

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. 24-22461-1

6 **Against:**

FILED

7 **MATTHEW OBIM OKEKE, M.D.,**

FEB 21 2024

8 **Respondent.**

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 Sarah A. Bradley, J.D., Deputy Executive Director and attorney for the
13 IC, having a reasonable basis to believe that Matthew Obim Okeke, M.D., (Respondent) violated
14 the provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code
15 (NAC) Chapter 630 (collectively, the Medical Practice Act), hereby issues its Complaint, stating
16 the IC's 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 the State of Nevada (License No. 14957). Respondent was
19 originally licensed by the Board on October 8, 2003.²

20 2. Respondent was not present in the United States from February 26, 2017, through
21 March 11, 2017, September 27, 2017, through October 2, 2017, June 30, 2018, through
22 July 7, 2018, and November 9, 2018, through November 23, 2018.

23 3. Patient A³ was a seventy-seven (77) year-old male at the time of the events at issue
24 in this Complaint.

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26 ¹ The Investigative Committee of the Nevada State Board of Medical Examiners, at the time this formal
27 Complaint was authorized for filing, was composed of Board members Bret W. Frey, M.D., Chowdhury H. Ahsan
M.D., Ph.D., FACC., and Col. Eric D. Wade, USAF (Ret.) (Public Member).

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

³ Patient A's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

1 4. Respondent billed for “crisis intervention services” under his National Provider
2 Identifier (NPI) and Medicaid Provider ID for appointments for Patient A on November 12, 2018,
3 November 13, 2018, November 14, 2018, November 19, 2018, November 20, 2018, and
4 November 21, 2018.

5 5. Respondent was out of the country (United States) for those dates of service.

6 6. Patient B⁴ was a forty-four (44) year-old female at the time of the events at issue in
7 this Complaint.

8 7. Respondent billed for “crisis intervention services” under his NPI and Medicaid
9 Provider ID for appointments for Patient B on November 16, 2018, November 17, 2018,
10 November 18, 2018, November 19, 2018, November 20, 2018, and November 21, 2018.

11 8. Respondent was out of the country (United States) for those dates of service.

12 9. Patient C⁵ was a fifty-four (54) year-old female at the time of the events at issue in
13 this Complaint.

14 10. Respondent signed-off on a progress note for Patient C on November 20, 2018,
15 with billing codes for 99214, with a 90833 add-on.

16 11. Respondent also wrote a prescription for Patient C for Adderall (amphetamine
17 salts), a Schedule II controlled substance on November 20, 2018.

18 12. The prescription for Patient C was a paper prescription dated November 20, 2018,
19 that contained a signature from Respondent.

20 13. Respondent was out of the country (United States) on November 20, 2018.

21 14. During the time at issue in this Complaint, Respondent did not query the
22 Prescription Monitoring Program (PMP) for Patient C’s Patient Report as required by Nevada law.

23 15. Patient D⁶ was a twenty-eight (28) year-old male at the time of the events at issue
24 in this Complaint.

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27 ⁴ Patient B’s true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

28 ⁵ Patient C’s true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

⁶ Patient D’s true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

1 16. Billing records for Patient D show Respondent as the “rendering provider” for
2 services with a billing code of 99214, with a 90833 add-on on November 20, 2018.

3 17. However, Patient D’s medical records show that Patient D was actually seen by
4 TDP, APRN, on November 20, 2018.

5 18. Respondent also billed for “crisis intervention services” under his NPI and
6 Medicaid Provider ID for appointments for Patient D on November 20, 2018, and
7 November 21, 2018.

8 19. Respondent was out of the country (United States) for those dates of service.

9 20. Patient E⁷ was an eleven (11) year-old male at the time of the events at issue in this
10 Complaint.

11 21. Billing records for Patient E show Respondent as the “rendering provider” for
12 services with a billing code of 99214 with a 90833 add-on, on November 21, 2018.

13 22. However, Patient E’s medical records show that Patient E was actually seen by
14 TDP, APRN on November 21, 2018.

15 23. Respondent also wrote a prescription for Patient E for Vyvanse
16 (lisdexamfetamine), a Schedule II controlled substance on November 21, 2018.

17 24. The prescription for Patient E was a paper prescription for a Schedule II controlled
18 substance and contains the signature of Respondent.

19 25. Respondent was out of the country (United States) on November 21, 2018.

20 26. During the time at issue in this Complaint, Respondent did not query the PMP for
21 Patient E’s Patient Report as required by Nevada law.

22 27. Patient F⁸ was a forty-two (42) year-old female at the time of the events at issue in
23 this Complaint.

24 28. Billing records for Patient F show that Respondent billed for a 90837 appointment
25 under his NPI number on February 28, 2017.

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28 ⁷ Patient E’s true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

⁸ Patient F’s true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

1 29. However, Patient F's medical records show that Patient F was actually seen by SM,
2 MST for therapy on February 28, 2017.

3 30. Billing records for Patient F show that Respondent billed for a 99214 appointment,
4 with a 90833 add-on on September 27, 2017, under his NPI number.

5 31. However, Patient F's medical records show that Patient F was actually seen by NK,
6 APRN on September 27, 2017.

7 32. Respondent was out of the country (United States) on both of those dates,
8 February 28, 2017, and September 27, 2017.

9 33. Patient G⁹ was a fifty-five (55) year-old female at the time of the events at issue in
10 this Complaint.

11 34. Billing records for Patient G show that Respondent billed for a 99214 appointment,
12 with a 90833 add-on on November 14, 2018, under his NPI number.

13 35. However, Patient G's medical records show that Patient G was actually seen by
14 TDP, APRN on November 14, 2018.

15 36. Respondent also wrote two (2) prescriptions for Patient G, one (1) for Adderall
16 (amphetamine salts) a Schedule II controlled substance and one (1) for Klonopin (clonazepam) a
17 Schedule IV controlled substance, on November 14, 2018.

18 37. Both prescriptions for Patient G were on a single paper prescription dated
19 November 14, 2018, which contained a signature from Respondent.

20 38. Respondent was out of the country (United States) on November 14, 2018.

21 39. During the time at issue in this Complaint, Respondent did not query the PMP for
22 Patient G's Patient Report as required by Nevada law.

23 40. Patient H¹⁰ was a fifty-five (55) year-old female at the time of the events at issue in
24 this Complaint.

