

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

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

Case No. 21-46679-1

6   **Against:**

7   **KEENAN ROBERT RICHARDS, M.D.,**

8   **Respondent.**

FILED

AUG - 5 2021

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS

By: 

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10                                   **COMPLAINT**

11           The Investigative Committee<sup>1</sup> (IC) of the Nevada State Board of Medical Examiners  
12 (Board), by and through Donald K. White, J.D., Deputy General Counsel and attorney for the IC,  
13 having a reasonable basis to believe that Keenan Robert Richard, 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 active license to practice medicine in the State of Nevada (License No. 17219). Currently,  
19 Respondent holds an expired medical license. Respondent was originally licensed by the Board on  
20 July 1, 2017.

21           2.     On April 3, 2018 the IC issued an Order for Substance Abuse Evaluation to  
22 Respondent. The Order was personally served on Respondent on April 4, 2018.

23           3.     The order required Respondent to appear at Montevista Hospital at 6000  
24 W. Rochelle Avenue, Las Vegas, Nevada 89103. Respondent failed to report to Montevista  
25 Hospital.

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28           <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 Rachakonda D. Prabhu, M.D., Ms. Sandy  
Peltyn and Victor M. Muro, M.D.

COUNT I

**NRS 630.3065(2)(a) - Failing to Comply with a Lawful Order of the  
Investigative Committee**

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

6 2. NRS 630.3065(2)(a) provides that knowingly or willfully failing to comply with  
7 an order of a committee designated by the Board to investigate a complaint against a physician,  
8 i.e., the IC, is grounds for initiating disciplinary action.

9 3. Respondent failed to comply with the IC's Order dated April 3, 2018 by not  
10 reporting to Montevista Hospital as Ordered.

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

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

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

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

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

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

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

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

DATED this 4<sup>th</sup> day of August, 2021.

INVESTIGATIVE COMMITTEE OF THE  
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:



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