

Nevada State Board of Osteopathic Medicine  
901 American Pacific Dr., # 180 \* Henderson, Nevada 89014  
(702) 732-2147

1 **NEVADA STATE BOARD OF OSTEOPATHIC MEDICINE**

2 In the Matter of:  
3 WELDON BOND, D.O., License  
4 No. 493,  
5 Respondent.

**NV STATE BOARD OF  
OSTEOPATHIC MEDICINE**  
CASE NO. AD 0811100  
MAR 22 2010

**FILED**

6 **NOTICE OF DISMISSAL OF COMPLAINT**

7 **PLEASE TAKE NOTICE** that the Nevada State Board of Osteopathic Medicine  
8 ("Board") **HEREBY DISMISSES** the complaint filed in this action against Dr. Weldon E. Bond,  
9 filed on November 15, 2008, concerning Patient 1 through Patient 17, inclusive. This matter  
10 was resolved via a settlement agreement and the surrender of Dr. Bond's Osteopathic  
11 Medicine License No. 493, in the companion case bearing Board Case No. AD090002.

12 DATED THIS 22<sup>nd</sup> day of March, 2010.

13 NEVADA STATE BOARD OF  
14 OSTEOPATHIC MEDICINE

15 By *Dianna Hegeduis*  
16 Dianna Hegeduis, Executive Director-Board  
17 Counsel  
18 901 American Pacific Dr., Unit 180  
19 Henderson, NV 89014

20 **CERTIFICATE OF MAILING / PROOF OF SERVICE**

21 I hereby certify that on the 22<sup>nd</sup> day of March, 2010, I served a copy of the foregoing  
22 document upon Respondent Weldon Bond, D.O., by sending a true and complete copy  
23 thereof by U.S. Mail, addressed to Respondent at his last known addresses, postage thereon  
24 prepaid, addressed as follows:

23 Dr. Weldon Bond  
24 8490 Willow Mist Drive  
25 Las Vegas, NV 89147

23 Dr. Weldon Bond  
24 2881 S. Valley View, #17  
25 Las Vegas, NV 89102

26 *Michelle Lorne*  
27 An employee of the Nevada State Board of  
28 Osteopathic Medicine

*ORIGINAL*

**BEFORE THE NEVADA STATE BOARD OF OSTEOPATHIC MEDICINE**

IN THE MATTER OF THE COMPLAINT  
AGAINST  
WELDON BOND, D.O.,  
RESPONDENT.

Case No.: AD0811100  
**NV STATE BOARD OF  
OSTEOPATHIC MEDICINE**

NOV 19 2008

**FILED**

**COMPLAINT FOR DISCIPLINARY ACTION  
AND NOTICE OF HEARING**

The NEVADA BOARD OF OSTEOPATHIC MEDICINE ("BOARD"), by and through its counsel, Catherine Cortez Masto, Attorney General of the State of Nevada, and NANCY D. SAVAGE, Senior Deputy Attorney General, and its Investigative Board Member, Scott Manthei, D.O., hereby notifies RESPONDENT WELDON BOND, D.O. of an administrative hearing, which is to be held pursuant to Chapters 633, 622 and 233B of the Nevada Revised Statutes ("NRS") and Chapter 633 of the Nevada Administrative Code ("NAC"). The purpose of the hearing is to consider the allegations stated below and to determine if discipline will be imposed on the RESPONDENT pursuant to the provisions of NRS 633.651 and/or NRS 633.527. The Board asserts and alleges as follows:

**JURISDICTION**

1. RESPONDENT is and has at all relevant times been licensed to practice medicine in the State of Nevada, by the Board of Osteopathic Medicine of the State of Nevada pursuant to the provisions of NRS Chapter 633.
2. At all relevant times, RESPONDENT was engaged in the practice of osteopathic medicine in the County of Clark, State of Nevada.

