



**COUNT I**

**NRS 630.3062(1)(h) – Unauthorized and Otherwise Inappropriate Prescribing  
of a Schedule II Controlled Substance**

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

5. Respondent, a urologist, prescribed Adderall, a schedule II controlled substance, in an unauthorized and otherwise inappropriate manner when he issued at least twenty-one (21) prescriptions to Patient A for Dextroamp-Amphetamin, 30 mg tablets, from July 2018 through June 2020 (e.g., on July 16, 2018, August 15, 2018, September 13, 2018, October 11, 2018, November 9, 2018, December 10, 2018, January 11, 2019, February 8, 2019, March 11, 2019, April 29, 2019, May 29, 2019, June 28, 2019, July 29, 2019, August 26, 2019, September 27, 2019, October 24, 2019, December 2, 2019, January 31, 2020, March 9, 2020, April 20, 2020, and June 15, 2020) without documenting any patient visits, encounters, examinations, tests or diagnoses of Patient A. Respondent further failed to provide justification for the medication, failed to monitor the effectiveness of the medication, failed to monitor Patient A for elevated blood pressure, among other conditions, and prescribed such medication without first and periodically checking the Nevada Prescription Monitoring Program for signs of duplicate prescriptions, abuse or diversion, among other failures to satisfy requirements established by Nevada statutes and regulations.

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

**COUNT II**

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

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

8. Respondent failed to maintain complete medical records relating to the diagnosis, treatment and care of Patient A by failing to maintain any records of his diagnosis, treatment and care of Patient A.

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9. 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 award fees and costs for the investigation and prosecution of this case as outlined in NRS 622.400;

5. 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

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

DATED this 2 day of November, 2021.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:   
AARON BART FRICKE, J.D.  
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*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 1 day of November, 2021.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: \_\_\_\_\_



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

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I am employed by the Nevada State Board of Medical Examiners and  
3 that on the 2nd day of November, 2021, I served a file-stamped copy of the foregoing  
4 **COMPLAINT** via U.S. Certified Mail, to the following parties:

5 DAVID VICTOR LUDLOW, M.D.  
6 P.O. Box 35380  
7 Las Vegas, NV 89133  
8 *Tracking No.:*

9 9171 9690 0935 0252 1578 56

10 Courtesy copy by electronic mail to:

11 KEITH A. WEAVER, ESQ.  
12 [Keith.Weaver@lewisbrisbois.com](mailto:Keith.Weaver@lewisbrisbois.com)

13 DATED this 2nd day of November, 2021.

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15 \_\_\_\_\_  
16 MERCEDES FUENTES  
17 Legal Assistant  
18 Nevada State Board of Medical Examiners  
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