



reminding him of the trust issues she had with men. At that point, Defendant attempted to put his hand down the patient's pants. The patient pulled away and told Defendant to stop.

5. As Patient PML attempted to leave the office, Defendant took both of her arms, pushed her against the office door, put his finger on her chest, and told her she could not tell anyone because he would lose his practice.

6. After Patient PML left Defendant's office, she went home and told her roommate what had happened. Later that day, she filed a police report with the Tulsa Police Department.

7. On or about January 18, 2012, police detectives interviewed Defendant. When asked if he had touched the patient in any way, Defendant initially lied to the police and denied touching the patient. However, when confronted with saliva evidence found on Patient PML's breast, Defendant then stated "I did lick her nipple". When asked if he attempted to put his hand down the patient's pants, Defendant stated "I might have. I don't remember. It was a spontaneous action". When asked if he was sexually aroused when he attempted to put his hand down the patient's pants, he stated "I guess, yeah".

8. When questioned further as to whether he had grabbed the patient's wrists, Defendant stated that he did not remember grabbing her, but he did kiss her. He admitted that it was "tongue kissing". Defendant also admitted that when the patient attempted to move away from him, he took her arm and pulled her back to kiss him again. When asked if his hand went down the front of the patient's pants further than he'd previously stated, Defendant admitted that he tried, but the patient backed away from him.

9. Police detectives then questioned Defendant about his contact with Patient PML after the assault. Defendant admitted that he had called Patient PML on her cell phone and had asked her if she was "freaked out". The patient told Defendant that she was a "little confused". When detectives asked Defendant what the patient would have been freaked out about, Defendant stated that he was trying to determine if the patient wanted to do it again. Finally, when directly asked if he licked both of the patient's breasts, Defendant admitted that he did.

10. As a result of this incident, Defendant was terminated by Associated Centers for Therapy.

11. As a result of these admissions, on or about February 9, 2012, Defendant was charged with three (3) counts of **FELONY SEXUAL BATTERY** in the District Court of Tulsa County, State of Oklahoma. These charges are still pending.

12. Defendant is guilty of unprofessional conduct in that he:

- A. Engaged in dishonorable or immoral conduct which is likely to deceive, defraud or harm the public in violation of 59 O.S. § 509 (8) and OAC 435:10-7-4 (11).

- B. Engaged in physical conduct with a patient which is sexual in nature, or in any verbal behavior which is seductive or sexually demeaning to a patient in violation of 59 O.S. §509 (17).
- C. Committed an act of sexual abuse, misconduct or exploitation related or unrelated to the licensee's practice of medicine and surgery in violation of OAC 435:10-7-4 (23).
- D. Abused the physician's position of trust by coercion, manipulation or fraudulent representation in the doctor-patient relationship in violation of OAC 435:10-7-4(44).
- E. Violated any provision of the medical practice act or the rules and regulations of the Board or of an action, stipulation, or agreement of the Board in violation of 59 O.S. §509 (13) and OAC 435:10-7-4(39).
- F. Is unable to practice medicine with reasonable skill and safety to patients by reason of age, illness, drunkenness, excessive use of drugs, narcotics, chemicals or any other type of material or as a result of any mental or physician condition in violation of 59 O.S. §509(15) and OAC 435:10-7-4(40).
- G. Is physically or mentally unable to practice medicine and surgery with reasonable skill and safety in violation of OAC 435:10-7-4(17).
- H. Confessed to a crime involving violation of the laws of this state in violation of 59 O.S. §509 (7).
- I. Engaged in predatory sexual behavior in violation of OAC 435:10-7-4(45).
- J. Committed any act which is a violation of the criminal laws of any state when such act is connected with the physician's practice of medicine in violation of 59 O.S. §509 (9).

***Conclusion***

WHEREFORE, plaintiff requests that the Board conduct a hearing, and upon proof of the allegations contained herein, impose such disciplinary action as authorized by law, up to and including the revocation or suspension of the Defendant's license to practice as a physician and surgeon in the State of Oklahoma, the assessment of costs and fees incurred in this action, and

any other appropriate action with respect to Defendant's license to practice as a physician and surgeon in the State of Oklahoma.

Dated this 22 day of February, 2013 at 1:00 p.m.

Respectfully submitted,



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