## IN AND BEFORE THE OKLAHOMA STATE BOARD OF MEDICAL LICENSURE AND SUPERVISION

## STATE OF OKLAHOMA

STATE OF OKLAHOMA, ex rel.			
OKLAHOMA BOARD OF MEDICAL			
LICENSURE AND SUPERVISION,	)		
	)		
Plaintiff,	)		
	)		
	j	Case No.	94-03-1594
	j		
YASH CHOPRA, M.D.,	j		
Medical License No. 15727	j		
	)		
Defendant.	)		

## COMPLAINT

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

- 1. The defendant is a medical doctor licensed by the Board;
- 2. In his capacity as a medical doctor, the defendant practiced as an anesthesiologist, and has so practiced at Baptist Medical Center in Oklahoma City, Oklahoma;
- 3. In the course of his practice at Baptist Medical Center, the defendant has, on numerous occasions, placed his hands upon the breasts of female patients in his care. Specifically, following the placement of an epidural in his patients, the defendant then held, touched, fondled and/or caressed the breasts of his patients

reasons which were not medically appropriate or necessary;

4. The conduct of the defendant described above was described as embarrassing, demeaning, domineering and wrongful by the defendant's patients and was perpetrated upon the patients in the guise of medical necessity;

5. The patients of the defendant did not consent to the unnecessary and improper touching, holding, fondling or caressing

of their breasts by the defendant;

6. The action of the defendant constituted a non-consensual

physical contact;

7. The Defendant, Yash Chopra, M.D., who holds Oklahoma Medical

License No. 15727, is in violation of the Oklahoma Medical Practice

Act, specifically, 59 O.S. § 509 (9);

8. The Defendant would perpetuate a significant harm to the

public health, safety and welfare by continuing the acts and

omissions set forth in the above allegations.

WHEREFORE, premises considered, the 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.

Jim Willis, Investigator Oklahoma Board of Medical Licensure and Supervision

Subscribed and sworn to before me this 22 day of December, 1994

Notary Public

My commission expires:

JRJ/jj:Chopra.com