





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

3 **COUNT III**

4 **NRS 630.301(11)(g) - Conviction of an Offense Involving Moral Turpitude**

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

7 14. NRS 630.301(11)(g) provides that conviction of any offense involving moral  
8 turpitude is grounds for initiating disciplinary action or denying licensure.

9 15. Respondent was sentenced to and convicted of violating the Criminal Code of  
10 Virginia § 18.2-374.1:1 – Possession, reproduction, distribution, solicitation, and facilitation of  
11 child pornography.

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

14 **COUNT IV**

15 **NRS 630.301(3) - Disciplinary Action by Another Licensing Board**

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

18 18. NRS 630.301(3) provides that any disciplinary action, including, without  
19 limitation, the revocation, suspension, modification, or limitation of a license to practice any type  
20 of medicine, taken by another state ... or the surrender of the license or discontinuing the practice  
21 of medicine while under investigation by any licensing authority is grounds for initiating  
22 disciplinary action or denying licensure.

23 19. Respondent was disciplined by the Virginia Department of Health Professionals  
24 (VDHP) of the Commonwealth of Virginia when the VDHP issued an Order of Mandatory  
25 Suspension dated March 15, 2022.

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

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

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

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

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

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

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

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

15 DATED this 26<sup>th</sup> day of October, 2022.

16 INVESTIGATIVE COMMITTEE OF THE  
17 NEVADA STATE BOARD OF MEDICAL EXAMINERS

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

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