

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,

MANEK E. ANKLESARIA, M.D.
Medical License No. 13574,

CASE NO. 93-01-1471

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., formerly holding Oklahoma Medical License No. 13574, now suspended, was in violation of the Oklahoma Medical Practice Act, 59 O.S. 1991, 509, Paragraph 9, to-wit:

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

2 That in approximately 1990, patient L.W. took her minor son to see the Defendant. After Defendant examined her son, Defendant placed L.W. in the examination chair. Defendant put a machine in front of L.W.'s eyes. Defendant took hold of L.W.'s and placed it on Defendant's erect penis. L.W. pulled her hand away and left the office

3. That in approximately September or October, 1990, L.W. was referred to Defendant by Department of Human Services. L.W. not want to return to Defendant, but had no choice. Defendant's examination of L.W. was routine. As L.W. was leaving the examination room, Defendant came up behind her and put both arms around her and put his hands on her breasts and pushed himself up against her back. Defendant told L.W. to call him. L.W. left as soon as possible

4 That in approximately 1989, A.R. took her son to the Defendant. On approximately the fifth visit, Defendant had the machine over her son's eyes Defendant then exposed himself to A.R. and gestured for A.R. to touch Defendant's erect penis. A.R. left the room

On A.R.'s sixth visit, the same actions occurred.

6. On A.R.'s seventh visit, the same actions occurred.

After A.R.'s seventh visit, Defendant telephoned A.R. at her home and attempted to initiate a sexual relationship with Defendant. A.R. hung up on the Defendant.

8. That in approximately May, 1988, O.M. accompanied her elderly grandmother to Defendant's office. Defendant placed O.M.'s grandmother in the examination chair and placed an eye machine in front of her face Defendant asked O.M. if she wanted to look through the machine to see what a cataract looked like O.M. bent over to look into the machine. Defendant grabbed O.M.'s hand and placed it on his penis and rubbed O.M.'s hand on Defendant's crotch area. O.M. jerked her hand away. O.M. demanded that Defendant get her grandmother out from behind the machine so they could leave immediately.

9. Defendant said O.M.'s grandmother had to return the next day for a second examination. O.M. asked her 17 year old son to accompany her. The appointment was set for 6:00 p.m. No other patients were present. When Defendant saw O.M. and her grandmother, he opened the door leading to the examination room. At that time, Defendant saw O.M.'s son was present, and Defendant became angry, told O.M. that he did not need to see her grandmother and that he would admit her to the hospital. Defendant then slammed the door shut.

10. 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 26 day of
March, 1993.

Janet L Owens
Notary Public

My Commission expires
12-26-96