

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

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

Janet L Owens
Notary Public

My Commission expires:
12-17-92