


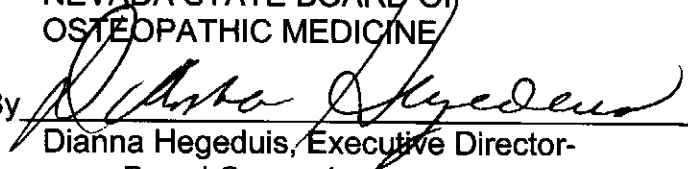
1 **BEFORE THE NEVADA STATE BOARD OF OSTEOPATHIC MEDICINE**
2 IN THE MATTER OF THE COMPLAINT
3 AGAINST
4 KIAN KAVEH, D.O.,
5 RESPONDENT.

**NV STATE BOARD OF
OSTEOPATHIC MEDICINE**
Case No.: PB 06-3718
NOV 02 2009
Filed:

FILED
Executive Director

7 **WRITTEN NOTICE OF ENTRY OF STIPULATED AMENDMENT/REVISIONS TO PRIOR**
8 **SETTLEMENT AGREEMENT AND ORDER OF FULFILLMENT**

9 PLEASE TAKE NOTICE that an order was entered by the Nevada State Board of
10 Osteopathic Medicine approving the amendments/revisions to the parties' previous settlement
11 agreement. A copy of the fully executed agreement of the amendments/revisions and order is
12 attached hereto.

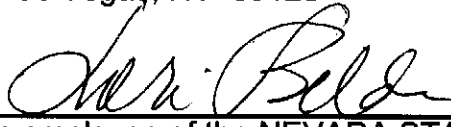
13 DATED THIS 3rd day of November, 2009.

14 NEVADA STATE BOARD OF
15 OSTEOPATHIC MEDICINE
16 By 
17 Dianna Hegeduis, Executive Director-
18 Board Counsel
19 2860 E. Flamingo Rd., Suite D
20 Las Vegas, NV 89121

21 **CERTIFICATE OF MAILING**


22 I hereby certify that on the 3rd day of November, 2009, I served a copy of this notice
23 with attached Agreement & Order upon the following individuals, postage thereon prepaid,
24 addressed to them at their last known address, addressed as follows:

25 Kian Kaveh, D.O.
26 2901 No. Tenaya Way, # 200
27 Las Vegas, NV 89128

28 
An employee of the NEVADA STATE BOARD OF
OSTEOPATHIC MEDICINE

Attorney General's Office
555 E. Washington, Suite 3900
Las Vegas, NV 89101

1 **BEFORE THE NEVADA STATE BOARD OF OSTEOPATHIC MEDICINE**
2 IN THE MATTER OF THE COMPLAINT)
3 AGAINST
4 KIAN KAVEH, D.O.,
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6

NEVADA STATE BOARD OF OSTEOPATHIC MEDICINE
Case No.: NOV 02 2009
PB-06-3718
Filed: **FILED**

Executive Director

7 **AMENDMENT/REVISIONS TO SETTLEMENT AGREEMENT**
8 **& ORDER OF FULFILLMENT**

9 It is hereby stipulated and agreed that the settlement agreement entered into by and
10 between the Nevada State Board of Osteopathic Medicine ("Board") and Respondent, Kian
11 Kaveh, D.O. ("Dr. Kaveh"), shall be modified and/or revised as follows:

12 The settlement agreement, pages 8-9 (copies of which are attached hereto) required
13 Respondent, Dr. Kaveh, to complete twelve (12) hours of continuing medical education "of
14 which six (6) hours must specifically address effective communications with clients, and six (6)
15 hours must specifically address appropriate practices for inclusion of accurate and appropriate
16 information in patient records in a physician's office practice. The twelve (12) hours of
17 continuing education must be completed within (6) month" of the Board's approval of the
18 agreement and the education "must be obtained in courses in which the instructors are
19 present in person (live) at the location at which RESPONDENT attends the course, and the
20 hours will not count towards RESPONDENT'S license renewal continuing education
21 requirements."
22

23 Neither the Board staff nor the Respondent, or his medical office, have been able to
24 find "live" courses which would fulfill this requirement.

25 Respondent has turned in over 58 hours of continuing medical education for the
26 calendar year 2009 in a variety of topics/issues, of which 35 was statutorily required.

27 BASED upon the difficulties in finding "live" classes which would satisfy the previous
28

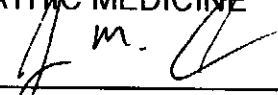
1 agreement, the parties HEREBY STIPULATE AND AGREE that the prior settlement
2 agreement may be modified and/or revised to reflect that the continuing medical education
3 classes taken by Respondent in the year 2009 satisfy the prior settlement agreement, and that
4 an order of fulfillment should be entered by the Board.

5 DATED THIS 29 day of October, 2009.

6 DR. KIAN KAVEH

NEVADA STATE BOARD OF
7 OSTEOPATHIC MEDICINE

8 By _____
9 Dr. Kian Kaveh

By  _____
James Anthony, D.O., Investigative
Board Member

10 NEVADA STATE BOARD OF
11 OSTEOPATHIC MEDICINE

12 By _____
13 Dianna Hegeduis, Executive Director

14 **ORDER**

15 BASED UPON the above agreement, and good cause appearing therefore,

16 IT IS HEREBY ORDERED that the prior settlement agreement is hereby modified as
17 reflected above.

18 IT IS FURTHER ORDERED and noted that Dr. Kaveh has satisfied the requirements,
19 terms, and/or conditions of the settlement agreement filed on or about June 2, 2009, with the
20 Board, and the record shall reflect such FULFILLMENT.

