

**IN AND BEFORE THE OKLAHOMA STATE BOARD  
OF MEDICAL LICENSURE AND SUPERVISION  
STATE OF OKLAHOMA**

**STATE OF OKLAHOMA** )  
**EX REL. THE OKLAHOMA BOARD** )  
**OF MEDICAL LICENSURE** )  
**AND SUPERVISION,** )  
 )  
**Plaintiff,** )  
 )  
**v.** )  
 )  
**BAO QUANG BUI, M.D.,** )  
**MEDICAL LICENSE NO. 12439,** )  
 )  
**Defendant.** )

**FILED**

**MAY 01 2003**

**OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE & SUPERVISION**

**Case No. 03-03-2628**

**COMPLAINT**

COMES NOW the Plaintiff, the State of Oklahoma ex rel. the Oklahoma State Board of Medical Licensure and Supervision (the "Board"), by and through its attorney, Elizabeth A. Scott, Assistant Attorney General, and for its Complaint against the Defendant, Bao Quang Bui, M.D., alleges and states as follows:

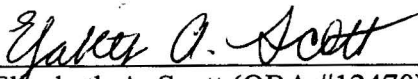
1. The Board is a duly authorized agency of the State of Oklahoma empowered to license and oversee the activities of physicians and surgeons in the State of Oklahoma pursuant to 59 Okla. Stat. § 480 *et seq.*
2. Defendant, Bao Quang Bui, M.D, holds Oklahoma medical license no. 12439.
3. Defendant was the primary supervising physician for a physician assistant named David Fernandez, Oklahoma P.A. license no. 787, from July 2000 through March 2003.
4. During this period of time, Defendant failed to adequately supervise Mr. Fernandez in the performance of his duties as a physician assistant. As a result of Defendant's failure to supervise, Defendant's patients' care was jeopardized due to Mr. Fernandez's negligence and his inability to diagnose and treat Defendant's patients with appropriate skill and safety.
5. Based on the allegations stated above, Defendant is guilty of unprofessional conduct as follows:

- A. Violated, directly or indirectly, the provisions of the Oklahoma Allopathic Medical and Surgical Licensure and Supervision Act, and the rules and regulations of the Board, either as a principal, accessory or accomplice in violation of 59 Okla. Stat. §509(14) and OAC 435:10-7-4(39).
- B. Aided or abetted the practice of medicine and surgery by an unlicensed, incompetent, or impaired person in violation of OAC 435:10-7-4(21).
- C. Failed to report Mr. Fernandez's unprofessional conduct to the Board as required by OAC 435:10-7-4(43).
- D. Engaged in conduct which is likely to deceive, defraud or harm the public in violation of 59 O.S. §509(9) and OAC 435:10-7-4(11).

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 suspension or revocation, 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 15 day of May, 2003 at 2:30 p.m.

Respectfully submitted,

  
Elizabeth A. Scott (OBA #12470)  
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Attorney for State ex rel.  
Oklahoma State Board of Medical Licensure  
and Supervision