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

- 1 3. At all relevant times, RESPONDENT held himself out as knowledgeable
- 2 concerning the treatment and procedures being rendered to Patients 1 through
- 3 17, inclusive.
- 4 4. The Board has jurisdiction over the discipline of RESPONDENT during
- 5 RESPONDENT'S practice of osteopathic medicine.
- 6

## 7 **FACTUAL ALLEGATIONS**

### 8 **Patient No. 1**

- 9 5. In or about 2006, BOND provided care and treatment to Patient No. 1 ("P-1").
- 10 6. BOND saw P-1 on multiple occasions in 2006.
- 11 7. BOND prescribed medication, including controlled substances, to P-1 without
- 12 adequate work-up and/or diagnosis.
- 13 8. BOND failed to generate or maintain accurate and complete medical records
- 14 relating to the diagnosis, treatment and care of P-1.
- 15 9. The amounts of controlled substances that BOND prescribed for P-1 were
- 16 excessive under the circumstances.
- 17 10. In rendering care and treatment to P-1, BOND failed to exercise the degree of
- 18 care, diligence and skill ordinarily exercised by osteopathic physicians in good
- 19 standing in the State of Nevada.

### 20 **Patient No. 2**

- 21 11. In or about 2006, BOND provided care and treatment to Patient No. 2 ("P-2").
- 22 12. BOND saw P-2 on multiple occasions in 2006.
- 23 13. BOND prescribed medication, including controlled substances, to P-2 without
- 24 adequate work-up and/or diagnosis.
- 25 14. BOND failed to generate or maintain accurate and complete medical records
- 26 relating to the diagnosis, treatment and care of P-2.
- 27 15. The amounts of controlled substances that BOND prescribed for P-2 were
- 28 excessive under the circumstances.

1 16. In rendering care and treatment to P-2, BOND failed to exercise the degree of  
2 care, diligence and skill ordinarily exercised by osteopathic physicians in good  
3 standing in the State of Nevada.

4 **Patient No. 3**

5 17. In or about 2006, BOND provided care and treatment to Patient No. 3 ("P-3").

6 18. BOND saw P-3 on multiple occasions in 2006.

7 19. BOND prescribed medication, including controlled substances, to P-3 without  
8 adequate work-up and/or diagnosis.

9 20. BOND failed to generate or maintain accurate and complete medical records  
10 relating to the diagnosis, treatment and care of P-3.

11 21. The amounts of controlled substances that BOND prescribed for P-3 were  
12 excessive under the circumstances.

13 22. In rendering care and treatment to P-3, BOND failed to exercise the degree of  
14 care, diligence and skill ordinarily exercised by osteopathic physicians in good  
15 standing in the State of Nevada.

16 **Patient No. 4**

17 23. In or about 2006, BOND provided care and treatment to Patient No. 4 ("P-4").

18 24. BOND saw P-4 on multiple occasions in 2006.

19 25. BOND prescribed medication, including controlled substances, to P-4 without  
20 adequate work-up and/or diagnosis.

21 26. BOND failed to generate or maintain accurate and complete medical records  
22 relating to the diagnosis, treatment and care of P-4.

23 27. The amounts of controlled substances that BOND prescribed for P-4 were  
24 excessive under the circumstances.

25 28. In rendering care and treatment to P-4, BOND failed to exercise the degree of  
26 care, diligence and skill ordinarily exercised by osteopathic physicians in good  
27 standing in the State of Nevada.

28

**Patient No. 5**

- 1
- 2 29. In or about 2006, BOND provided care and treatment to Patient No. 5 ("P-5").
- 3 30. BOND saw P-5 on multiple occasions in 2006.
- 4 31. BOND prescribed medication, including controlled substances, to P-5 without
- 5 adequate work-up and/or diagnosis.
- 6 32. BOND failed to generate or maintain accurate and complete medical records
- 7 relating to the diagnosis, treatment and care of P-5.
- 8 33. The amounts of controlled substances that BOND prescribed for P-5 were
- 9 excessive under the circumstances.
- 10 34. In rendering care and treatment to P-5, BOND failed to exercise the degree of
- 11 care, diligence and skill ordinarily exercised by osteopathic physicians in good
- 12 standing in the State of Nevada.

**Patient No. 6**

- 13
- 14 35. In or about 2006, BOND provided care and treatment to Patient No. 6 ("P-6").
- 15 36. BOND saw P-6 on multiple occasions in 2006.
- 16 37. BOND prescribed medication, including controlled substances, to P-6 without
- 17 adequate work-up and/or diagnosis.
- 18 38. BOND failed to generate or maintain accurate and complete medical records
- 19 relating to the diagnosis, treatment and care of P-6.
- 20 39. The amounts of controlled substances that BOND prescribed for P-6 were
- 21 excessive under the circumstances.
- 22 40. In rendering care and treatment to P-6, BOND failed to exercise the degree of
- 23 care, diligence and skill ordinarily exercised by osteopathic physicians in good
- 24 standing in the State of Nevada.

