

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

3 * * * * *

4
5 **In the Matter of Charges and Complaint**

Case No. 23-12019-1

6 **Against:**

7 **RAVI GP KRISHNAN, M.D.,**

8 **Respondent.**

FILED

MAY - 9 2023

**NEVADA STATE BOARD OF
MEDICAL EXAMINERS**

By: 

9
10 **COMPLAINT**

11 The Investigative Committee¹ (IC) of the Nevada State Board of Medical Examiners
12 (Board), by and through William P. Shogren, Deputy General Counsel and attorney for the IC,
13 having a reasonable basis to believe that Ravi Gp Krishnan, 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. 8406). Respondent was
19 originally licensed by the Board on September 22, 1997.

20 2. Respondent also, at all times relevant to this Complaint, held an active Nevada
21 Controlled Substance Registration, Certificate No. CS09114, issued by the Nevada State Board of
22 Pharmacy (Pharmacy Board).

23 3. On or about March 30, 2021, Respondent was served with the Notice of Intended
24 Action and Accusation (Accusation), alleging that Respondent was the medical director of Bright
25 Futures Pediatrics (Bright Futures), and that in such capacity he violated various statutes and
26 regulations within the Pharmacy Board's jurisdiction.

27
28 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 Carl N. Williams, Jr.,
M.D., FACS.

1 10. Respondent is a practitioner as defined by NRS 639.0125(1), as a physician who
2 holds a license to practice medicine in the State of Nevada.

3 11. NRS 630.306(1)(b)(3) provides that engaging in conduct that violates a provision
4 of Chapter 639 of NRS, or a regulation adopted by the Pharmacy Board pursuant thereto, that is
5 applicable to a licensee who is a practitioner, as defined in NRS 639.0125, is grounds for initiating
6 discipline against a licensee.

7 12. Respondent admitted that evidence against him existed and would prove violations
8 of NRS Chapter 639 when he entered into the Pharmacy Board Stipulation. Respondent further
9 accepted the Pharmacy Board Stipulation “as a public reprimand regarding his duties and
10 responsibilities as a prescribing practitioner.” See **Exhibit 1**. Respondent thereby engaged in
11 conduct that violated a provision of Chapter 639 of NRS, or a regulation adopted by the Pharmacy
12 Board pursuant thereto.

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

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

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

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

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

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

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

27 ///


28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

DATED this 9th day of May, 2023.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

By: 
WILLIAM P. SHOGREN
Deputy General Counsel
9600 Gateway Drive
Reno, NV 89521
Tel: (775) 688-2559
Email: shogrenw@medboard.nv.gov
Attorney for the Investigative Committee

VERIFICATION

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

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 9th day of May, 2023.

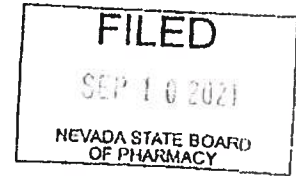
INVESTIGATIVE COMMITTEE OF THE
 NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

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

EXHIBIT 1

EXHIBIT 1



BEFORE THE NEVADA STATE BOARD OF PHARMACY

NEVADA STATE BOARD OF PHARMACY,

Case No. 17-090-CS-S

Petitioner,

v.

STIPULATION AND ORDER

RAVI G. KRISHNAN, MD,
Certificate of Registration No. CS09114,

Respondent.

Brett Kandt, General Counsel for Petitioner the Nevada State Board of Pharmacy (Board), and Respondent Ravi G. Krishnan, MD, Certificate of Registration No. CS09114, by and through counsel, Lyn E. Beggs, Esq., **HEREBY STIPULATE AND AGREE THAT:**

1. The Board has jurisdiction over Respondent and this matter.
2. On or about March 30, 2021, Respondent was served with the Notice of Intended Action and Accusation (Accusation) on file in this matter together with the Statement to Respondent and Notice of Hearing.
3. On or about May 3, 2021, Respondent filed an Answer and Notice of Defense to the Accusation.
4. Respondent is fully aware of the right to seek the advice of counsel in this matter and obtained the advice of counsel prior to entering into this Stipulation.
5. Respondent is aware of his right to a hearing on the matters alleged in the Accusation, his right to reconsideration, his right to appeal and any and all other rights which may be accorded to him pursuant to NRS Chapter 233B (Nevada Administrative Procedure Act), NRS Chapter 622A (Administrative Procedure Before Certain Regulatory Bodies), and NRS Chapter 639 (Nevada Pharmacy Act).
6. Conditioned on the acceptance of this Stipulation by the Board, and with the exception of the right to challenge any determination that Respondent has failed to comply with

the provisions of this Stipulation, Respondent hereby freely and voluntarily waives his rights to a hearing, reconsideration, appeal and any and all other rights related to this action that may be accorded to him by NRS Chapter 233B (Nevada Administrative Procedure Act), NRS Chapter 622A (Administrative Procedure Before Certain Regulatory Bodies), and NRS Chapter 639 (Nevada Pharmacy Act).

