear was sent  
10 via certified mail to 601 S. Rancho Rd., Suite A3, Las Vegas, NV 89106, as previously instructed  
11 by Respondent.

12 6. On March 30, 2017, the IC Order to Appear was returned to the IC marked "Return  
13 to Sender, Not Deliverable as Addressed Unable to Forward."

14 7. Respondent did not appear at the May 19, 2017 meeting of the IC as ordered.

15 8. On June 7, 2017, Respondent filed with the Board a Renewal Application, wherein  
16 he applied to renew his license in "Inactive" status, paid the applicable fee, and informed the  
17 Board that his new address was 10926 Merritt Drive, Stockton, CA 95219.

18 9. On or about November 15, 2017, the California Medical Board issued a license to  
19 Respondent, which license is currently active.

20 **COUNT I**

21 **NRS 630.3065(2)(a)**

22 **(Failing to Comply With a Lawful Order of the Investigative Committee)**

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

25 11. NRS 630.3065(2)(a) provides that knowingly or willfully failing to comply with an  
26 order of a committee designated by the Board to investigate a complaint against a physician, i.e.,  
27 the IC, is grounds for initiating disciplinary action.

28 12. Respondent knowingly and willfully failed to comply with the IC Order to Appear.

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

3 **COUNT II**

4 **NRS 630.306(1)(j)**

5 **(Failing to Timely Notify the Board of a Change of Permanent Address)**

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

8 15. NRS 630.306(1)(j) provides that failing to comply with the requirements of NRS  
9 630.254 is grounds for initiating disciplinary action.

10 16. NRS 630.254 provides, in pertinent part:

11 Each licensee shall maintain a permanent mailing address with the Board to which  
12 all communications from the Board to the licensee must be sent. A licensee who  
13 changes his or her permanent mailing address shall notify the Board in writing of  
14 the new permanent mailing address within 30 days after the change. If a licensee  
15 fails to notify the Board in writing of a change in his or her permanent mailing  
16 address within 30 days after the change, the Board:

- 17 (a) May impose upon the licensee a fine not to exceed \$250; and  
18 (b) May initiate disciplinary action against the licensee as provided  
19 pursuant to paragraph (j) of subsection 1 of NRS 630.306.

20 17. Respondent violated NRS 630.254 by failing to notify the Board of his new  
21 permanent mailing address within 30 days of him changing it.

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

24 **COUNT III**

25 **NRS 630.301(9) (Disreputable Conduct)**

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

28 20. NRS 630.301(9) provides that engaging in conduct that brings the medical  
profession into disrepute is grounds for initiating disciplinary action.

21. Respondent's conduct, including, but not limited to, violating numerous orders of  
the Eighth Judicial District Court of Nevada, being found in contempt of that court and having an

1 outstanding warrant issued for Respondent's arrest in the state, failing for more than three years  
2 not only to resolve the arrest warrant but also to answer for the judgment for unpaid debt, and  
3 absconding from the state to avoid the foregoing, is conduct that brings the medical profession  
4 into disrepute.

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

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

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

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

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


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

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

19 DATED this 19 day of March, 2019.

20 INVESTIGATIVE COMMITTEE OF THE  
21 NEVADA STATE BOARD OF MEDICAL EXAMINERS

22 By: \_\_\_\_\_

23   
24 Aaron Bart Fricke, Esq., Deputy General Counsel  
25 Attorney for the Investigative Committee  
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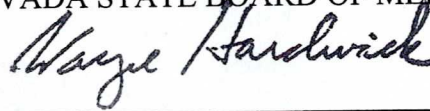
VERIFICATION

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 19<sup>th</sup> day of March, 2019.

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

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Wayne Hardwick, M.D., Chairman