

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

3 * * * * *

4 **In the Matter of Charges and Complaint**

Case No. 20-12252-1

5 **Against:**

6 **VICTOR RONALD BRUCE, M.D.,**

7 **Respondent.**

FILED
NOV 23 2020
NEVADA STATE BOARD OF
MEDICAL EXAMINERS
By: 

8
9 **FIRST AMENDED COMPLAINT**

10 The Investigative Committee (IC)¹ of the Nevada State Board of Medical Examiners
11 (Board), by and through Aaron Bart Fricke, Esq., Senior Deputy General Counsel and attorney for
12 the IC, having a reasonable basis to believe that Victor Ronald Bruce, M.D. (Respondent),
13 violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 and the Nevada
14 Administrative Code (NAC) Chapter 630 (collectively Medical Practice Act), hereby issues its
15 First Amended Complaint (Amended Complaint), stating the IC's charges and allegations as
16 follows:

17 1. Respondent is a medical doctor currently licensed in active-restricted status by the
18 Board pursuant to Chapter 630 of the Nevada Revised Statutes (NRS) and Chapter 630 of the Nevada
19 Administrative Code (NAC) (collectively, the Medical Practice Act). His license was originally
20 issued on September 7, 2018 (License No. 18273).

21 2. Bernard Kofi Addo-Quaye, M.D. (Addo-Quaye) was at all times relative to this
22 Amended Complaint a licensed medical doctor holding an active license to practice medicine in the
23 State of Nevada (License No. 9413). Addo-Quaye was originally licensed by the Board on
24 June 13, 2000.

25 3. On October 23, 2014, in the matter of United States of America v. Victor Bruce, MD,
26 United States District Court, District of Nevada, Case No. 2: 13-cr-0041-APG-CWH, the Court

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28 ¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time this formal
Amended Complaint was authorized for filing, was composed of Board members Victor M. Muro, M.D., Chairman,
Ms. April Mastroluca, and Weldon Havins, M.D., J.D.

1 entered its Judgment in a Criminal Case, adjudging Respondent guilty of violating 21 USC §§
2 846, 841(a)(1) and (b)(1)(C), conspiracy to distribute oxycodone, and sentencing him to forty-six
3 (46) months of imprisonment, among other sanctions.

4 4. On December 31, 2014, the Board revoked Respondent's former license to practice
5 medicine (License No. 8652) pursuant to a Settlement Agreement and Order entered by the Board
6 on December 8, 2014.

7 5. Following Respondent's release from incarceration, Respondent submitted to the
8 Board an application for licensure and preceptor plan. After an appearance by Respondent and
9 Addo-Quaye before the Board at a public meeting on September 7, 2018, and good case
10 appearing, the Board issued Respondent an "Active-Restricted" license to practice medicine for
11 the express purpose of permitting him to participate in a preceptorship with Addo-Quaye, whereby
12 Addo-Quaye was to supervise the medical activities of Respondent and report to the Board
13 regarding Respondent's competence to practice medicine. The Board ordered Respondent to
14 complete a one (1) year preceptorship with Addo-Quaye, and explicitly restricted Respondent
15 from prescribing controlled substances for a minimum of twenty-four (24) months or until his
16 probation period lapses, whichever is greater, and subject to prior approval of the Board.

17 6. Addo-Quaye held, at all times relative to this Amended Complaint, a controlled
18 substance registration, Certificate of Registration No. CS10103, issued by the Nevada State Board
19 of Pharmacy (Pharmacy Board).

20 7. Respondent, at all times relative to this Amended Complaint, did not hold a
21 controlled substance registration, or any other kind of license to prescribe controlled substances,
22 issued by the Pharmacy Board.

23 8. Addo-Quaye, at all times relative to this Amended Complaint, was the proprietor of
24 "Bernard Addo-Quaye, MD PC," dba "TruCare Medical Center" ("TruCare"). TruCare is located
25 at 2290 McDaniel Street, Suite 2A, North Las Vegas, Nevada 89030.

26 9. Respondent was engaged as a preceptee of Addo-Quaye at TruCare from
27 September 2018 to present.

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1 10. Addo-Quaye was out of the country from September 1, 2019, to
2 September 20, 2019.

3 **COUNT I**
4 **NRS 630.306(1)(b)(3)**
5 **(Violation of Statutes and Regulations of the Nevada State Board of Pharmacy)**

6 11. All of the allegations contained in Paragraphs 1-10 above are hereby incorporated
7 by reference as though fully set forth herein.

8 12. Respondent is a practitioner as defined by NRS 639.0125(1), as a physician, who
9 holds a license to practice medicine in the State of Nevada.

10 13. NRS 630.306(1)(b)(3) provides that engaging in conduct that violates a provision
11 of chapter 639 of NRS, or a regulation adopted by the State Board of Pharmacy pursuant thereto,
12 that is applicable to a licensee who is a practitioner, as defined in NRS 639.0125, is grounds for
13 initiating discipline against a licensee.

14 14. The Nevada State Board of Pharmacy adopted NAC 454.060, which sets forth
15 requirements for written prescriptions for dangerous drugs. NAC 454.060 incorporates and
16 includes the prescription requirements of NRS 454.223. In part, NRS 454.223(2)(a) provides:

- 17 2. A written prescription must contain:
18 (a) The name of the practitioner, the signature of the
19 practitioner if the prescription was not transmitted orally and
20 the address of the practitioner if not immediately available to
21 the pharmacist;

22 15. Respondent violated NAC 454.060 in that, as Addo-Quaye's preceptee, and while
23 Addo-Quaye was out of the country from September 1, 2019, to September 20, 2019, Respondent
24 prescribed dangerous drugs by using Addo-Quaye's blank prescription pads having Addo-Quaye's
25 name pre-printed on the prescription forms. Respondent failed to cross-out Addo-Quaye's name
26 on the prescription forms and write in his own name prior to Respondent signing his own name on
27 the prescription for dangerous drugs, in violation of NAC 454.060, a regulation of the State Board
28 of Pharmacy, because the above-referenced prescription did not contain Respondent's name
(although it did contain Respondent's signature), as required by NRS 454.223(2)(a) which is
incorporated by NAC 454.060, a regulation adopted by the State Board of Pharmacy.

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

WHEREFORE, the IC 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 Amended Complaint herein as set forth in NRS 630.339(2) within twenty (20) days of service of the Amended 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 finds and concludes that 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, to include sanctions to be imposed; and

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

DATED this 23 day of November, 2020.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 
Aaron Bart Fricke, Esq., Senior 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 23 day of November, 2020.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: M. Neil Duxbury
M. Neil Duxbury, Chairman

OFFICE OF THE GENERAL COUNSEL
Nevada State Board of Medical Examiners
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CERTIFICATE OF SERVICE

I hereby certify that I am employed by the Nevada State Board of Medical Examiners and that on the 23rd day of November, 2020, I served a file-stamped copy of the **FIRST AMENDED COMPLAINT**, via electronic mail to the following:

John A. Hunt Esq. at jhunt@clarkhill.com
c/o Victor Ronald Bruce, M.D.
3800 Howard Hughes Pkwy., Ste. 500
Las Vegas, NV 89169

DATED this 23rd day of November, 2020.


Mercedes Fuentes, Legal Assistant
Nevada State Board of Medical Examiners