**Patient No. 7**

- 25
- 26 41. In or about 2006, BOND provided care and treatment to Patient No. 7 ("P-7").
- 27 42. BOND saw P-7 on multiple occasions in 2006.
- 28 43. BOND prescribed medication, including controlled substances, to P-7 without

1 adequate work-up and/or diagnosis.

2 44. BOND failed to generate or maintain accurate and complete medical records  
3 relating to the diagnosis, treatment and care of P-7.

4 45. The amounts of controlled substances that BOND prescribed for P-7 were  
5 excessive under the circumstances.

6 46. In rendering care and treatment to P-7, BOND failed to exercise the degree of  
7 care, diligence and skill ordinarily exercised by osteopathic physicians in good  
8 standing in the State of Nevada.

9 **Patient No. 8**

10 47. In or about 2006, BOND provided care and treatment to Patient No. 8 ("P-8").

11 48. BOND saw P-8 on multiple occasions in 2006.

12 49. BOND prescribed medication, including controlled substances, to P-8 without  
13 adequate work-up and/or diagnosis.

14 50. BOND failed to generate or maintain accurate and complete medical records  
15 relating to the diagnosis, treatment and care of P-8.

16 51. The amounts of controlled substances that BOND prescribed for P-8 were  
17 excessive under the circumstances.

18 52. In rendering care and treatment to P-8, BOND failed to exercise the degree of  
19 care, diligence and skill ordinarily exercised by osteopathic physicians in good  
20 standing in the State of Nevada.

21 **Patient No. 9**

22 53. In or about 2006, BOND provided care and treatment to Patient No. 9 ("P-9").

23 54. BOND saw P-9 on multiple occasions in 2006.

24 55. BOND prescribed medication, including controlled substances, to P-9 without  
25 adequate work-up and/or diagnosis.

26 56. BOND failed to generate or maintain accurate and complete medical records  
27 relating to the diagnosis, treatment and care of P-9.

28 57. The amounts of controlled substances that BOND prescribed for P-9 were

1 excessive under the circumstances.

2 58. In rendering care and treatment to P-9, BOND failed to exercise the degree of  
3 care, diligence and skill ordinarily exercised by osteopathic physicians in good  
4 standing in the State of Nevada.

5 **Patient No. 10**

6 59. In or about 2006, BOND provided care and treatment to Patient No. 10 ("P-10").

7 60. BOND saw P-10 on multiple occasions in 2006.

8 61. BOND prescribed medication, including controlled substances, to P-10 without  
9 adequate work-up and/or diagnosis.

10 62. BOND failed to generate or maintain accurate and complete medical records  
11 relating to the diagnosis, treatment and care of P-10.

12 63. The amounts of controlled substances that BOND prescribed for P-10 were  
13 excessive under the circumstances.

14 64. In rendering care and treatment to P-10, BOND failed to exercise the degree of  
15 care, diligence and skill ordinarily exercised by osteopathic physicians in good  
16 standing in the State of Nevada.

17 **Patient No. 11**

18 65. In or about 2006, BOND provided care and treatment to Patient No. 11 ("P-11").

19 66. BOND saw P-11 on multiple occasions in 2006.

20 67. BOND prescribed medication, including controlled substances, to P-11 without  
21 adequate work-up and/or diagnosis.

22 68. BOND failed to generate or maintain accurate and complete medical records  
23 relating to the diagnosis, treatment and care of P-11.

24 69. The amounts of controlled substances that BOND prescribed for P-11 were  
25 excessive under the circumstances.

26 70. In rendering care and treatment to P-11, BOND failed to exercise the degree of  
27 care, diligence and skill ordinarily exercised by osteopathic physicians in good  
28 standing in the State of Nevada.

**Patient No. 12**

- 1  
2  
3 71. In or about 2006, BOND provided care and treatment to Patient No. 12 ("P-12").  
4 72. BOND saw P-12 on multiple occasions in 2006.  
5 73. BOND prescribed medication, including controlled substances, to P-12 without  
6 adequate work-up and/or diagnosis.  
7 74. BOND failed to generate or maintain accurate and complete medical records  
8 relating to the diagnosis, treatment and care of P-12.  
9 75. The amounts of controlled substances that BOND prescribed for P-12 were  
10 excessive under the circumstances.  
11 76. In rendering care and treatment to P-12, BOND failed to exercise the degree of  
12 care, diligence and skill ordinarily exercised by osteopathic physicians in good  
13 standing in the State of Nevada.

