

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

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4
5 **In the Matter of Charges and Complaint**
6 **Against**
7 **VICTORIA K. WALL, M.D.,**
8 **Respondent.**

Case No. 20-18832-1

FILED

SEP - 8 2020

NEVADA STATE BOARD OF
MEDICAL EXAMINERS

By: 

9
10 **COMPLAINT**

11 The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners
12 (Medical Board), by and through Donald K. White, Esq., Deputy General Counsel and attorney for
13 the IC, having a reasonable basis to believe that Victoria K. Wall, M.D. (Respondent) violated the
14 provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC)
15 Chapter 630 (collectively, the Medical Practice Act), hereby issues its Complaint, stating the IC's
16 charges and allegations as follows:

- 17 1. Respondent was at all times relative to this Complaint a medical doctor holding an
18 inactive license to practice medicine in the State of Nevada (License No. 12154).
- 19 2. Respondent was initially licensed by the Medical Board on January 5, 2007.
- 20 3. Respondent voluntarily put her license in inactive status in or about May 2009 and
21 has remained inactive to present, and pursuant to NRS 630.255, the licensee must meet conditions
22 before resuming the practice of medicine in this State, to which Respondent did not comply.
- 23 4. Pursuant to NRS 630.020, prescribing controlled substances is the practice of
24 medicine.
- 25 5. Pursuant to NRS 639.235(1), no person other than a practitioner holding a license to
26 practice his or her profession in this State may prescribe or write a prescription.

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28 ¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time this formal Complaint
was authorized for filing, was composed of Board members M. Neil Duxbury, Chairman, Aury Nagy, M.D., and
Michael C. Edwards, M.D., FACS.

Count VI – Patient D

NRS 630.306(1)(c) (Unlawful Prescribing of a Controlled Substance or Dangerous Drug)

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

37. Patient D’s true identity is not disclosed herein to protect his or her privacy but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

38. NRS 630.306(1)(c) provides that administering, dispensing or prescribing any controlled substance, or any dangerous drug as defined in chapter 454 of NRS, to or for himself or herself or to others except as authorized by law constitutes grounds for initiating disciplinary action.

39. Respondent prescribed Patient D a controlled substance in or about December 2012.

40. Respondent did not have an active license to practice medicine, prescribing controlled substances is the practice of medicine, and therefore, these prescriptions were not authorized by law.

41. 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 Board 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 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

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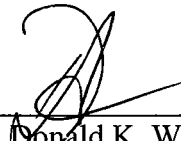
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5. That the Board take such other and further action as may be just and proper in these premises.

DATED this 8th day of September, 2020.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 
Donald K. White, Esq., Deputy General Counsel
Attorney for the Investigative Committee

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

VERIFICATION

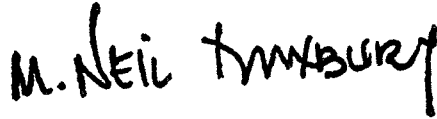
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STATE OF NEVADA)
 : ss.
COUNTY OF WASHOE)

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 8th day of September, 2020.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS



By: _____
M. Neil Duxbury, Chairman