



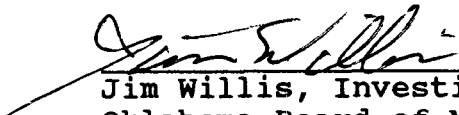
5. The patients of the defendant did not consent to the unnecessary and improper touching, holding, fondling or caressing of their breasts by the defendant;

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.

  
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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:

12-20-96