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

IN THE MATTER OF THE COMPLAINT  
AGAINST  
JAMES V. MELI, JR., D.O.,  
RESPONDENT.

Case No: AD-06-64-387  
Filed: 11-6-06  
*[Signature]*  
Executive Director

NEVADA STATE BOARD OF  
OSTEOPATHIC MEDICINE

**COMPLAINT**

Pursuant to the provisions of Chapter 633 of the Nevada Revised Statutes, and by virtue of the authority vested in it by said chapter, the Investigative Board Member of the Nevada Board of Osteopathic Medicine, having a reasonable basis to believe that JAMES V. MELI, JR., D.O. (hereinafter referred to as "RESPONDENT," has violated the provisions of said chapter, hereby issues its formal Complaint, stating the Investigative Board Member's charges and allegations, as follows:

1. RESPONDENT is licensed in active status to practice medicine in the state of Nevada, and at all times alleged herein, was so licensed by the Board of Osteopathic Medicine of the State of Nevada pursuant to the provisions of Chapter 633 of the Nevada Revised Statutes.

2. NRS 633.511(1) provides that unprofessional conduct is grounds for the initiation of disciplinary proceedings.

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

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3. NRS 633.131(1) defines "Unprofessional conduct" as follows:

(f) Engaging in any:

(1) Professional conduct which is intended to deceive or which the Board by regulation has determined is unethical.

(k) Willful disobedience of the regulations of the State Board of Health, the State Board of Pharmacy or the State Board of Osteopathic Medicine.

4. Pursuant to NAC 633.350, a licensee engages in unethical conduct if he:

(8) Fails to comply with an order of the board

(9) Engages in any other conduct that the Board determines constitutes unfitness to practice osteopathic medicine.

5. Pursuant to NRS 633.527, an osteopathic physician "...shall report to the Board ... (c) any settlement, award, judgment or other disposition of any action or claim...not later than 45 days after the settlement, award, judgment or disposition..."

6. Pursuant to NRS 633.527(2), an osteopathic physician who fails to report to the Board regarding the disposition of a malpractice action against him, may be fined up to \$5,000.00 for each such violation, in addition to any other fines or penalties permitted by law.

**COUNT ONE**

**(Unprofessional and Unethical Conduct)**

7. The allegations set forth in paragraphs 1 through 6 are incorporated herein by reference, as though set forth in full.

8. Upon information and belief, RESPONDENT was a named Defendant in the matter of MUNDY v. MELI, Case No. A423968, in the Eighth Judicial District Court in and for Clark County, Nevada, filed on September 7, 2000 (hereinafter, the "MUNDY ACTION")

9. Upon further information and belief, RESPONDENT was dismissed from the MUNDY ACTION by way of a Stipulation and Order of Dismissal of All Parties With Prejudice filed on or about October 11, 2002.

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1           10. Pursuant to NRS 633.527, RESPONDENT was required to disclose the  
2 resolution of his involvement in the MUNDY ACTION to the Nevada State Board of  
3 Osteopathic Medicine within forty-five (45) days of the settlement (i.e., on or before November  
4 25, 2002).

5           11. RESPONDENT failed to disclose the resolution of his involvement in the  
6 MUNDY ACTION to the Nevada State Board of Osteopathic Medicine at any time.

7           12. RESPONDENT'S conduct as described herein, should, therefore, be punished  
8 as provided in NRS 633.527(2).

9           13. RESPONDENT'S conduct as described herein, also constitutes "unprofessional  
10 conduct" pursuant to NRS 633.131(1)(f)(1) and NRS 633.131(1)(k).

11           14. RESPONDENT'S conduct as described herein, further constitutes "unethical  
12 conduct" pursuant to NAC 633.350(8) and NAC 633.350(9).

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1 WHEREFORE, the Investigative Member of the Board of Osteopathic Medicine prays  
2 as follows:

3 1. That the Nevada State Board of Osteopathic Medicine conduct a hearing on this  
4 Complaint as provided by statute;

5 2. That, pursuant to NRS 633.651, Respondent, JAMES V. MELI, JR., D.O., be  
6 publicly reprimanded and/or the license of Respondent, JAMES V. MELI, JR., D.O., be  
7 revoked, suspended, limited to a specified branch of osteopathic medicine, or placed on  
8 probation with conditions and terms as the Nevada State Board of Osteopathic Medicine may  
9 deem just and proper and which are not inconsistent with law;

10 3. That Respondent, JAMES V. MELI, JR., D.O., be ordered to pay reasonable  
11 attorney's fees and costs of the investigation and the administrative and disciplinary  
12 proceedings.

13 DATED this 16<sup>TH</sup> day of ~~August~~<sup>Sept.</sup>, 2006.

14  
15 By: 

MATTHEW MCMAHON, D.O.,  
Investigating Member of the  
Nevada Board of Osteopathic Medicine

16  
17  
18 Submitted by:

19 GEORGE CHANOS  
20 Attorney General

21 By: 

Richard I. Dreitzer  
Deputy Attorney General  
555 E. Washington Avenue, Suite 3900  
Las Vegas, Nevada 89101  
(702) 486-3165

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that In Then Matter of the Complaint against JAMES V. MELI, JR., D.O., Nevada State Board of Osteopathic Medicine Case Number AD-06-64-387. I received the Complaint on the 15<sup>TH</sup> day of ~~January~~ <sup>February</sup>, 2008, and that I personally served the Complaint of the 19<sup>TH</sup> day of ~~January~~ <sup>February</sup>, 2008, by delivering a copy to JAMES V. MELI, JR., D.O. at 6301 Mountain Vista St. #100, Henderson Las Vegas Township, in the County of Clark, State of Nevada.

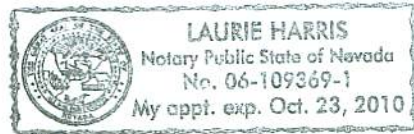
*[Handwritten Signature]*

INVESTIGATOR  
~~BOARD OF OSTEOPATHIC MEDICINE~~  
BUREAU OF CONSUMER PROTECTION

SUBSCRIBED and SWORN to before me this 19<sup>th</sup> day of February, 2008.

*[Handwritten Signature: Laurie Harris]*

NOTARY PUBLIC in and for Said County and State



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

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