

OFFICE OF THE GENERAL COUNSEL  
Nevada State Board of Medical Examiners  
9600 Gateway Drive  
Reno, Nevada 89521  
(775) 688-2559

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 **EDWARD MICHAEL OUTLAW, M.D.,**  
7 **Respondent.**

Case No. 19-28023-3

**FILED**

NOV 13 2019

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS  
By: 

9 **COMPLAINT**

10 The Investigative Committee<sup>1</sup> (IC) of the Nevada State Board of Medical Examiners (Board)  
11 hereby issues this formal Complaint (Complaint) against Edward Michael Outlaw, 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, or MPA). The IC alleges the following facts:

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

19 **COUNT I**

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

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

23 3. Respondent treated Patient A for chronic pain with opioid analgesics. Patient A's  
24 true identity is not disclosed herein to protect his or her privacy, but is disclosed in the Patient  
25 Designation served upon Respondent along with a copy of this Complaint.

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27  
28 <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 Mr. M. Neil Duxbury, Chairman,  
Aury Nagy, M.D., and Michael C. Edwards, M.D., FACS.

1 4. 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 5. Pursuant to NAC 630.187, the Board adopted by reference the *Model Policy on the*  
4 *Use of Opioid Analgesics in the Treatment of Chronic Pain*, July 2013, published by the  
5 Federation of State Medical Boards of the United States, Inc. (Model Policy).

6 6. 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 Model Policy.

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

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

13 **COUNT II**

14 **NRS 630.3062(1)(a) (Failure to Maintain Proper Medical Records)**

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

17 10. NRS 630.3062(1)(a) provides that the failure to maintain timely, legible, accurate  
18 and complete medical records relating to the diagnosis, treatment and care of a patient is grounds  
19 for initiating disciplinary action against a licensee.

20 11. Respondent failed to maintain complete medical records relating to the diagnosis,  
21 treatment and care of Patient A, by failing to document his actions in complying with the Model  
22 Policy, including, but not limited to, failing to document the following: physical examinations  
23 before prescribing opioid analgesics; urine toxicology screen results and monitoring patient  
24 compliance with testing and adapting his treatment plan based on patient compliance; querying the  
25 Nevada Prescription Monitoring Program; patient progress toward discontinuation of opioid  
26 therapy.

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


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**WHEREFORE**, the Investigative Committee prays:

1. That the Board give Respondent notice of the charges herein and give notice that an answer to the Complaint herein may be filed 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 13 day of November, 2019.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

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

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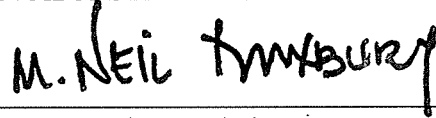
**VERIFICATION**

STATE OF NEVADA        )  
                                  : ss.  
COUNTY OF WASHOE    )

Mr. M. Neil Duxbury, 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 13<sup>th</sup> day of November, 2019.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS



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M. Neil Duxbury, Chairman