

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.)
Medical License No. 14640,)

CASE NO. 90-09-1129

Defendant

COMPLAINT

COMES NOW Jim Birdsong, Investigator for the Oklahoma State Board of Medical Licensure and Supervision, being first duly sworn upon oath and states:

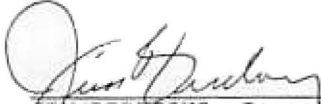
1. That Nareshkumar Patel, M.D., holding Oklahoma Medical License No. 14640, is in violation of the Oklahoma Medical Practice Act, 59 O.S. 1991, Sec. 509

2. That on or around April 14, 1992, Defendant did transport human fetuses and tissue to a site in Pottawatomie County, Oklahoma, and did attempt to burn same in a vacant lot.

3. That Defendant failed to totally burn the human fetuses and tissue and abandoned the site without any further attempt or provisions for disposal.

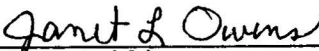
4. That such acts and omissions constitute unprofessional conduct for a physician in the State of Oklahoma.

WHEREFORE, Complainant prays this Board to conduct a hearing on the merits and upon proof of the allegations contained herein that such disciplinary action be taken by the Board as is authorized by law.



JIM BIRDSONG, Investigator
Oklahoma State Board of
Medical Licensure and Supervision

Subscribed and sworn to before me this 11 day of May, 1992.



Notary Public

My Commission expires
12-17-92