25 41. Respondent billed for "crisis intervention services" under his NPI and Medicaid
26 Provider ID for appointments for Patient H on November 9, 2018, November 10, 2018,
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28 ⁹ Patient G's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

¹⁰ Patient H's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

1 November 16, 2018, November 17, 2018, November 18, 2018, November 19, 2018, and
2 November 20, 2018.

3 42. Respondent was out of the country (United States) for those dates of service.

4 43. Patient I¹¹ was a thirty (30) year-old male at the time of the events at issue in this
5 Complaint.

6 44. Respondent wrote a prescription for Adderall (amphetamine salts), a Schedule II
7 controlled substance, on March 2, 2017.

8 45. The prescription for Patient I was a paper prescription dated March 2, 2017, that
9 contained a signature from Respondent.

10 46. Respondent was out of the country (United States) on March 2, 2017.

11 47. During the time at issue in this Complaint, Respondent did not query the PMP for
12 Patient I's Patient Report as required by Nevada law.

13 48. Patient J¹² was a fifty-two (52) year-old male at the time of the events at issue in
14 this Complaint.

15 49. Progress notes in Patient J's medical records show that he was seen by TDP, APRN
16 on November 15, 2018.

17 50. Respondent wrote two (2) prescriptions for Patient J for a Schedule II drug,
18 Adderall (amphetamine salts) and a Schedule IV drug, Xanax (alprazolam), on
19 November 15, 2018.

20 51. Both prescriptions for Patient J were on a single paper prescription dated
21 November 15, 2018, and contained a signature from Respondent.

22 52. Respondent was out of the country (United States) on November 15, 2018.

23 53. During the time at issue in this Complaint, Respondent did not query the PMP for
24 Patient J's Patient Report as required by Nevada law.

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28 ¹¹ Patient I's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

¹² Patient J's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

1 54. Patient K¹³ was a forty-two (42) year-old male at the time of the events at issue in
2 this Complaint.

3 55. Progress notes in Patient K's medical records show that he was seen by TDP,
4 APRN on November 15, 2018.

5 56. Respondent wrote two (2) prescriptions for Patient K for the controlled substances
6 Adderall (amphetamine salts), a Schedule II controlled substance, and Suboxone (buprenorphine),
7 a Schedule III controlled substance, on November 15, 2018.

8 57. These prescriptions for Patient K were paper prescriptions dated November 15,
9 2018, and each contained a signature from Respondent.

10 58. Respondent was out of the country (United States) on November 15, 2018.

11 59. During the time at issue in this Complaint, Respondent did not query the PMP for
12 Patient K's Patient Report as required by Nevada law.

13 60. Patient L¹⁴ was a sixty-two (62) year-old female at the time of the events at issue in
14 this Complaint.

15 61. Respondent wrote a prescription for Adderall (amphetamine salts), a Schedule II
16 controlled substance, for Patient L on February 28, 2017.

17 62. This prescription for Patient L was a paper prescription dated February 28, 2017,
18 and contained a signature from Respondent.

19 63. The medical records for Patient L provided by Respondent do not show that
20 Patient L had an appointment with Respondent nor anyone else at his clinic on February 28, 2017.

21 64. Patient L's medical records further show that Respondent's previous appointment
22 with Patient L was January 30, 2017.

23 65. Respondent was out of the country (United States) on February 28, 2017, (the date
24 of the prescription Patient L received for the controlled substance).

25 66. During the time at issue in this Complaint, Respondent did not query the PMP for
26 Patient L's Patient Report as required by Nevada law.

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28 ¹³ Patient K's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

¹⁴ Patient L's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

1 67. Patient M¹⁵ was a forty-four (44) year-old female at the time of the events at issue
2 in this Complaint.

3 68. Respondent wrote a prescription for Patient M for Adderall (amphetamine salts), a
4 Schedule II controlled substance, on March 6, 2017.

5 69. This prescription for Patient M was a paper prescription dated March 6, 2017, and
6 contained a signature from Respondent.

7 70. Respondent was out of the country on March 6, 2017.

8 71. During the time at issue in this Complaint, Respondent did not query the PMP for
9 Patient M's Patient Report as required by Nevada law.

10 72. Patient N¹⁶ was a thirty-five (35) year-old female at the time of the events at issue
11 in this Complaint.

12 73. Respondent provided Patient N with a prescription for two (2) controlled
13 substances, Xanax (alprazolam) a Schedule IV drug and Suboxone (buprenorphine), a Schedule
14 III drug, on November 15, 2018.

15 74. The prescriptions for Patient N were on a single paper prescription dated
16 November 15, 2018, and it contained a signature from Respondent.

17 75. Respondent was out of the country (United States) on November 15, 2018.

18 76. During the time at issue in this Complaint, Respondent did not query the PMP for
19 Patient N's Patient Report as required by Nevada law.

20 77. Patient O¹⁷ was a forty-eight (48) year-old female at the time of the events at issue
21 in this Complaint.

22 78. Respondent provided Patient O with a prescription for a Schedule III controlled
23 substance, Suboxone (buprenorphine), on November 13, 2018.

24 79. The prescription for Patient O was a paper prescription dated November 13, 2018,
25 that contained a signature from Respondent.

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27 ¹⁵ Patient M's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

28 ¹⁶ Patient N's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

¹⁷ Patient O's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

1 80. Respondent was out of the country (United States) on November 13, 2018.

2 81. During the time at issue in this Complaint, Respondent did not query the PMP for
3 Patient O's Patient Report as required by Nevada law.

4 82. Patient P¹⁸ was a thirty-six (36) year-old female at the time of the events at issue in
5 this Complaint.

6 83. Respondent provided Patient P with a prescription for Suboxone (buprenorphine), a
7 Schedule III controlled substance on November 20, 2018.

8 84. The prescription for Patient P was a paper prescription dated November 20, 2018,
9 that contained a signature from Respondent.

10 85. Respondent was out of the country (United States) on November 20, 2018.

11 86. During the time at issue in this Complaint, Respondent did not query the PMP for
12 Patient P's Patient Report as required by Nevada law.

13 87. Patient Q¹⁹ was a thirty-two (32) year-old female at the time of the events at issue
14 in this Complaint.

15 88. Respondent provided Patient Q with a prescription for Suboxone (buprenorphine),
16 a Schedule III controlled substance, on November 16, 2018.

17 89. The prescription for Patient Q was a paper prescription dated November 16, 2018,
18 that contained a signature from Respondent.

19 90. Respondent was out of the country (United States) on November 16, 2018.

20 91. During the time at issue in this Complaint, Respondent did not query the PMP for
21 Patient Q's Patient Report as required by Nevada law.

