



1           **WHEREAS**, the allegations against Respondent charged in the Arizona Criminal  
2 Complaint, if true, would constitute violations of Nevada law. Further, Respondent admits that  
3 the acts described above, if accepted by the finder of fact, would establish grounds for discipline  
4 pursuant to NRS Chapter 630; and

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6           **WHEREAS**, Respondent acknowledges that he has read and understands this Consent  
7 Agreement and has stipulated to its contents. In addition, Respondent acknowledges that he is  
8 represented by counsel herein, whom Respondent covenants and agrees is fully capable, competent,  
9 and fully advised in these circumstances and Respondent further covenants and agrees that he enters  
10 into this Agreement knowingly, willingly, and intelligently after full consultation with counsel; and

11           **WHEREAS**, in execution of this Consent Agreement, the Respondent, for himself, his  
12 executors, successors and assigns, hereby releases and forever discharges the state of Nevada, the  
13 Board, the Nevada Attorney General, and each of their members, agents and employees in their  
14 representative capacities, and in their individual capacities, from any and all manner of actions,  
15 causes of action, suits, debts, judgments, executions, claims and demands whatsoever, known and  
16 unknown, in law or equity, that Respondent ever had, now has, may have or claim to have,  
17 against any or all of the persons or entities named in this paragraph arising out of or by reason of  
18 this Consent Agreement or its administration; and

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20           **WHEREAS**, Respondent understands and agrees that this Consent Agreement shall be  
21 given consideration in open session at a meeting duly noticed and scheduled, and that Board counsel  
22 shall advocate for its acceptance, but that the Board has the right to decide in its own discretion  
23 whether or not to approve this Consent Agreement; and

24           **WHEREAS**, Respondent understands and agrees that if the Board approves the terms,  
25 covenants and conditions of this Consent Agreement, then the terms, covenants and conditions  
26 enumerated below shall be binding and enforceable upon him; and

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1 WHEREAS, if the Board does not adopt this Consent Agreement, Respondent will not assert as  
2 a defense that the Board's consideration of this Consent Agreement constitutes bias, prejudice,  
3 prejudgment or other similar defense; and

4 WHEREAS, this Consent Agreement, once approved and signed, is a matter of public  
5 record that will be publicly disseminated as a formal action of the Board and will be reported to  
6 the National Practitioner Data Bank and on the Board's website; and

7 WHEREAS, if any part of the Consent Agreement is later declared void or otherwise  
8 unenforceable, the remainder of the Consent Agreement in its entirety shall remain in force and  
9 effect.

10 NOW THEREFORE, in order to resolve the above captioned matter, Respondent and the  
11 Board hereby agree to the following terms, covenants and conditions:

12 1. Jurisdiction. Respondent is, and at all times mentioned in the above-captioned  
13 matter was, a physician licensed to practice medicine in the State of Nevada subject to the  
14 jurisdiction of the Board to hear and adjudicate charges of violations of the Medical Practice Act  
15 (NRS 630), and to impose sanctions as provided by the Act.

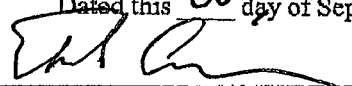
16 2. Admissions. All admissions made by Respondent are solely for final disposition  
17 of this matter and any subsequent related administrative proceedings or civil litigation involving  
18 the Board and Respondent. Therefore, said admissions by Respondent are not intended or made  
19 for any other use, such as in the context of another state or federal government regulatory agency  
20 proceeding, state or federal civil or criminal court proceeding, or any other state or federal court.


21 3. Waiver of Rights. In connection with this Consent Agreement, and the terms,  
22 covenants and conditions contained herein, Respondent knowingly, willingly and intelligently, with  
23 the advice of above identified counsel, waives all rights arising under or pursuant to the United  
24 States Constitution (except the privilege against self-incrimination and the attorney-client privilege),  
25 the Constitution of the State of Nevada, NRS Chapter 630 and NRS Chapter 233B that may be  
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1 available to him or that may apply to him, and Respondent further agrees that the matter may be  
2 settled and resolved in accordance with this Consent Agreement without a hearing or any further  
3 proceeding, and without the right to judicial review. In the event this Consent Agreement is not  
4 approved by the Board, this Agreement shall have no force and effect and Respondent shall have all  
5 rights arising under or pursuant to the United States Constitution, the Constitution of the State of  
6 Nevada, NRS Chapter 630 and NRS Chapter 233B that may be available to him or that may apply to  
7 him in connection with a subsequent proceeding by the Board.

8           4.    **Consent to Entry of Order.** In order to negate the costs and expenses related to a  
9 protracted investigation and potential prosecution related to the aforementioned criminal filing in  
10 the state of Arizona, Respondent hereby agrees and does not contest that an order may be entered  
11 herein by the Board finding that Respondent's license to practice medicine in the state of Nevada  
12 shall be permanently revoked, that Respondent shall be prohibited from ever reapplying for medical  
13 licensure in the state of Nevada, and that Respondent agrees to pay \$2,000.00 in investigative fees  
14 and costs, payable to the Nevada State Board of Medical Examiners within sixty (60) days of  
15 acceptance, adoption and approval of this Agreement by the Board.

16           Dated this 30<sup>th</sup> day of September, 2009

17   
18 Edward O. Cousineau  
19 Attorney for the  
20 Nevada State Board of Medical Examiners

  
Kathleen Janssen, Esq.  
Attorney for Respondent

21           I, Yun Szu Yeh, M.D., hereby agree to the foregoing Consent Agreement in relation to  
22 Nevada State Board of Medical Examiners Case No. 09-11127-1.

23           Dated this 16 day of September, 2009.

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26 Yun Szu Yeh, M.D., Respondent  
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OFFICE OF THE GENERAL COUNSEL  
Nevada State Board of Medical Examiners  
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(775) 688-2559

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**IT IS SO ORDERED** that the above consent agreement for revocation of license to practice medicine in the state of Nevada be accepted in regards to Yun Szu Yeh, M.D., Case #09-11127-1 Done in open session this 6<sup>th</sup> day of October, 2009.



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Charles N. Held, President  
Nevada State Board of Medical Examiners