**Patient No. 13**

- 14  
15 77. In or about 2006, BOND provided care and treatment to Patient No. 13 ("P-13").  
16 78. BOND saw P-13 on multiple occasions in 2006.  
17 79. BOND prescribed medication, including controlled substances, to P-13 without  
18 adequate work-up and/or diagnosis.  
19 80. BOND failed to generate or maintain accurate and complete medical records  
20 relating to the diagnosis, treatment and care of P-13.  
21 81. The amounts of controlled substances that BOND prescribed for P-13 were  
22 excessive under the circumstances.  
23 82. In rendering care and treatment to P-13, BOND failed to exercise the degree of  
24 care, diligence and skill ordinarily exercised by osteopathic physicians in good  
25 standing in the State of Nevada.

**Patient No. 14**

- 26  
27 83. In or about 2006, BOND provided care and treatment to Patient No. 14 ("P-14").  
28 84. BOND saw P-14 on multiple occasions in 2006.



- 1 85. BOND prescribed medication, including controlled substances, to P-14 without  
2 adequate work-up and/or diagnosis.
- 3 86. BOND failed to generate or maintain accurate and complete medical records  
4 relating to the diagnosis, treatment and care of P-14.
- 5 87. The amounts of controlled substances that BOND prescribed for P-14 were  
6 excessive under the circumstances.
- 7 88. In rendering care and treatment to P-14, BOND failed to exercise the degree of  
8 care, diligence and skill ordinarily exercised by osteopathic physicians in good  
9 standing in the State of Nevada.

10 **Patient No. 15**

- 11 89. In or about 2006, BOND provided care and treatment to Patient No. 15 ("P-15").
- 12 90. BOND saw P-15 on multiple occasions in 2006.
- 13 91. BOND prescribed medication, including controlled substances, to P-16 without  
14 adequate work-up and/or diagnosis.
- 15 92. BOND failed to generate or maintain accurate and complete medical records  
16 relating to the diagnosis, treatment and care of P-15.
- 17 93. The amounts of controlled substances that BOND prescribed for P-15 were  
18 excessive under the circumstances.
- 19 94. In rendering care and treatment to P-15, BOND failed to exercise the degree of  
20 care, diligence and skill ordinarily exercised by osteopathic physicians in good  
21 standing in the State of Nevada.

22 **Patient No. 16**

- 23 95. In or about 2006, BOND provided care and treatment to Patient No. 16 ("P-16").
- 24 96. BOND saw P-16 on multiple occasions in 2006.
- 25 97. BOND prescribed medication, including controlled substances, to P-16 without  
26 adequate work-up and/or diagnosis.
- 27 98. BOND failed to generate or maintain accurate and complete medical records  
28 relating to the diagnosis, treatment and care of P-16.

1 99. The amounts of controlled substances that BOND prescribed for P-16 were  
2 excessive under the circumstances.

3 100. In rendering care and treatment to P-16, BOND failed to exercise the degree of  
4 care, diligence and skill ordinarily exercised by osteopathic physicians in good  
5 standing in the State of Nevada.

6 **Patient No. 17**

7 101. In or about 2006, BOND provided care and treatment to Patient No. 17 ("P-17").

8 102. BOND saw P-17 on multiple occasions in 2006.

9 103. BOND prescribed medication, including controlled substances, to P-17 without  
10 adequate work-up and/or diagnosis.

11 104. BOND failed to generate or maintain accurate and complete medical records  
12 relating to the diagnosis, treatment and care of P-17.

13 105. The amounts of controlled substances that BOND prescribed for P-17 were  
14 excessive under the circumstances.

15 106. In rendering care and treatment to P-17, BOND failed to exercise the degree of  
16 care, diligence and skill ordinarily exercised by osteopathic physicians in good  
17 standing in the State of Nevada.