22 92. Patient R²⁰ was a forty-nine (49) year-old female at the time of the events at issue
23 in this Complaint.

24 93. Respondent provided Patient R with a prescription for Suboxone (buprenorphine),
25 a Schedule III controlled substance, on November 13, 2018.

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27 ¹⁸ Patient P's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
28 Designation served upon Respondent along with a copy of this Complaint.

¹⁹ Patient Q's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

²⁰ Patient R's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

1 94. The prescription for Patient R is a paper prescription dated November 13, 2018,
2 that contained a signature from Respondent.

3 95. Respondent was out of the country (United States) on November 13, 2018.
4 During the time at issue in this Complaint, Respondent did not query the PMP for Patient R's
5 Patient Report as required by Nevada law.

6 96. Patient S²¹ was a thirty-seven (37) year-old male at the time of the events at issue
7 in this Complaint.

8 97. Respondent provided Patient S with a prescription for Suboxone (buprenorphine), a
9 Schedule III controlled substance, on November 16, 2018.

10 98. The prescription for Patient S was a paper prescription dated November 16, 2018,
11 that contained a signature from Respondent.

12 99. Respondent was out of the country (United States) on November 16, 2018.

13 100. During the time at issue in this Complaint, Respondent did not query the PMP for
14 Patient S's Patient Report as required by Nevada law.

15 101. Patient T²² was a thirty-one (31) year-old female at the time of the events at issue
16 in this Complaint.

17 102. Respondent provided Patient T with a prescription for Suboxone (buprenorphine), a
18 Schedule III controlled substance on November 13, 2018.

19 103. The prescription for Patient T was a paper prescription dated November 13, 2018,
20 that contained a signature from Respondent.

21 104. Respondent was out of the country (United States) on November 13, 2018.

22 105. During the time at issue in this Complaint, Respondent did not query the PMP for
23 Patient T's Patient Report as required by Nevada law.

24 106. Patient U²³ was a thirty-six (36) year-old male at the time of the events at issue in
25 this Complaint.

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27 ²¹ Patient S's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

28 ²² Patient T's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

²³ Patient U's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

1 107. Respondent provided Patient U with a prescription for Suboxone (buprenorphine),
2 a Schedule II controlled substance on November 13, 2018.

3 108. The prescription for Patient U was a paper prescription dated November 13, 2018,
4 that contained a signature from Respondent.

5 109. Respondent was out of the country (United States) on November 13, 2018.

6 110. During the time at issue in this Complaint, Respondent did not query the PMP for
7 Patient U's Patient Report as required by Nevada law.

8 111. Patient V²⁴ was a forty-nine (49) year-old female at the time of the events at issue
9 in this Complaint.

10 112. Respondent provided Patient V with a prescription for buprenorphine, a Schedule
11 III controlled substance, on November 20, 2018.

12 113. The prescription for Patient V was a paper prescription dated November 20, 2018,
13 that contained a signature from Respondent.

14 114. Respondent was out of the country (United States) on November 20, 2018.

15 115. During the time at issue in this Complaint, Respondent did not query the PMP for
16 Patient V's Patient Report as required by Nevada law.

17 116. Patient W²⁵ was a forty-one (41) year-old male at the time of the events at issue in
18 this Complaint.

19 117. Respondent provided Patient W with a prescription for Suboxone (buprenorphine),
20 a Schedule III controlled substance, on November 13, 2018.

21 118. The prescription for Patient W was a paper prescription dated November 13, 2018,
22 that contained a signature from Respondent.

23 119. Respondent was out of the country (United States) on November 13, 2018.

24 120. During the time at issue in this Complaint, Respondent did not query the PMP for
25 Patient W's Patient Report as required by Nevada law.

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28 ²⁴ Patient V's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

²⁵ Patient W's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

1 21. Patient X²⁶ was a fifty (50) year-old male at the time of the events at issue in this
2 Complaint.

3 122. Respondent provided Patient X with a prescription for Suboxone (buprenorphine),
4 a Schedule III controlled substance and Xanax (alprazolam), a Schedule IV controlled substance,
5 on November 21, 2018.

6 123. The prescriptions for Patient X were on a single paper prescription listing both
7 controlled substances dated November 21, 2018, that contained a signature from Respondent.

8 124. Respondent was out of the country (United States) on November 21, 2018.

9 125. During the time at issue in this Complaint, Respondent did not query the PMP for
10 Patient X's Patient Report as required by Nevada law.

11 126. Patient Y²⁷ was a twenty-three (23) year-old male at the time of the events at issue
12 in this Complaint.

13 127. Respondent provided Patient Y with a prescription for Klonopin (clonazepam), a
14 Schedule IV controlled substance on November 16, 2018.

15 128. The prescription for Patient Y was a paper prescription dated November 16, 2018,
16 that contained a signature from Respondent.

17 129. Respondent was out of the country (United States) on November 16, 2018.

18 130. During the time at issue in this Complaint, Respondent did not query the PMP for
19 Patient Y's Patient Report as required by Nevada law.

20 131. Patient Z²⁸ was a thirty-six (36) year-old female at the time of the events at issue in
21 this Complaint.

22 132. Respondent provided Patient Z with a prescription for buprenorphine, a Schedule
23 III, controlled substance on November 20, 2018.

24 133. The prescription for Patient Z was a paper prescription dated November 20, 2018,
25 that contained a signature from Respondent.

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27 ²⁶ Patient X's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

28 ²⁷ Patient Y's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

²⁸ Patient Z's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

1 134. Respondent was out of the country (United States) on November 20, 2018.

2 135. During the time at issue in this Complaint, Respondent did not query the PMP for
3 Patient Z's Patient Report as required by Nevada law.

4 136. Patient AA²⁹ was a thirty-seven (37) year-old female at the time of the events at
5 issue in this Complaint.

6 137. Respondent provided Patient AA with prescriptions for Suboxone (buprenorphine),
7 a Schedule III controlled substance and Xanax (alprazolam) a Schedule IV controlled substance
8 on November 19, 2018.

9 138. The prescriptions for Patient AA were on a single paper prescription dated
10 November 19, 2018, and it contained a signature from Respondent.

11 139. Respondent was out of the country (United States) on November 19, 2018.

12 140. During the time at issue in this Complaint, Respondent did not query the PMP for
13 Patient AA's Patient Report as required by Nevada law.

14 141. Patient BB³⁰ was a thirty-six (36) year-old female at the time of the events at issue
15 in this Complaint.