7. Respondent admits that evidence exists, and that Board staff prosecuting this case could present such evidence at an administrative hearing to establish a factual basis for the violations alleged in the Accusation, *to wit*, that, on or before December 2017, Respondent:

A. Admitted having authorized and permitted the practice manager at Bright Futures Pediatrics, who was not a licensed practitioner, to purchase, access, store, and/or possess dangerous drugs, and permitted unrestricted and unsecured access to his stock of dangerous drugs at Bright Futures, in violation of NRS 454.213(1), NRS 454.311(1); NRS 454.316(1), NRS 454.356, NRS 639.100(1), NRS 639.281(1) NAC 639.742 and/or NAC.639.745;

B. Admitted having authorized and permitted the practice manager at Bright Futures Pediatrics to furnish and/or dispense dangerous drugs to persons who had not been examined by a practitioner, with whom Respondent did not have a *bona fide* therapeutic relationship and for whom Respondent had neither diagnosed or determined that a dangerous drug was medically necessary, and before he wrote a patient-specific order and without his direct supervision, in violation of NRS 454.215, NRS 454.221(1), NRS 454.301(1), NRS 454.321, NRS 454.356, NRS 639.100(1), NRS 639.281(1), NRS 639.23505, NAC 639.742 and/or NAC.639.745;

C. Admitted having authorized and permitted the practice manager at Bright Futures Pediatrics to dispense dangerous drugs to persons through his practice at Bright Futures without a valid dispensing practitioner registration, in violation of NRS 454.215, NRS

454.221(1), NRS 454.301(1), NRS 454.321, NRS 454.356, NRS 639.100(1), NRS 639.281(1), NRS 639.23505, NAC 639.742 and/or NAC.639.745;

D. Performed his duties as the holder of a registration issued by the Board in an incompetent, unskillful or negligent manner and engaged in unprofessional conduct and conduct contrary to the public interest in violation of NAC 639.945(1)(h), (i), (j), (k) and (o) and is subject to discipline pursuant to NRS 453.236(1), NRS 639.210(4) and NRS 639.23916(3)(b); and

E. Committed acts that render his registration inconsistent with the public interest pursuant to NRS 453.231.

8. Those violations are plead with particularity in the Accusation, and are grounds for action pursuant to NRS 453.236(1), NRS 453.241(1), NRS 639.210 and NRS 639.255.

9. In order to resolve this matter without incurring any further costs or the expense associated with a hearing, the Board and Respondent Ravi G. Krishnan, MD, Certificate of Registration No. CS09114, stipulate to the following penalties:

A. Respondent shall accept this Stipulation and Order as a public reprimand regarding his duties and responsibilities as a practitioner under NRS Chapter 453, Chapter 454, and Chapter 639;

B. Respondent shall pay a fine of Two Thousand Five Hundred Dollars (\$2500.00) for the violations, payable by *cashier's check* or *certified check* or *money order* made payable to "State of Nevada, Office of the Treasurer," to be received by the Board's Reno office located at 985 Damonte Ranch Parkway – Suite 206, Reno, Nevada 89521, within thirty (30) days of the effective date of this Order;

C. Respondent shall pay One Thousand Dollars (\$1000.00) to partially reimburse the Board for recoverable attorney's fees and costs incurred in investigating and prosecuting this matter, payable by *cashier's check* or *certified check* or *money order* made

payable to "Nevada State Board of Pharmacy," to be received by the Board's Reno office located at 985 Damonte Ranch Parkway -- Suite 206, Reno, Nevada 89521, within thirty (30) days of the effective date of this Order;

D. Respondent shall establish and put into practice all necessary policies and procedures within his practice to ensure that:

i. A bona fide relationship between the patient and the practitioner ordering a dangerous drug exists before any dangerous drug is ordered or administered;

ii. The practitioner who examines the patient and orders the dangerous drug maintains exclusive possession and control of the medication until after he or she creates a patient-specific and medication-specific order for the administration of the medication;

iii. To the extent the medication called for in an order are put into the control and possession of anyone other than a practitioner, the ordering practitioner personally gives control and possession of the medication to the non-practitioner and only gives the non-practitioner the specific medication in the specific quantity needed to fill the order; and

iv. All dangerous drugs are kept in a locked storage area with access restricted to authorized persons;

E. Respondent shall not dispense dangerous drugs without first obtaining a dispensing practitioner registration from the Board; and

F. Respondent shall comply with all federal and state statutes and regulations regarding controlled substances and dangerous drugs.

