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

STATE OF OKLAHOMA

**FILED**

APR 01 1999

OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE & SUPERVISION

STATE OF OKLAHOMA, ex rel., )  
OKLAHOMA BOARD OF )  
MEDICAL LICENSURE AND )  
SUPERVISION, )

Plaintiff, )

vs. )

**CASE NO. 99-01-2057**

MING-KAO CHANG, M.D. )  
Medical License No. 16699, )

Defendant. )

**COMPLAINT**

Plaintiff, the State of Oklahoma, ex rel, Oklahoma State Board of Medical Licensure and Supervision ("Board"), through Jim Willis, Investigator ("Complainant"), for its Complaint against the Defendant, Ming-Kao Chang, M.D., alleges and states as follows:

1. The Board is a duly authorized agency of the State of Oklahoma empowered to license and oversee the activities of physicians and surgeons in the State of Oklahoma pursuant to 59 O.S. Supp. 1998, Sec. 480 et seq.

2. Defendant, Ming-Kao Chang, M.D., holds Oklahoma Medical License No. 16699.

3. Defendant admitted in his 1998 Oklahoma medical license renewal form that in approximately February, 1998, Defendant was diagnosed with the condition of Schizophrenia and was under the medical care of a psychiatrist, Amanda Troutman, M.D., Psychiatric Clinic, University of Oklahoma College of Medicine, Tulsa, Oklahoma.

4. On approximately March 9, 1999, Defendant's treating physicians Michelle McCall, M.D., and William R. Yates, M.D., report that Defendant's "condition at this time would impair his capacity to practice medicine."


8. Defendant is guilty of unprofessional conduct in that he:

Demonstrated inability to practice medicine with reasonable skill and safety to patients by reason of illness or as a result of any mental condition in violation of 59 O.S. Supp. 1998, Sec. 509(16), and Board Rules 435:10-7-4(17) and (40).

Demonstrated conduct likely to deceive, defraud or harm the public in violation of Board Rule 435:10-7-4(11).

**WHEREFORE**, Complainant prays this Board conduct a hearing, and upon proof of the allegations contained herein, impose such disciplinary action as authorized by law, up to and including suspension or revocation of license and any other appropriate action with respect to Defendant's license to practice as a physician and surgeon in the State of Oklahoma, including an assessment of costs and attorney fees incurred in this action as provided by law.

Respectfully submitted,

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

STATE OF OKLAHOMA     )  
COUNTY OF OKLAHOMA   ) ss.

Subscribed and sworn to before me this 31 day of March,  
1999.

Garnit L Owens  
Notary Public

My Commission expires:

12-20-2000