16 142. Respondent provided Patient BB with prescriptions for Xanax (alprazolam), a
17 Schedule IV controlled substance and Suboxone (buprenorphine), a Schedule III controlled
18 substance on November 20, 2018.

19 143. The prescriptions for Patient BB were on a single paper prescription dated
20 November 20, 2018, that contained a signature from Respondent.

21 144. Respondent was out of the country (United States) on November 20, 2018.

22 145. During the time at issue in this Complaint, Respondent did not query the PMP for
23 Patient BB's Patient Report as required by Nevada law.

24 146. Patient CC³¹ was a thirty-one (31) year-old female at the time of the events at issue
25 in this Complaint.

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27 ²⁹ Patient AA's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

28 ³⁰ Patient BB's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

³¹ Patient CC's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

1 147. Respondent provided Patient CC with prescriptions for Zolpidem and Xanax
2 (alprazolam), two (2) Schedule IV controlled substances on November 14, 2018.

3 148. The prescriptions for Patient CC were on a single paper prescription dated
4 November 14, 2018, that contained a signature from Respondent.

5 149. Respondent was out of the country (United States) on November 14, 2018.

6 150. During the time at issue in this Complaint, Respondent did not query the PMP for
7 Patient CC's Patient Report as required by Nevada law.

8 151. Patient DD³² was a forty-nine (49) year-old female at the time of the events at issue
9 in this Complaint.

10 152. Respondent provided Patient DD with a prescription for Suboxone
11 (buprenorphine), a Schedule III controlled substance on November 21, 2018.

12 153. The prescription for Patient DD was a paper prescription dated
13 November 21, 2018, that contained a signature from Respondent.

14 154. Respondent was out of the country (United States) on November 21, 2018.

15 155. During the time at issue in this Complaint, Respondent did not query the PMP for
16 Patient DD's Patient Report as required by Nevada law.

17 156. Patient EE³³ was a thirty-right (38) year-old male at the time of the events at issue
18 in this Complaint.

19 157. Respondent provided Patient EE with a prescription for Valium (diazepam) a
20 Schedule IV controlled substance on November 20, 2018.

21 158. The prescription for Patient EE was a paper prescription dated November 20, 2018,
22 that contained a signature from Respondent.

23 159. Respondent was out of the country (United States) on November 20, 2018.

24 160. During the time at issue in this Complaint, Respondent did not query the PMP for
25 Patient EE's Patient Report as required by Nevada law.

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27 _____
28 ³² Patient DD's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

³³ Patient EE's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

1 161. Patient FF³⁴ was a fifty-four (54) year-old female at the time of the events at issue
2 in this Complaint.

3 162. Respondent provided Patient FF with a prescription for Klonopin (clonazepam), a
4 Schedule IV controlled substance, on November 14, 2018.

5 163. The prescription for Patient FF was a paper prescription dated November 14, 2018,
6 that contained a signature from Respondent.

7 164. Respondent was out of the country (United States) on November 14, 2018.

8 165. During the time at issue in this Complaint, Respondent did not query the PMP for
9 Patient FF's Patient Report as required by Nevada law.

10 166. Patient GG³⁵ was a forty-two (42) year-old female at the time of the events at issue
11 in this Complaint.

12 167. Respondent provided Patient GG with a prescription for Klonopin (clonazepam), a
13 Schedule IV controlled substance on November 14, 2018.

14 168. The prescription for Patient GG was a paper prescription dated
15 November 14, 2018, that contained a signature from Respondent.

16 169. Respondent was out of the country (United States) on November 14, 2018.

17 170. During the time at issue in this Complaint, Respondent did not query the PMP for
18 Patient GG's Patient Report as required by Nevada law.

19 171. Patient HH³⁶ was a thirty-two (32) year-old female at the time of the events at issue
20 in this Complaint.

21 172. Respondent provided Patient HH with prescriptions for buprenorphine, a Schedule
22 III controlled substance and Xanax (alprazolam), a Schedule IV controlled substance, on
23 November 16, 2018.

24 173. The prescriptions for Patient HH were on a single paper prescription dated
25 November 16, 2018, that contained a signature from Respondent.

26 _____
27 ³⁴ Patient FF's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

28 ³⁵ Patient GG's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

³⁶ Patient HH's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

1 174. Respondent was out of the country (United States) on November 16, 2018.

2 175. During the time at issue in this Complaint, Respondent did not query the PMP for
3 Patient HH's Patient Report as required by Nevada law.

4 176. Patient II³⁷ was a thirty-eight (38) year-old male at the time of the events at issue in
5 this Complaint.

6 177. Respondent provided Patient II with prescriptions for Suboxone (buprenorphine), a
7 Schedule III controlled substance and Xanax (alprazolam), a Schedule IV controlled substance, on
8 November 13, 2018.

9 178. The prescriptions for Patient II are on a single paper prescription dated
10 November 13, 2018, that contained a signature from Respondent.

11 179. Respondent was out of the country (United States) on November 13, 2018.

12 180. During the time at issue in this Complaint, Respondent did not query the PMP for
13 Patient II's Patient Report as required by Nevada law.

14 181. Patient JJ³⁸ was a fifty-six (56) year-old male at the time of the events at issue in
15 this Complaint.

16 182. Respondent provided Patient JJ with a prescription for Suboxone (buprenorphine),
17 a Schedule III controlled substance, on November 21, 2018.

18 183. The prescription for Patient JJ was a paper prescription dated November 21, 2018,
19 that contained a signature from Respondent.

20 184. Respondent was out of the country (United States) on November 21, 2018.

21 185. During the time at issue in this Complaint, Respondent did not query the PMP for
22 Patient JJ's Patient Report as required by Nevada law.

23 186. Patient KK³⁹ was a thirty-three (33) year-old female at the time of the events at
24 issue in this Complaint.

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26 _____
27 ³⁷ Patient II's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

28 ³⁸ Patient JJ's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

³⁹ Patient KK's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

1 187. Respondent provided Patient KK with a prescription for Suboxone
2 (buprenorphine), a Schedule III controlled substance, on November 14, 2018.

3 188. The prescription for Patient KK was a paper prescription dated
4 November 14, 2018, that contained a signature from Respondent.

5 189. Respondent was out of the country (United States) on November 14, 2018.

6 190. During the time at issue in this Complaint, Respondent did not query the PMP for
7 Patient KK's Patient Report as required by Nevada law.

8 191. Patient LL⁴⁰ was a thirty-eight (38) year-old male at the time of the events at issue
9 in this Complaint.

10 192. Respondent provided Patient LL with a prescription for Suboxone (buprenorphine),
11 a Schedule III controlled substance, on November 16, 2018.

12 193. The prescription for Patient LL was a paper prescription dated November 16, 2018,
13 that contained a signature from Respondent.

14 194. Respondent was out of the country (United States) on November 16, 2018.

15 195. During the time at issue in this Complaint, Respondent did not query the PMP for
16 Patient LL's Patient Report as required by Nevada law.

17 196. Patient MM⁴¹ was a sixty-one (61) year-old male at the time of the events at issue
18 in this Complaint.

19 197. Respondent provided Patient MM with a prescription for diazepam a Schedule IV
20 controlled substance and Subutex (buprenorphine) a Schedule III controlled substance on
21 November 16, 2018.

22 198. The prescriptions for Patient MM were on a single paper prescription dated
23 November 16, 2018, that contained a signature from Respondent.

24 199. Respondent was out of the country (United States) on November 16, 2018.

25 200. During the time at issue in this Complaint, Respondent did not query the PMP for
26 Patient MM's Patient Report as required by Nevada law.

27 _____
28 ⁴⁰ Patient LL's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

⁴¹ Patient MM's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

1 201. Patient NN⁴² was a twenty-six (26) year-old male at the time of the events at issue
2 in this Complaint.

3 202. Respondent provided Patient NN with prescriptions for Zubsolv (buprenorphine) a
4 Schedule III controlled substance and Klonopin (clonazepam) a Schedule IV controlled substance
5 on November 21, 2018.

6 203. The prescriptions for Patient NN were on a single paper prescription dated
7 November 21, 2018, that contained a signature from Respondent.

8 204. Respondent was out of the country (United States) on November 21, 2018.

9 205. During the time at issue in this Complaint, Respondent did not query the PMP for
10 Patient NN's Patient Report as required by Nevada law.

11 206. Patient OO⁴³ was a fifty-two (52) year-old male at the time of the events at issue in
12 this Complaint.

13 207. Respondent provided Patient OO with a prescription for Suboxone
14 (buprenorphine), a Schedule III controlled substance on November 21, 2018.

15 208. The prescription for Patient OO was a paper prescription dated
16 November 21, 2018, that contained a signature from Respondent.

17 209. Respondent was out of the country (United States) on November 21, 2018.

18 210. During the time at issue in this Complaint, Respondent did not query the PMP for
19 Patient OO's Patient Report as required by Nevada law.

20 211. Patient PP⁴⁴ was a forty-one (41) year-old male at the time of the events at issue in
21 this Complaint.

22 212. Respondent provided Patient PP with a prescription for Xanax (alprazolam), a
23 Schedule IV controlled substance, on November 20, 2018.

24 213. The prescription for Patient PP was a paper prescription dated November 20, 2018,
25 that contained a signature from Respondent.

26 _____
27 ⁴² Patient NN's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

28 ⁴³ Patient OO's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

⁴⁴ Patient PP's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

1 214. Respondent was out of the country (United States) on November 20, 2018.

2 215. During the time at issue in this Complaint, Respondent did not query the PMP for
3 Patient PP's Patient Report as required by Nevada law.

4 216. Patient QQ⁴⁵ was a forty-nine (49) year-old female at the time of the events at issue
5 in this Complaint.

6 217. Respondent provided Patient QQ with a prescription for alprazolam, a Schedule IV
7 controlled substance, on November 13, 2018.

8 218. The prescription for Patient QQ was a paper prescription dated
9 November 13, 2018, that contained a signature from Respondent.

10 219. Respondent was out of the country (United States) on November 13, 2018.

11 220. During the time at issue in this Complaint, Respondent did not query the PMP for
12 Patient QQ's Patient Report as required by Nevada law.

13 221. Patient RR⁴⁶ was a fifty-six (56) year-old female at the time of the events at issue
14 in this Complaint.

15 222. Respondent provided Patient RR with four (4) prescriptions, one (1) of those
16 prescriptions being lorazepam, a Schedule IV controlled substance, on November 20, 2018.

17 223. The prescription for Patient RR was a paper prescription dated November 20, 2018,
18 that contained a signature from Respondent.

19 224. Respondent was out of the country (United States) on November 20, 2018.

20 225. During the time at issue in this Complaint, Respondent did not query the PMP for
21 Patient RR's Patient Report as required by Nevada law.

22 226. Patient SS⁴⁷ was a thirty-three (33) year-old male at the time of the events at issue
23 in this Complaint.

24 227. Respondent provided Patient SS with a prescription for Suboxone (buprenorphine),
25 a Schedule III controlled substance and Xanax (alprazolam), on November 14, 2018.

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27 ⁴⁵ Patient QQ's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
28 Designation served upon Respondent along with a copy of this Complaint.

⁴⁶ Patient RR's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

⁴⁷ Patient SS's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

1 228. The prescriptions for Patient SS were on a single paper prescription dated
2 November 14, 2018, that contained a signature from Respondent.

3 229. Respondent was out of the country (United States) on November 14, 2018.

4 230. During the time at issue in this Complaint, Respondent did not query the PMP for
5 Patient SS's Patient Report as required by Nevada law.

6 231. Patient TT⁴⁸ was a sixty-eight (68) year-old male at the time of the events at issue
7 in this Complaint.

8 232. Respondent provided Patient TT with a prescription for clonazepam, a Schedule IV
9 controlled substance, on November 15, 2018.

10 233. The prescription for Patient TT was a paper prescription dated November 15, 2018,
11 that contained a signature from Respondent.

12 234. Respondent was out of the country (United States) on November 15, 2018.

13 235. During the time at issue in this Complaint, Respondent did not query the PMP for
14 Patient TT's Patient Report as required by Nevada law.

15 236. Patient UU⁴⁹ was a fifty-seven (57) year-old female at the time of the events at
16 issue in this Complaint.

17 237. Respondent provided Patient UU with a prescription for Zubsolv (buprenorphine) a
18 Schedule III and clonazepam, a Schedule IV controlled substance, on November 20, 2018.

19 238. The prescriptions for Patient UU were on a paper prescription dated
20 November 20, 2018, that contained a signature from Respondent.

21 239. Respondent was out of the country (United States) on November 20, 2018.

22 240. During the time at issue in this Complaint, Respondent did not query the PMP for
23 Patient UU's Patient Report as required by Nevada law.

24 241. Patient VV⁵⁰ was a twenty-eight (28) year-old male at the time of the events at
25 issue in this Complaint.