21 DATED THIS _____ day of November, 2009.

22 NEVADA STATE BOARD OF
23 OSTEOPATHIC MEDICINE


24
25
26 By _____
Daniel K. Curtis, D.O., President of the Board

1 agreement, the parties HEREBY STIPULATE AND AGREE that the prior settlement
 2 agreement may be modified and/or revised to reflect that the continuing medical education
 3 classes taken by Respondent in the year 2009 satisfy the prior settlement agreement, and that
 4 an order of fulfillment should be entered by the Board.

5 DATED THIS 03 day of oct, 2009.

6 DR. KIAN KAVEH

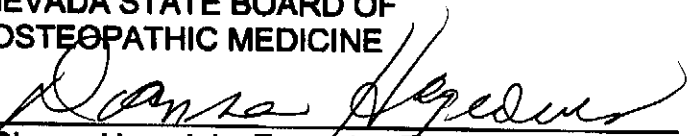
NEVADA STATE BOARD OF
 OSTEOPATHIC MEDICINE

7
 8 By 

By _____
 James Anthony, D.O., Investigative
 Board Member

9 Dr. Kian Kaveh

10 NEVADA STATE BOARD OF
 11 OSTEOPATHIC MEDICINE

12 By 

Dianna Hegeduis, Executive Director

10-26-09

13 **ORDER**

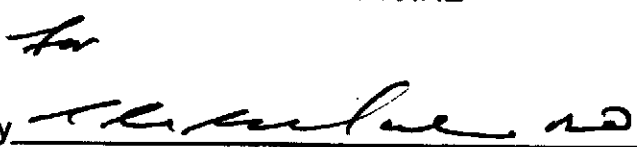
14
 15 BASED UPON the above agreement, and good cause appearing therefore,

16 IT IS HEREBY ORDERED that the prior settlement agreement is hereby modified as
 17 reflected above.

18 IT IS FURTHER ORDERED and noted that Dr. Kaveh has satisfied the requirements,
 19 terms, and/or conditions of the settlement agreement filed on or about June 2, 2009, with the
 20 Board, and the record shall reflect such FULFILLMENT.

21 DATED THIS 2nd day of November, 2009.

22
 23 NEVADA STATE BOARD OF
 OSTEOPATHIC MEDICINE

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By _____
 Daniel K. Curtis, D.O., President of the Board

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EXHIBIT "A"

1 shall implement procedures to insure that he receives immediate notice when such
2 requests for response from him are received;

3 r) RESPONDENT shall respond personally to patients who have
4 complications or adverse results from the treatments rendered by RESPONDENT or
5 under his supervision;
6

7 s) RESPONDENT shall require that any patients' request for a
8 refund be brought to his attention immediately when received, and, if a refund, in
9 whole or in part, is deemed appropriate, RESPONDENT shall direct that such refund
10 be provided immediately.
11

12 **The policies and procedures delineated in 2a through 2s, inclusive above shall**
13 **be prepared and implemented no later than thirty (30) days after the date the**
14 **BOARD approves the instant Agreement.** As used here implementation shall
15 include orally explaining the policies and procedure to RESPONDENT'S staff, and
16 anyone else to whom they apply and provision of written copies to same.
17

18 3. RESPONDENT shall immediately provide notice to the BOARD, in
19 compliance with applicable statute, of any claims of malpractice made against him.

20 4. RESPONDENT shall confer with or refer patients to qualified
21 practitioners, as appropriate, in all instances where RESPONDENT does not have the
22 requisite expertise to adequately diagnose or treat a particular patient.
23

24 5. RESPONDENT shall attend twelve (12) hours of Continuing Education
25 of which six (6) hours must specifically address effective communications with
26 clients, and six (6) hours must specifically address appropriate practices for
27 inclusion of accurate and appropriate information in patient records in a physician's
28 office practice. The twelve (12) hours of continuing education must be completed

1 within six (6) months of the BOARD'S approval of this Agreement, to the extent such
2 continuing education is available, and if not, then as soon as reasonably practicable,
3 but not to exceed twelve (12) months from the time of the Board's approval of this
4 Agreement. Such Continuing Education must be obtained in courses in which the
5 instructors are present in person (live) at the location at which RESPONDENT attends
6 the course, and the hours will not count towards RESPONDENT'S license renewal
7 continuing education requirements.
8

9 6. RESPONDENT shall pay the costs incurred by the BOARD for the
10 investigation and prosecution of this case to the point of settlement, in the sum of FIVE
11 THOUSAND (\$5,000.00) in costs within six (6) months after the date of the BOARD'S
12 order approving the instant Stipulation and Settlement Agreement ("Agreement").
13

14 7. RESPONDENT shall pay to the BOARD the sum of FIVE THOUSAND
15 (\$5,000.00) in fines, within six (6) months after the date of the BOARD'S order
16 approving the instant Stipulation and Settlement Agreement ("Agreement"), a
17 minimum payment of \$2500 shall be made each month until the total sum is paid in
18 full, the first payment to be due thirty (30) days after the date of the BOARD'S Order
19 Approving the Agreement.
20

21 8. The BOARD will not pursue any other action, discipline or fines in
22 connection with the conduct alleged in the Complaint in the above-referenced case.
23

24 9. RESPONDENT understands that the public records law requires the
25 BOARD to make available for inspection this Stipulation and related documents.
26 RESPONDENT also understands that this Agreement must be posted on the
27 BOARD'S website.
28