10. Any failure by Respondent to comply with the terms of this Order may result in issuance by the Executive Secretary of an order to show cause pursuant to NAC 639.965 directing that Respondent to appear before the Board at the next regularly scheduled meeting for a show cause hearing. If such a hearing results in a finding of a violation of this Order by

Respondent, the Board may impose additional discipline upon Respondent consistent with the provisions of NRS Chapter 453 and/or Chapter 639.

11. General Counsel will present this Stipulation to the Board for approval pursuant to NRS 622.330 at the Board's regularly scheduled public meeting on September 1, 2021.

Respondent may appear at the meeting to answer questions from the Board Members and/or Board Staff. The Board Members and Staff may discuss and deliberate regarding this Stipulation, even if Respondent is not present at the meeting.

12. The Board has discretion to accept this Stipulation, but it is not obligated to do so. If this Stipulation is approved by the Board, it shall be a public record pursuant to NRS 622.330.

13. If the Board rejects any part or all of this Stipulation, and unless they reach an alternative agreement on the record during the hearing, the parties agree that a full hearing on the merits of this matter may be heard by the Board. The terms and admissions herein may not be used or referred to in a full hearing on the merits of this matter.

14. Subject to the approval of this Stipulation by the Board, the Board and Respondent agree to release each other from any and all additional claims arising from the facts set forth in the Accusation on file herein, whether known or unknown that might otherwise have existed on or before the effective date of this Order.

Respondent has fully considered the charges and allegations contained in the Notice of Intended Action and Acceptance in this matter, and the terms of this Stipulation, and has freely and voluntarily agreed to the terms set forth herein, and waived certain rights, as stated herein.

AGREED:

Signed this 29 day of August, 2021.

Signed this 29 day of August, 2021.


RAVI G. KRISHNAN, MD,
Certificate of Registration No. CS09114


BRETT KANE, ESQ.,
General Counsel
Nevada State Board of Pharmacy

APPROVED AS TO FORM AND CONTENT
this 29 day of August, 2021.


LYNNE BEESON, ESQ.,
Counsel for Respondent

DECISION AND ORDER

The Nevada State Board of Pharmacy hereby adopts the foregoing Stipulation as its decision in Ravi G. Krishnan, MD, Certificate of Registration No. CS09114, in Case No. 17-00000000 and hereby orders that the terms of the foregoing Stipulation be made effective upon execution below.

IT IS SO ORDERED

Entered this 1 day of September, 2021.


Helen Park, Pharm.D.,
President
Nevada State Board of Pharmacy

Respondent has fully considered the charges and allegations contained in the *Notice of Intended Action and Accusation* in this matter, and the terms of this Stipulation, and has freely and voluntarily agreed to the terms set forth herein, and waived certain rights, as stated herein.

AGREED:

Signed this ___ day of August, 2021

Signed this ___ day of August, 2021

RAVI G. KRISHNAN, MD,
Certificate of Registration No. CS09114

BRETT KANDT, ESQ.
General Counsel
Nevada State Board of Pharmacy

APPROVED AS TO FORM AND CONTENT
this ___ day of August, 2021


LYN E. BEGGS, ESQ.
Counsel for Respondent

DECISION AND ORDER

The Nevada State Board of Pharmacy hereby adopts the foregoing Stipulation as its decision as to Ravi G. Krishnan, MD, Certificate of Registration No. CS09114, in Case No. 17-090-CS-S and hereby orders that the terms of the foregoing Stipulation be made effective upon execution below.

IT IS SO ORDERED.

Entered this 17th day of September, 2021.



Helen Park, Pharm.D.
President
Nevada State Board of Pharmacy

CERTIFICATE OF SERVICE

I certify that I am an employee of the Nevada State Board of Pharmacy, and that on this 15th day of September, 2021, I served a true and correct copy of the foregoing document by Certified U.S. Mail to the following:

Ravi G. Kirshnan, MD
8352 W Warm Springs Rd #210
Las Vegas, Nv 89113

Lyn Beggs, Esq.
316 California Ave. #863
Reno, NV 89509


SHIRLEY HUNTING