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27 ⁴⁸ Patient TT's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
28 Designation served upon Respondent along with a copy of this Complaint.

⁴⁹ Patient UU's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

⁵⁰ Patient VV's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

1 242. Respondent provided Patient VV with a prescription for Suboxone (buprenorphine)
2 a Schedule III controlled substance and Xanax (alprazolam), a Schedule IV controlled substance,
3 on November 20, 2018.

4 243. The prescriptions for Patient VV were on a paper prescription dated
5 November 20, 2018, that contained a signature from Respondent.

6 244. Respondent was out of the country (United States) on November 20, 2018.

7 245. During the time at issue in this Complaint, Respondent did not query the PMP for
8 Patient VV's Patient Report as required by Nevada law.

9 246. Patient WW⁵¹ was a thirty-five (35) year-old male at the time of the events at issue
10 in this Complaint.

11 247. Respondent provided Patient WW with prescriptions for Suboxone
12 (buprenorphine) a Schedule III controlled substance and Xanax (alprazolam) a Schedule IV
13 controlled substance, on November 21, 2018.

14 248. The prescriptions for Patient WW were on a paper prescription dated
15 November 21, 2018, that contained a signature from Respondent.

16 249. Respondent was out of the country (United States) on November 21, 2018.

17 250. During the time at issue in this Complaint, Respondent did not query the PMP for
18 Patient WW's Patient Report as required by Nevada law.

19 251. Patient XX⁵² was a fifty-one (51) year-old female at the time of the events at issue
20 in this Complaint.

21 252. Respondent provided Patient XX with prescriptions for clonazepam a Schedule IV
22 controlled substance and Suboxone (buprenorphine) a Schedule III controlled substance, on
23 November 14, 2018.

24 253. The prescriptions for Patient XX were on a single paper prescription dated
25 November 14, 2018, that contained a signature from Respondent.

26 254. Respondent was out of the country (United States) on November 14, 2018.

27
28 ⁵¹ Patient WW's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

⁵² Patient XX's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

1 255. During the time at issue in this Complaint, Respondent did not query the PMP for
2 Patient XX's Patient Report as required by Nevada law.

3 256. Patient YY⁵³ was a fifty (50) year-old male at the time of the events at issue in this
4 Complaint.

5 257. Respondent provided Patient YY with a prescription for Suboxone (buprenorphine)
6 a Schedule III controlled substance, on November 15, 2018.

7 258. The prescription for Patient YY was a paper prescription dated
8 November 15, 2018, that contained a signature from Respondent.

9 259. Respondent was out of the country (United States) on November 15, 2018.

10 260. During the time at issue in this Complaint, Respondent did not query the PMP for
11 Patient YY's Patient Report as required by Nevada law.

12 261. Patient ZZ⁵⁴ was a fifty-five (55) year-old male at the time of the events at issue in
13 this Complaint.

14 262. Respondent provided Patient ZZ with a prescription for Valium (diazepam) a
15 Schedule IV controlled substance on November 21, 2018.

16 263. The prescription for Patient ZZ was a paper prescription dated November 21, 2018,
17 that contained a signature from Respondent.

18 264. Respondent was out of the country (United States) on November 21, 2018.

19 265. During the time at issue in this Complaint, Respondent did not query the PMP for
20 Patient ZZ's Patient Report as required by Nevada law.

21 266. Patient AAA⁵⁵ was a thirty-two (32) year-old male at the time of the events at issue
22 in this Complaint.

23 267. Respondent provided Patient AAA with a prescription for Suboxone
24 (buprenorphine) a Schedule III controlled substance on November 19, 2018.

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27 ⁵³ Patient YY's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

28 ⁵⁴ Patient ZZ's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

⁵⁵ Patient AAA's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

1 268. The prescription for Patient AAA was a paper prescription dated
2 November 19, 2018, that contained a signature from Respondent.

3 269. Respondent was out of the country (United States) on November 19, 2018.

4 270. During the time at issue in this Complaint, Respondent did not query the PMP for
5 Patient AAA's Patient Report as required by Nevada law.

6 271. Patient BBB⁵⁶ was a twenty-five (25) year-old male at the time of the events at
7 issue in this Complaint.

8 272. Respondent provided Patient BBB with a prescription for Suboxone
9 (buprenorphine) a Schedule III controlled substance, on November 15, 2018.

10 273. The prescription for Patient BBB was a paper prescription dated
11 November 15, 2018, that contained a signature from Respondent.

12 274. Respondent was out of the country (United States) on November 15, 2018.

13 275. During the time at issue in this Complaint, Respondent did not query the PMP for
14 Patient BBB's Patient Report as required by Nevada law.

15 276. Patient CCC⁵⁷ was a forty-six (46) year-old male at the time of the events at issue
16 in this Complaint.

17 277. Respondent provided Patient CCC with a prescription for Xanax (alprazolam) a
18 Schedule IV controlled substance, on November 14, 2018.

19 278. The prescription for Patient CCC was a paper prescription dated
20 November 14, 2018, that contained a signature from Respondent.

21 279. Respondent was out of the country (United States) on November 14, 2018.

22 280. During the time at issue in this Complaint, Respondent did not query the PMP for
23 Patient CCC's Patient Report as required by Nevada law.

24 281. Patient DDD⁵⁸ was a thirty-two (32) year-old male at the time of the events at issue
25 in this Complaint.

26 _____
27 ⁵⁶ Patient BBB's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

28 ⁵⁷ Patient CCC's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

⁵⁸ Patient DDD's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

1 282. Respondent provided Patient DDD with a prescription for Suboxone
2 (buprenorphine) a Schedule III controlled substance, on November 13, 2018.

3 283. The prescription for Patient DDD was a paper prescription dated
4 November 13, 2018, that contained a signature from Respondent.

5 284. Respondent was out of the country (United States) on November 13, 2018.

6 285. During the time at issue in this Complaint, Respondent did not query the PMP for
7 Patient DDD's Patient Report as required by Nevada law.

8 286. Patient EEE⁵⁹ was a forty-one (41) year-old female at the time of the events at issue
9 in this Complaint.

10 287. Respondent provided Patient EEE with a prescription for Suboxone
11 (buprenorphine) a Schedule III controlled substance, on November 14, 2018.

12 288. The prescription for Patient EEE was a paper prescription dated
13 November 14, 2018, that contained a signature from Respondent.

14 289. Respondent was out of the country (United States) on November 14, 2018.

