

BEFORE THE BOARD OF MEDICAL EXAMINERS  
OF THE STATE OF NEVADA

\* \* \* \* \*

In the Matter of Charges and )  
Complaint Against )  
Daniel P. Taheri, M.D., )  
Respondent. )

Case No. 17-31390-1

FILED

MAR 08 2017

NEVADA STATE BOARD OF  
MEDICAL EXAMINERS

By: \_\_\_\_\_

COMPLAINT

The Investigative Committee<sup>1</sup> (IC) of the Nevada State Board of Medical Examiners, hereby issues this formal complaint against Daniel P. Taheri, M.D. (hereinafter referred to as Dr. Taheri or Respondent), a licensed physician in Nevada. After investigating this matter, the IC has a reasonable basis to believe that Respondent has violated provisions of Nevada Revised Statutes (NRS) Chapter 630 and Nevada Administrative Code (NAC) Chapter 630 (collectively, the Medical Practice Act).

The IC alleges the following facts:

1. Respondent is currently licensed in active status (License No. 11900). Respondent was issued his license from the Nevada State Board of Medical Examiners on June 19, 2006, pursuant to the provisions of NRS Chapter 630.

2. On March 8, 2016, the California Medical Board entered into a Stipulated Settlement and Disciplinary Order with Respondent, which became effective April 7, 2016. The California Medical Board publicly reprimanded Respondent for treating patients from 2011

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<sup>1</sup> The Investigative Committee of the Nevada State Board of Medical Examiners, at the time the filing of this Complaint was approved, was composed of Wayne Hardwick, M.D., Theodore B. Berndt, M.D., and Mr. M. Neil Duxbury.

1 through 2013, but failing to sign off on the medical records until 2013; having incomplete medical  
2 records; and failing to document all patient phone calls and communications with patients.

3 3. On or about April 8, 2015, Respondent submitted his application to renew his  
4 Nevada medical license.

5 4. At the time he submitted his renewal application, the California Medical Board had  
6 already filed an Accusation against Respondent on September 5, 2014, which was later amended  
7 on October 26, 2015.

8 5. Respondent did not timely report the March 8, 2016 Stipulated Settlement and  
9 Disciplinary Order to the Nevada State Board of Medical Examiners.

10 6. Respondent did not disclose on his 2015 renewal application that the California  
11 Medical Board had filed an Accusation against him.

12 **Count I**

13 **(NRS 630.301(3))**

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

16 8. NRS 630.301(3) provides that any disciplinary action, including the revocation,  
17 suspension, modification or limitation of a license to practice any type of medicine, taken by  
18 another state, is grounds for initiating disciplinary action against a licensee.

19 9. On March 8, 2016, the California Medical Board entered into a Stipulated  
20 Settlement and Disciplinary Order with Respondent, which became effective April 7, 2016. The  
21 California Medical Board publicly reprimanded Respondent for treating patients from 2011  
22 through 2013, but failing to sign off on the medical records until 2013; having incomplete medical  
23 records; and failing to document all patient phone calls and communications with patients.

24 10. The California Medical Board's March 8, 2016 Stipulated Settlement and  
25 Disciplinary Order was a disciplinary action taken by another state.

26 11. By reason of the foregoing, Respondent is subject to discipline by the Nevada State  
27 Board of Medical Examiners as provided in NRS 630.352.

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**Count II**

**(NRS 630.306(1)(k))**

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

13. NRS 630.306(1)(k) provides that failure by a licensee or applicant to report in writing, within 30 days, any disciplinary action taken against the licensee or applicant by another state, the Federal Government or a foreign country, including, without limitation, the revocation, suspension or surrender of a license to practice medicine in another jurisdiction, is grounds for initiating disciplinary action.

14. Respondent was disciplined by the California Medical Board as described above.

15. Respondent failed to timely report the disciplinary action taken by the California Medical Board.

16. Accordingly, Respondent is in violation of NRS 630.306(1)(k).

17. By reason of the foregoing, Respondent is subject to discipline by the Nevada State Board of Medical Examiners as provided in NRS 630.352.

**Count III**

**(NRS 630.304(1))**

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

19. NRS 630.304(1) provides that obtaining, maintaining or renewing or attempting to obtain, maintain or renew a license to practice medicine by bribery, fraud or misrepresentation or by any false, misleading, inaccurate or incomplete statement is grounds for initiating disciplinary action.

20. Respondent answered "no" to the license renewal application question asking whether he had been asked to respond to an investigation, notified he was under an investigation, investigated, charged with, or convicted of any violation of a statute, rule or regulation governing your practice as a physician by any medical licensing board on his license renewal application dated April 8, 2015.

1           21.     The California Medical Board had filed an Accusation against Respondent on  
2     September 5, 2014, and such Accusation remained pending during Respondent's submission of  
3     his Nevada license renewal application.

4           22.     Accordingly, Respondent's answer on the license renewal application was false.

5           23.     By reason of the foregoing, Respondent is subject to discipline by the Nevada State  
6     Board of Medical Examiners as provided in NRS 630.352.

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

8           1.     That the Nevada State Board of Medical Examiners give Respondent notice of the  
9     charges herein against him and give him notice that he may file an answer to the Complaint herein  
10    as set forth in NRS 630.339(2) within twenty (20) days of service of the Complaint;

11          2.     That the Nevada State Board of Medical Examiners set a time and place for a  
12    formal hearing after holding an Early Case Conference pursuant to NRS 630.339(3);

13          3.     That the Nevada State Board of Medical Examiners determine what sanctions to  
14    impose if it determines there has been a violation or violations of the Medical Practice Act  
15    committed by Respondent;

16          4.     That the Nevada State Board of Medical Examiners make, issue and serve on  
17    Respondent its findings of fact, conclusions of law and order, in writing, that includes the  
18    sanctions imposed; and

19          5.     That the Nevada State Board of Medical Examiners take such other and further  
20    action as may be just and proper in these premises.

21           DATED this 8<sup>th</sup> day of March, 2017.

22                           INVESTIGATIVE COMMITTEE OF  
23                           THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

24           By: Jasmine K. Mehta

25                           Robert Kilroy, Esq.

26                           General Counsel and Attorney for the Investigative Committee

27                           Jasmine K. Mehta, Esq.

28                           Deputy General Counsel and Attorney for the Investigative  
                              Committee


VERIFICATION

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STATE OF NEVADA        )  
                                  : ss.  
COUNTY OF WASHOE    )

Wayne Hardwick, 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 8<sup>th</sup> day of MARCH, 2017.

  
\_\_\_\_\_  
Wayne Hardwick, M.D.

OFFICE OF THE GENERAL COUNSEL

Nevada State Board of Medical Examiners

1105 Terminal Way #301

Reno, Nevada 89502

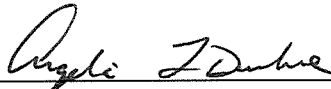
(775) 688-2559

CERTIFICATE OF MAILING

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on 8<sup>th</sup> day of March 2017; I served a file copy of COMPLAINT & Fingerprint Information, via USPS certified electronic return receipt mail to the following:

Daniel Taheri, M.D.  
PO Box 16297  
Beverly Hills, CA 90209

Dated this 8<sup>th</sup> day of March, 2017.



\_\_\_\_\_  
Angelia L. Donohoe  
Legal Assistant