18  
19 **VIOLATIONS OF LAW**

20 Pursuant to the allegations above, RESPONDENT is subject to disciplinary action  
21 pursuant to NRS 633.511 for the following conduct:

- 22 1. RESPONDENT committed acts of unprofessional conduct pursuant to NRS  
23 633.131(m), NRS 633.131(f)(1), and NAC 633.350(5) by failing to generate and  
24 maintain accurate and complete medical records relating to his diagnosis, care  
25 and treatment for each Patient, 1 through 17, inclusive;
- 26 2. RESPONDENT committed unprofessional conduct pursuant to NRS 633.131(f)(1)  
27 and NAC 633.350(6) by prescribing controlled substances, to each Patient, 1  
28 through 17, inclusive, in a manner and amount which was excessive;

- 1 3. RESPONDENT committed unprofessional conduct pursuant to NRS 633.131(f)(2)
- 2 and NAC 633.350(6) with respect to each to each Patient, 1 through 17, inclusive,
- 3 by engaging in the practice of osteopathic medicine in a manner which was harmful
- 4 to the public and/or detrimental to the public health, safety or morals which doesn't
- 5 rise to gross or repeated malpractice or professional incompetence;
- 6 4. RESPONDENT committed acts of gross and/or repeated malpractice pursuant to
- 7 NRS 633.041(2) and NRS 633.071 with respect to each Patient, 1 through 17,
- 8 inclusive;
- 9

### 10 DISCIPLINE

11 WHEREFORE, Counts One through Four, inclusive, and each of them, constitute a

12 basis for the initiation of disciplinary action by the Board of Osteopathic Medicine

13 pursuant to NRS 633.511, the Board of Osteopathic Medicine prays that appropriate

14 discipline be imposed upon RESPONDENT as follows:

- 15 1. The Nevada State Board of Osteopathic Medicine or its hearing officer conduct a
- 16 hearing on this Complaint;
- 17 2. Pursuant to NRS 633.651 discipline be imposed upon RESPONDENT, WELDON
- 18 BOND, D.O. for each violation that he has committed, which discipline may include a
- 19 public reprimand and/or licensee revocation or suspension, which can be limited to a
- 20 specified branch of osteopathic medicine, and/or probation with such conditions and
- 21 terms as are deemed just and proper and which are not inconsistent with law;
- 22 3. That RESPONDENT be required to pay all attorney's fees, investigative costs, and
- 23 all other amounts recoverable by the Board, pursuant to NRS 622.400;and
- 24 4. For such other penalties or relief as may be deemed just and proper in the
- 25 circumstances.

### 26 NOTICE OF HEARING

27 A hearing will be set before the BOARD or a hearing officer. You will be notified of the

28 schedule for the hearing and of any pre-hearing conferences.

1  
2 YOUR RIGHTS AT THE HEARING: As a RESPONDENT, have the right to appear and  
3 be heard in your own defense, either personally or through your counsel of choice. At the  
4 hearing, the Board, through its counsel, has the burden of proving the allegations in the  
5 Complaint and will call witnesses, introduce exhibits, and present evidence against you. You  
6 have the right to respond and to present relevant evidence and argument on all issues  
7 involved. You have the right to call and examine witnesses, introduce exhibits, and cross-  
8 examine opposing witnesses on any matter relevant to the issues involved. The hearing will  
9 be recorded by a certified court reporter, and you will be entitled to a copy of the transcript, if  
10 desired, at your expense.  
11

12 You have the right to request that the hearing officer issue subpoenas to compel  
13 witnesses to testify and/or evidence to be offered on your behalf. In making this request, you  
14 may be required to demonstrate the relevance of the witness' testimony and/or evidence.

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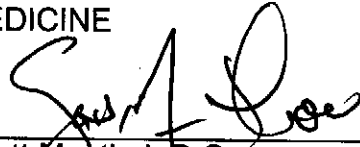
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1 Other important rights and obligations, including your obligation to answer the  
2 complaint, are listed in NRS Chapter 633, NRS Chapter 622, NRS Chapter 233B, and NAC  
3 633.

4  
5 DATED this 15<sup>th</sup> day of November 2008  
6

7  
8 NEVADA BOARD OF OSTEOPATHIC  
9 MEDICINE

10 By   
11 Scott Manthei, D.O.  
12 Investigating Member of the  
13 Nevada Board of Osteopathic Medicine

14 Submitted by:

15 CATHERINE CORTEZ MASTO  
16 Attorney General

17 By   
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19 Senior Deputy Attorney General  
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