

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

MANUEL J. RAMIREZ, M.D.
Medical License No. 14479,

CASE NO. 87-8-531

Defendant.

COMPLAINT OF CONTEMPT
OF FINAL ORDER
ON NONPAYMENT OF COSTS

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

That on or around March 17, 1990, following notice and hearing, Manuel J. Ramirez, M.D., holding Oklahoma Medical License No. 14479, was issued a Final Order from the Oklahoma Board of Medical Licensure and Supervision concerning proceedings held on that date.

2. Said Order provided that the Defendant be placed on probation to the Oklahoma State Board of Medical Licensure and Supervision for a period of three (3) years beginning on November 14, 1988, under certain enumerated terms and conditions which included the following, to-wit:

"(i Pursuant to Section 26, H.B. 1478, 1987 Legislature, Defendant shall promptly pay upon receipt of invoice from the Investigation Division of the Board the costs of investigation, prosecution and probation of this case.

(j) That violation of any of the terms and conditions of probation shall be grounds for additional charges to be presented to the Board after notice to the Defendant."

3. That said Final Order has remained in full force and effect and has not been modified or amended by the Oklahoma Board of Medical Licensure and Supervision to date

4. That since the date of February 6, 1990, the Defendant has deliberately and willfully failed and neglected to promptly

pay upon receipt of invoice from the Investigation Division of the Board the costs of investigation, prosecution and probation of this case in the amount of \$1,259.67.

5. That the Defendant's inaction in failing to make the aforesaid payments is contrary to the plain terms and conditions of the Final Order issued by the Board.

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, to specifically include revocation and/or suspension of the Defendant's license to practice medicine and surgery in Oklahoma, and for such other and further relief as the Board may grant

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

Subscribed and sworn to before me this 1st day of August, 1990.

Herbert Beaton
Notary Public

My Commission expires
September 15, 1991