

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. 93-01-1471  
Medical License No. 13574, )  
 )  
Defendant. )

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., formerly holding Oklahoma Medical License No. 13574, now suspended, was 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 in 1989 and 1990, the Defendant was licensed as a physician and surgeon in Oklahoma, and that during that time Defendant sexually harassed and battered female patient L.W., and A.R., the mother of a minor patient, in the course of his medical practice of ophthalmology.

3. 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 1 day of February, 1993.

Janet L Owens  
Notary Public

My Commission expires:  
12-20-96