

BEFORE THE BOARD OF MEDICAL EXAMINERS  
OF THE STATE OF NEVADA

\* \* \* \* \*


In the Matter of Charges and Complaint  
Against:  
ADELBERT SCOTT WADSWORTH, PA-C  
Respondent.

Case No. 21-41170-1

FILED

OCT 28 2021

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS

By: 

COMPLAINT

The Investigative Committee<sup>1</sup> (IC) of the Nevada State Board of Medical Examiners (Board), by and through Aaron Bart Fricke, J.D., General Counsel and attorney for the IC, having a reasonable basis to believe that ADELBERT SCOTT WADSWORTH, PA-C (Respondent) violated the provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical Practice Act), hereby issues its Complaint, stating the IC's charges and allegations as follows:

1. Respondent was at all times relative to this Complaint a physician assistant holding an active license to practice medicine in the State of Nevada (License No. PA1449). Respondent was originally licensed by the Board on August 13, 2013.

2. Pursuant to NRS 630.020(1), the "Practice of medicine" means:

1. To diagnose, treat, correct, prevent or **prescribe** for any human disease, ailment, injury, infirmity, deformity or other condition, physical or mental, by any means or instrumentality, including, but not limited to, the performance of an autopsy. [emphasis added].

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<sup>1</sup> 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 Mr. M. Neil Duxbury, Michael C. Edwards, M.D., FACS, and Aury Nagy, M.D.

1 3. Pursuant to NAC 630.375(2) a physician assistant shall not perform medical  
2 services without supervision from his or her supervising physician, except in life-threatening and  
3 emergency situations.

4 4. Pursuant to NAC 630.380(1)(c), performing medical services otherwise than in a  
5 life-threatening or emergency situation, and otherwise than with supervision from a supervising  
6 physician, is grounds for initiating disciplinary action against a physician assistant.

7 5. NAC 630.380(1)(m) provides that violating any provision of NRS 630.301 to  
8 630.3065, is grounds for initiating disciplinary action against a physician assistant.

9 6. NRS 630.3062 provides that failure to maintain timely, legible, accurate and  
10 complete medical records relating to the diagnosis, treatment and care of a patient is grounds for  
11 initiating disciplinary action or denying licensure.

12 **COUNT I**

13 **NAC 630.380(1)(c) – Performance of Medical Services Without a Supervising Physician**

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

16 8. Respondent performed medical services otherwise than in a life-threatening or  
17 emergency situation, and without the supervision of a supervising physician, when, on  
18 July 27, 2020, he wrote a prescription for Ambien 10 mg, QHS, 30 ct., with five (5) refills, for  
19 Patient A<sup>2</sup> to treat insomnia.

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

22 **COUNT II**

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

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

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<sup>2</sup> Patient A'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.

1 11. Respondent failed to maintain complete medical records relating to the diagnosis,  
2 treatment, and care of Patient A by failing to maintain any records whatsoever of his diagnosis,  
3 treatment, and care of Patient A.

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

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

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

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

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

14 4. That the Board award fees and costs for the investigation and prosecution of this  
15 case as outlined in NRS 622.400;

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

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

20 DATED this 25<sup>th</sup> day of October, 2021.

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

23 By:



24 AARON BART FRICKE, J.D.  
25 General Counsel  
26 9600 Gateway Drive  
27 Reno, NV 89521  
28 Tel: (775) 688-2559  
Email: [africke@medboard.nv.gov](mailto:africke@medboard.nv.gov)  
*Attorney for the Investigative Committee*

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VERIFICATION


STATE OF NEVADA        )  
                                  : ss.  
COUNTY OF WASHOE    )

Bret W. Frey, 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 28 day of October, 2021.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

  
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BRET W. FREY, M.D.  
*Chairman of the Investigative Committee*


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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 28th day of October, 2021, I served a file-stamped copy of the foregoing **COMPLAINT**, via U.S. Certified Mail to the following parties:

ADELBERT SCOTT WADSWORTH, PA-C  
7150 W. Sunset Road, #201A  
Las Vegas, NV 89113  
*Certified Mail Receipt No.*                      9171 9690 0935 0252 1577 57

DATED this 28<sup>th</sup> day of October, 2021.

  
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MERCEDES FUENTES  
Legal Assistant  
Nevada State Board of Medical Examiners