BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

* * * *

In the Matter of Charges and Complaint

Against:

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MATTHEW OBIM OKEKE, M.D.,

Respondent.

Case No. 22-22461-1

FILED

SEP 1 3 2022

NEVADA STATE BOARD OF MEDICAL EXAMINERS

COMPLAINT

The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners (Board), by and through Sarah A. Bradley, J.D., Deputy General Counsel and attorney for the IC, having a reasonable basis to believe that Matthew Obim Okeke, M.D., (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:

- Respondent was at all times relative to this Complaint a medical doctor holding an 1. active-probation license to practice medicine the State of Nevada (License No. 14957). Respondent was originally licensed by the Board on October 8, 2003.²
- On or about November 18, 2020, Respondent was arrested for driving under the 2. influence (DUI).
- Respondent was booked into the Las Vegas Metropolitan Police Department 3. Detention Center in connection with this arrest.
- On June 23, 2021, Respondent reported the arrest for DUI to the Board in his 2021 4. license renewal.

¹ 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 Bret W. Frey, M.D., and Col. Eric D. Wade, USAF (Ret.) (Public Member).

² Respondent's original license number issued on October 8, 2003, was 10668. Respondent was issued license number 14957 on September 6, 2013.

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5. Respondent failed to report this arrest to the Board within thirty (30) days as required by NRS 630.306(1)(1).

COUNT I

NRS 630.306(1)(1) - Failure to Report Criminal Action

- 8. All of the allegations contained in the above paragraphs are hereby incorporated by reference as though fully set forth herein.
- NRS 630.306(1)(1) provides that the failure by a licensee to report in writing, 9. within thirty (30) days, any criminal action taken, or conviction obtained is grounds for initiating disciplinary action.
- 10. Respondent did not report to the Board in writing within thirty (30) days his arrest for DUI on November 18, 2020.
- 11. By reason of the foregoing, Respondent is subject to discipline by the Nevada Board 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;
- That the Board award fees and costs for the investigation and prosecution of this 4. case as outlined in NRS 622.400;
- That the Board make, issue and serve on Respondent its findings of fact, 5. conclusions of law and order, in writing, that includes the sanctions imposed; and

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OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners

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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 13th day of September, 2022.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

SARAH A. BRADLEY, J.D., MBA

Deputy Executive Director 9600 Gateway Drive

Reno, NV 89521

Tel: (775) 688-2559

Email: <u>bradleys@medboard.nv.gov</u>
Attorney for the Investigative Committee

OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners

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 13th day of September, 2022.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

Chairman of the Investigative Committee

CERTIFICATE OF SERVICE I hereby certify that I am employed by the Nevada State Board of Medical Examiners and that on the 13th day of September, 2022, I served a file-stamped copy of the foregoing **COMPLAINT**, via USPS Certified Mail to the following parties: Matthew Obim Okeke, M.D. c/o Liborius Agwara, Esq. 2785 E. Desert Inn Rd., Ste. 280 Las Vegas, NV 89121 Tracking No.: 9171 9690 0935 0254 7616 31 With courtesy copy by email to: Liborius Agwara, Esq., at libolaw@yahoo.com DATED this 13th day of September, 2022. MERCEDES FUENTE Legal Assistant Nevada State Board of Medical Examiners