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,)			
)			
v •)			
)			
MANEK E. ANKLESARIA, M.D.)	CASE	NO.	91-09-1221
Medical License No. 13574,)			
)			
Defendant.)			

AMENDED COMPLAINT

COMES NOW Stephen Washbourne, Investigator for the Oklahoma State Board of Medical Licensure and Supervision, being first duly sworn upon oath and states:

- 1. That Manek E. Anklesaria, M.D., holding Oklahoma Medical License No. 13574, is in violation of the Oklahoma Medical Practice Act, 59 O.S. 1991, Sec. 509, Paragraph 9, to-wit:
 - "9. Dishonorable or immoral conduct which is likely to deceive or defraud the public."
- 2. That on or around May 6, 1991, female patient R.K. came to the Defendant's office for an ophthalmological appointment. As patient R.K. was seated and looking through a theropter, Defendant took the patient's hand. The patient snatched her hand away. Then Defendant took the patient's hand again and placed it on his erected penis.
- 3. That in the fall of 1990, female patient T.V. was referred to the Defendant for ophthalmological care. During her first visit to the Defendant's office, the Defendant held the patient's hand, stared at the patient's chest and advised the patient, "Now you can practice safe sex," when Defendant learned of the nature of the patient's recent surgery.
- 4. That during the patient's second visit, the Defendant again stared at the patient's chest and remarked, "My, you are well endowed and I mean that as a compliment."

5. That during the patient's third visit, the Defendant moved the patient from one examining room to a different examining room further down the hall. As the patient T.V. was seated and looking through a machine, the Defendant held the patient's hand. After a minute, the Defendant laid the patient's hand on his erected penis. During this same visit, Defendant questioned the patient as to whether the patient had a boyfriend and whether the patient was interested in seeing the Defendant not as a doctor and patient. As the patient was leaving, the Defendant put his arms around the patient's back and buttocks and kissed her. After the patient pushed him away, Defendant put his hand on her left breast and attempted to fondle it.

6. That all of the above acts are dishonorable or immoral conduct when they occur in the context of a professional doctor/patient ophthalmological examination.

7. That the above acts deceive or defraud the public in that female patients come to the physician's office seeking medical care and the female patients do not realize and they are not forewarned that they are the subject of a sexual hunt.

8. That Defendant is perpetuating significant harm to public health, safety and welfare by continuing the acts and omissions set forth in the above allegations.

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.

STEPHEN WASHBOURNE, Investigator Oklahoma State Board of Medical Licensure and Supervision

Subscribed and sworn to before me this 19 day of august , 1992.

Janut & Omens Notary Public

My Commission expires: