

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

STATE OF OKLAHOMA, ex rel,  
OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE AND )  
SUPERVISION, )  
 )  
Plaintiff, )

) Case No. 87-5-505  
)

SANTIAGO OSORIO CARIN, M.D., )  
Medical License No. 13521, )  
 )  
Defendant.

COMPLAINT

COMES NOW J.G. Landreth, Inspector for the Oklahoma Board of  
Medical Licensure and Supervision, being first duly sworn upon  
oath and states:

1. That Santiago Osorio Carin, M.D., holding Oklahoma  
Medical License No. 13521, is in violation of the Oklahoma  
Medical Practice Act, 59 O.S. 1981, Sec. 508 and Sec. 509(9),  
to-wit:

"Whenever any license or certificate has been  
procured or obtained by fraud or  
misrepresentation, or was issued by mistake  
. . . it shall be the duty of the Board of  
Medical Examiners of the State of Oklahoma to  
revoke such license or certificate in the  
same manner as is provided by this act for  
the revocation of license or certificate for  
unprofessional conduct."

"Dishonorable or immoral conduct which is  
likely to deceive or defraud the public."

2. That on or around December 2, 1981, Defendant did sign  
an oath attached to his application for licensure in Oklahoma as  
a physician and the following answers to the following  
questions:

"Have you ever been denied Staff Membership in any  
hospital? No.


Have you ever been warned or censured by, or requested  
to withdraw from any hospital? No."

Said answers were made by the Defendant when he knew and had  
knowledge that his surgical procedures were permanently revoked  
by the Credentials Committee, United States Army Medical

Department Activity, Fort Leonard Wood, Missouri, on March 16, 1981.

3. That on or around July 22, 1987, Defendant did enter a plea of guilty to the criminal charge of receiving and retaining public money in the form of a check from Blue Cross and Blue Shield of Oklahoma, which he was not authorized to retain as salary, pay, or emolument, Defendant knowing said check represented reimbursement for medical services rendered to Mary L. Samuel while a patient at W.W. Hastings Hospital, an Indian Service Hospital, also knowing said check was to be deposited to the United States Department of Treasury in the case United States of America v. Santiago O. Carin, United States District Court for the Eastern District of Oklahoma, Case No. 87-27-CR. That copies of the Plea Agreement and the Superseding Misdemeanor Information are attached hereto and incorporated by reference as if fully set out herein and marked as Exhibits A and B.

WHEREFORE, Complainant prays this Board to conduct a hearing and upon proof of the allegations contained herein that such disciplinary action be taken by the Board as is authorized by law.

  
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J.G. LANDRETH, Inspector  
State Board of Medical Licensure  
and Supervision

Subscribed and sworn to before me this 3<sup>rd</sup> day of August  
1987.

  
\_\_\_\_\_  
Notary Public

My commission expires:  
10-3-90