



Department of Industrial Relations
 Division of Workers' Compensation - Medical Unit
 P. O. Box 71010
 Oakland, CA 94612

(For DWC use only)

COMPLAINT AGAINST

Khosrow		Tabaddor
Physician's First Name		Physician's Last Name
333 San Carlos Way, Suite B		
Address where the Evaluation took place		
Stockton	95207	559-222-2294
City	Zip Code	Phone Number
6/8/10, 8/20/10, 11/1/11, 3/27/12, 8/29/12, 4/17/14, +		1114339
Date of Evaluation		QME Panel Number
Panel Qualified Medical Evaluation <input checked="" type="checkbox"/>		Agreed Medical Evaluation <input type="checkbox"/>

COMPLAINANT

Tiffany		Anderson
First Name		Last Name
1900 Lakeshore Drive		
Mailing Address		
Lodi		CA 95242
City		State Zip Code
209-331-0208	n/a	tiffanyanderson@mc.com
Daytime Phone Number	Fax Number	E-mail Address

If you are making a complaint and you are not the injured worker, please list the name of the injured worker.

Name of Injured Worker: _____

INFORMATON ABOUT THE CLAIM

If you are the injured worker, please list the name of the insurance company/employer and the name and telephone number of your claims adjuster.

Nancy Urton	916-563-1900
Name of Claims Adjuster	Phone Number of Claims Adjuster
AIMS	VE0700184
Insurance Company or Employer	Claim Number

If your complaint involves an examination performed by a Qualified Medical Examiner in a case pending before the Workers' Compensation Appeals Board, please list the case and the case number. If the WCAB has held a hearing or issued any orders about this examination, please attach the minutes of hearing or the Board order to this complaint.

Tiffany Anderson vs. San Joaquin County Mosquito And Vector Control District; Acclamation Sacramento
Case Name
ADJ7004221, ADJ7004227, ADJ7010682, ADJ7976768, ADJ9066508
Case Number(s)

GIVE US THE DETAILS LOF YOUR COMPLAINT

Please list the details of your complaint and attach any documents that you believe would be useful for the investigation. Use as many additional sheets paper as necessary to tell us about your complaint.

1. Excessive number of appointments with Dr. Tabaddor. Defense counsel recently admitted to me that my case is valued by them at a specific settlement amount and each new medical appointment diminishes my settlement amount. So each appointment with Dr. Tabaddor (compelled or otherwise), has reduced my overall recovery. Dr. Tabaddor has only seen me for my right knee. My right knee has required three surgeries with the last one occurring on November 28, 2011. I have been scheduled to see Dr. Tabaddor as below. At least eight of these dates were after that last knee surgery:

June 8, 2010

August 20, 2010

November 1, 2011

March 27, 2012

August 29, 2012

April 17, 2014

October 13, 2014

January 5, 2015

September 21, 2015

January 18, 2016 (MLK Day)

May 9, 2016 (future appointment, I am again being compelled to attend)

I have calculated from AIMS payment records that Dr. Tabaddor has made no less than \$3,750 for seeing me.

2. Dr. Tabaddor has consistently refused to refer my other injuries to experts as a QME should do. I asked him repeatedly for help with my exposure claims and he refused to make a referral. As a result, I have gone years without any medical care. By comparison, my exposure QME referred me out for tests and for a psychiatric assessment.

3. Dr. Tabaddor has overall been both incompetent and very rude towards me. In his initial "Re-Evaluation" report from the November 1, 2011 examination, Dr. Tabaddor erroneously concluded that I did not require surgery for the June 29, 2011 injury. Four weeks later my primary physician did operate on my knee. Dr. Tabaddor caused me a loss of compensation by not immediately recognizing the June 29, 2011 injury as a new injury. On October 13, 2014, Dr. Tabaddor threw me out of his office because I asked him if he was free of any conflict of interest with the defense counsel and why he had refused to refer out my other medical needs. This ejection caused me emotional trauma and wasted my time as both my mother and cousin were then in hospice care. I wouldn't just have left (as he's said) when I took the time to appear. On January 5, 2015, I refused to appear for Dr. Tabaddor as my mother had just died two weeks prior. I appeared at the September 21, 2015 appointment but this time Dr. Tabaddor failed to show up. I was never given a reason for his non-appearance nor given any advance notice that I needn't appear. My appointment was reset to January 18, 2016. After I had requested a reschedule, opposing counsel obtained an order compelling me to attend but she failed to keep my timeslot open with Dr. Tabaddor. Dr. Tabaddor's assistant refused to acknowledge my appearing so I resorted to creating time-dated photographic evidence. And now I've been scheduled to see Dr. Tabaddor in two month's time and am again under an order to attend. I will attend but I don't see the purpose or need when Dr. Tabaddor will again dismiss all of my knee limitations and find that I am permanent and stationary. Dr. Tabaddor has already stated that, many years ago. And I have not sustained any additional kncc injury since the one in 2011. Dr. Tabaddor treats me with disdain so his only motive in seeing me again has to be his financial gain at my overall detriment.

Date: 3/9/2016


Signature