

1 14. Respondent failed to maintain complete medical records relating to the diagnosis,
2 treatment and care of Patient A, by failing to document his actions in complying with the Model
3 Policy, including, but not limited to, failing to document the following: physical examinations
4 before prescribing opioid analgesics; queries of the PMP before prescribing opioid analgesics;
5 urinalysis before and after prescribing opioid analgesics; support for his diagnoses with physical
6 examination findings; treatment objectives to evaluate treatment progress; monitoring and
7 adapting his treatment plan; progress toward discontinuation of opioid therapy.

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

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

11 1. That the Board give Respondent notice of the charges herein against him and give
12 him notice that he may file an answer to the Complaint herein as set forth in NRS 630.339(2)
13 within twenty (20) days of service of the Complaint;

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


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

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

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

22 DATED this 20 day of August, 2019.

23 INVESTIGATIVE COMMITTEE OF THE
24 NEVADA STATE BOARD OF MEDICAL EXAMINERS

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

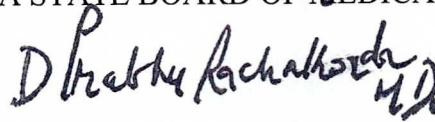
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STATE OF NEVADA)
 : ss.
COUNTY OF CLARK)

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 20th day of August, 2019.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS



Rachakonda D. Prabhu, M.D., Chairman

OFFICE OF THE GENERAL COUNSEL

Nevada State Board of Medical Examiners
9600 Gateway Drive
Reno, Nevada 89521
(775) 688-2559

CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 21st day of August, 2019; I served a filed copy of the COMPLAINT (19-34006-1), via USPS e-certified return receipt mail to the following:

Law Offices of Lyn E. Beggs, PLLC
Lyn E. Beggs, Esq
316 California Ave, #863
Reno, NV 89509

Dated this 21st day of August, 2019.



Dawn DeHaven Gordillo
Legal Assistant