15 290. During the time at issue in this Complaint, Respondent did not query the PMP for
16 Patient EEE's Patient Report as required by Nevada law.

17 291. Patient FFF⁶⁰ was a thirty-one (31) year-old female at the time of the events at
18 issue in this Complaint.

19 292. Respondent provided Patient FFF with prescriptions for Valium (diazepam) a
20 Schedule IV controlled substance and Suboxone (buprenorphine) a Schedule III controlled
21 substance, on November 14, 2018.

22 293. The prescriptions for Patient FFF were on a single paper prescription dated
23 November 14, 2018, that contained a signature from Respondent.

24 294. Respondent was out of the country (United States) on November 14, 2018.

25 295. During the time at issue in this Complaint, Respondent did not query the PMP for
26 Patient FFF's Patient Report as required by Nevada law.

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28 ⁵⁹ Patient EEE's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

⁶⁰ Patient FFF's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

1 296. Patient GGG⁶¹ was a sixty-one (61) year-old female at the time of the events at
2 issue in this Complaint.

3 297. Respondent provided Patient GGG with a prescription for Suboxone
4 (buprenorphine) a Schedule III controlled substance, on November 19, 2018.

5 298. The prescription for Patient GGG was a paper prescription dated
6 November 19, 2018, that contained a signature from Respondent.

7 299. Respondent was out of the country (United States) on November 19, 2018.

8 300. During the time at issue in this Complaint, Respondent did not query the PMP for
9 Patient GGG's Patient Report as required by Nevada law.

10 301. Patient HHH⁶² was a twenty-six (26) year-old male at the time of the events at
11 issue in this Complaint.

12 302. Respondent provided Patient HHH with a prescription for Suboxone
13 (buprenorphine) a Schedule III controlled substance, on November 21, 2018.

14 303. The prescription for Patient HHH was a paper prescription dated
15 November 21, 2018, that contained a signature from Respondent.

16 304. Respondent was out of the country (United States) on November 21, 2018.

17 305. During the time at issue in this Complaint, Respondent did not query the PMP for
18 Patient HHH's Patient Report as required by Nevada law.

19 306. Patient III⁶³ was a thirty-three (33) year-old male at the time of the events at issue
20 in this Complaint.

21 307. Respondent provided Patient III with a prescription for Suboxone (buprenorphine)
22 a Schedule III controlled substance, on November 15, 2018.

23 308. The prescription for Patient III was a paper prescription dated November 15, 2018,
24 that contained a signature from Respondent.

25 309. Respondent was out of the country (United States) on November 15, 2018.

26 _____
27 ⁶¹ Patient GGG's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

28 ⁶² Patient HHH's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

⁶³ Patient III's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

1 310. During the time at issue in this Complaint, Respondent did not query the PMP for
2 Patient III's Patient Report as required by Nevada law.

3 311. Patient JJJ⁶⁴ was a thirty-seven (37) year-old female at the time of the events at
4 issue in this Complaint.

5 312. Respondent provided Patient JJJ with prescriptions for Suboxone (buprenorphine) a
6 Schedule II controlled substance and Xanax (alprazolam) a Schedule IV controlled substance, on
7 November 15, 2018.

8 313. The prescriptions for Patient JJJ were on a single paper prescription dated
9 November 15, 2018, that contained a signature from Respondent.

10 314. Respondent was out of the country (United States) on November 15, 2018.

11 315. During the time at issue in this Complaint, Respondent did not query the PMP for
12 Patient JJJ's Patient Report as required by Nevada law.

13 316. Patient KKK⁶⁵ was a fifty-seven (57) year-old female at the time of the events at
14 issue in this Complaint.

15 317. Respondent provided Patient KKK with a prescription for Suboxone
16 (buprenorphine) a Schedule III controlled substance, on November 19, 2018.

17 318. The prescription for Patient KKK was a paper prescription dated
18 November 19, 2018, that contained a signature from Respondent.

19 319. Respondent was out of the country (United States) on November 19, 2018.

20 320. During the time at issue in this Complaint, Respondent did not query the PMP for
21 Patient KKK's Patient Report as required by Nevada law.

22 321. Patient LLL⁶⁶ was a forty (40) year-old female at the time of the events at issue in
23 this Complaint.

24 322. Respondent provided Patient LLL with a prescription for buprenorphine, a
25 Schedule III controlled substance, on November 21, 2018.

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27 ⁶⁴ Patient JJJ's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

28 ⁶⁵ Patient KKK's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

⁶⁶ Patient LLL's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient
Designation served upon Respondent along with a copy of this Complaint.

1 323. The prescription for Patient LLL was a paper prescription dated
2 November 21, 2018, that contained a signature from Respondent.

3 324. Respondent was out of the country (United States) on November 21, 2018.

4 325. During the time at issue in this Complaint, Respondent did not query the PMP for
5 Patient LLL's Patient Report as required by Nevada law.

6 326. Patient MMM⁶⁷ was a twenty-eight (28) year-old male at the time of the events at
7 issue in this Complaint.

8 327. Respondent provided Patient MMM with a prescription for Suboxone
9 (buprenorphine) a Schedule III controlled substance, on November 16, 2018.

10 328. The prescription for Patient MMM was a paper prescription dated
11 November 16, 2018, that contained a signature from Respondent.

12 329. Respondent was out of the country (United States) on November 16, 2018.

13 330. During the time at issue in this Complaint, Respondent did not query the PMP for
14 Patient MMM's Patient Report as required by Nevada law.

15 331. Patient NNN⁶⁸ was a fifty-six (56) year-old female at the time of the events at issue
16 in this Complaint.

17 332. Respondent provided Patient NNN with a prescription for Suboxone
18 (buprenorphine) a Schedule III controlled substance on November 16, 2018.

19 333. The prescription for Patient NNN was a paper prescription dated
20 November 16, 2018, that contained a signature from Respondent.

21 334. Respondent was out of the country (United States) on November 16, 2018.

22 335. During the time at issue in this Complaint, Respondent did not query the PMP for
23 Patient NNN's Patient Report as required by Nevada law.

24 336. Upon information and belief and depending on the type of contract Respondent's
25 practice has with the insurance company at issue, billing with Respondent as the "rendering

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28 ⁶⁷ Patient MMM's true identity is not disclosed herein to protect his privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

⁶⁸ Patient NNN's true identity is not disclosed herein to protect her privacy, but is disclosed in the Patient Designation served upon Respondent along with a copy of this Complaint.

1 provider” may result in a higher billing rate because he is a physician when compared to the
2 provider who actually provided the services, such as an APRN, who may bill at a lower rate.

