

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.    )  
  )  
NARESHKUMAR PATEL, M.D.            ) CASE NO. 87-7-514  
Medical License No. 14640,            )  
  )  
  ) Defendant.                                )

COMPLAINT

COMES NOW D.C. Mosshart, Investigator for the Oklahoma State Board of Medical Licensure and Supervision, being first duly sworn upon oath and states:


1. That Nareshkumar Patel, M.D., holding Oklahoma Medical License No. 14640, is in violation of the Oklahoma Medical Practice Act, 59 O.S. 1981, Sec. 509 and Sec. 509(11), for unprofessional conduct and for failure to keep complete and accurate records of purchase and disposal of controlled drugs or narcotic drugs.

That on or around June 10, 1989, Defendant did perform a surgical procedure on patient E.S.B., and said procedure was performed in an unprofessional manner and in an unprofessional setting.

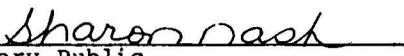
3. That in <sup>ON OR ABOUT</sup> ~~December 7, 1988~~ <sup>or</sup> ~~January 1, 1989 of 19<sup>89</sup>, Defendant abandoned a patient and left the premises of his clinic to take a friend to the airport and left the patient in a post-operative condition in the treatment room under anesthesia, and the patient's blood pressure dropped and the patient required emergency medical assistance.~~

4. That the Defendant did not comply with applicable state laws and regulations relating to the writing of prescriptions for controlled dangerous substances, in failing to maintain dispensing records for dangerous drugs, and in failing to keep complete and accurate records of the purchase and dispensing of controlled drugs or narcotic drugs.

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.

  
D.C. MOSSHART, Investigator  
State Board of Medical Licensure  
and Supervision

Subscribed and sworn to before me this 27 day of  
December, 1989.

  
Notary Public

My Commission expires:  
December 13, 1993