3 337. Medical records provided by Respondent for Patients C, E, G, and I through NNN
4 do not include progress notes or other documentation from Respondent regarding an examination
5 or appointment with Respondent on the dates that the prescriptions for controlled substances were
6 written for those patients as detailed above.

7 338. Upon information and belief, Respondent prescribed controlled substances for
8 Patients C, E, G, and I through NNN, as described above, without seeing them for an examination
9 or other appointment on the day of their controlled substance prescription.

10 339. Upon information and belief, Respondent did not have a bona fide patient
11 relationship with Patients C, E, G, and I through NNN on the dates when he prescribed controlled
12 substances to them as detailed above.

13 340. Upon information and belief, Respondent left pre-signed paper prescription pads in
14 his office for use by office staff and/or other practitioners while he was out of the country.

15 341. Upon information and belief, Patients C, E, G, and I through NNN received
16 prescriptions written on prescription pads that had been pre-signed by Respondent before he left
17 the country.

18 342. Respondent used templated material for many of his patient’s medical records,
19 including those identified above as Patients A through NNN, and upon information and belief, this
20 caused him to fail to maintain clear, legible, accurate, and complete medical records for his
21 patients.

22 **COUNTS I-LXVI**

23 **NRS 630.301(4) – Malpractice**

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

26 344. NRS 630.301(4) provides that malpractice of a physician is grounds for initiating
27 disciplinary action against a licensee.

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1 345. NAC 630.040 defines malpractice as “the failure of a physician . . . in treating a
2 patient, to use the reasonable care, skill, or knowledge ordinarily used under similar
3 circumstances.”

4 346. As demonstrated by, but not limited to, the above-outlined facts, Respondent failed
5 to use the reasonable care, skill or knowledge ordinarily used under similar circumstances when
6 rendering medical services to Patients A through NNN because he billed for services not rendered,
7 prescribed controlled substances via paper prescription when he was out of the country, failed to
8 check the PMP as required by Nevada law, and failed to examine patients prior to writing
9 prescriptions for controlled substances.

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

12 **COUNTS LXVII-CXXXII**

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

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

16 349. NRS 630.3062(1)(a) provides that the “failure to maintain timely, legible, accurate
17 and complete medical records relating to the diagnosis, treatment and care of a patient” constitute
18 grounds for initiating discipline against a licensee.

19 350. Respondent failed to maintain complete medical records relating to the diagnosis,
20 treatment and care of Patients A through NNN, by failing to completely and correctly document
21 his medical care and treatment for Patients A through NNN or/and by over-reliance on templated
22 material in the medical records for Patients A through NNN, causing the medical records for
23 Patients A through NNN to not be timely, legible, accurate, and complete.

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

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COUNTS CXXXIII-CXCIII

**NRS 630.306(1)(b)(3) – Violation of Statutes and Regulations of the
Nevada State Board of Pharmacy**

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

353. NRS 639.23507 requires that a prescribing practitioner before issuing an initial prescription for controlled substances listed in schedule II, III, or IV, or an opioid that is a controlled substance listed in schedule V, and at least once every ninety (90) days thereafter for the duration of the course of treatment using the controlled substance, obtain a patient utilization report (Patient Report) regarding the patient from the PMP.

354. Respondent failed to obtain any Patient Reports for Patients C, E, G, and I through NNN as required by NRS 639.23507.

355. This conduct violates NRS 630.306(1)(b)(3).

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

COUNTS CXCIV-CCLIV

**NRS 630.3062(1)(h) – Fraudulent, Illegal, Unauthorized, or Otherwise Inappropriate
Prescribing of Controlled Substances Listed in Schedule II, III, or IV**

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

358. By pre-signing paper prescription pads and providing them to office staff and/or other practitioners so that Respondent's name, Nevada State Board of Pharmacy registration number, and Board license number could be used to prescribe medications to Patients C, E, G, and I through NNN while Respondent was out of the country, Respondent engaged in fraudulent, illegal, unauthorized, or otherwise inappropriate prescribing of controlled substances listed in schedule II, III, or IV.

359. This conduct violates NRS 630.3062(1)(h).

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

3 **COUNTS CCLV–CCLXII**

4 **NRS 630.306(2)(b)(1) – Engaging in Conduct Which is Intended to Deceive**

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

7 362. By billing for services provided to Patients A, B, C, D, E, F, G, and H under his
8 name and NPI number that he did not provide, Respondent engaged in deceptive conduct.

9 363. This conduct violates NRS 630.3062(1)(h).

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

12 **COUNTS CCLXIII–CCLXX**

13 **NRS 630.305(1)(d) – Charging for Services Not Rendered**

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

16 366. NRS 630.305(1)(d) provides that, “charging for visits to the physician’s office
17 which did not occur or for services which were not rendered or documented in the records of the
18 patient,” is grounds for initiating discipline against a licensee.

19 367. Respondent charged for services that were not rendered but were billed according
20 to billing and medical records for Patients A, B, C, D, E, F, G, and H.

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

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

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

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

- 1 3. That the Board determine what sanctions to impose if it determines there has been
- 2 a violation or violations of the Medical Practice Act committed by Respondent;
- 3 4. That the Board award fees and costs for the investigation and prosecution of this
- 4 case as outlined in NRS 622.400;
- 5 5. That the Board make, issue and serve on Respondent its findings of fact,
- 6 conclusions of law and order, in writing, that includes the sanctions imposed; and
- 7 6. That the Board take such other and further action as may be just and proper in these
- 8 premises.

9 DATED this 21st day of February, 2024.

INVESTIGATIVE COMMITTEE OF THE
NEVADA STATE BOARD OF MEDICAL EXAMINERS

10
11
12 By: Sarah A. Bradley
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CERTIFICATE OF SERVICE

I hereby certify that I am employed by the Nevada State Board of Medical Examiners and that on the 22nd day of February, 2024, I served a file-stamped copy of the foregoing **COMPLAINT** and **PATIENT DESIGNATION** via USPS Certified Mail, postage pre-paid, to the following parties:

MATTHEW OBIM OKEKE, M.D.
c/o Liborius Agwara, Esq.
Law Offices of Libo Agwara, Ltd.
2785 E. Desert Inn Rd., Ste. 280
Las Vegas, NV 89121

Tracking No.: 9171 9690 0935 0241 6158 86

DATED this 22nd day of February, 2024.



MERCEDES FUENTES
Legal Assistant
Nevada State Board of Medical Examiners