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

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STATE OF OKLAHOMA, ex rel, OKLAHOMA STATE BOARD OF MEDICAL LICENSURE AND SUPERVISION, Plaintiff, v. MING-KAO CHANG, M.D., Defendant.

OKLAHOMA STATE ... UP DICAL LICENSURE & SUPERVIEIDN

APR 26 1996

Case No. 99-01-2057 License #16699

ANSWER

COMES NOW, Ming-Kao Chang, M.D., Medical License Number 16699, Defendant in

the above-styled cause, and for his Verified Answer under oath alleges and states:

That said Ming-Kao Chang, M.D. denies each and every material allegation of said

Complaint unless the same is admitted herein.

2. That the said Ming-Kao Chang, M.D. admits that he holds license number 16699,

as alleged in ¶2.

3. That the said Ming-Kao Chang, M.D. admits the allegations contained in ¶ 3, that

he reported the diagnosis of a medical condition and that he was under the care of a psychiatrist.

4. That the said Ming-Kao Chang, M.D. denies the allegations of ¶ 4, specifically:

A. Ming-Kao Chang, M.D. denies that the diagnosed medical condition at this time impairs his capacity to practice medicine.

B. Ming-Kao Chang, M.D. denies he is guilty of unprofessional conduct.

C. Ming-Kao Chang, M.D. denies that he has demonstrated an 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).

D. Ming-Kao Chang, M.D. denies he has demonstrated conduct likely to deceive, defraud or harm the public in violation of Board Rule 435:10-7-4(11).

WHEREFORE, this Defendant prays that this Board, upon hearing the evidence to be

presented at said hearing on the Complaint filed herein in conjunction with this Answer, dismiss

this citation as against the Defendant, Ming-Kao Chang, M.D.

Respectfully submitted,

MACK K. MARTIN, OBA #5738 MARTIN LAW OFFICE Suite 360 119 North Robinson Avenue Oklahoma City, Oklahoma 73102 Telephone (405) 236-8888 Facsimile (405) 236-8884 ATTORNEY FOR DEFENDANT MING-KAO CHANG, M.D.

## **CERTIFICATE OF SERVICE**

I hereby certify that I mailed a full, true and exact copy of the foregoing Answer was mailed to Board of Medical Licensure and Supervision, State of Oklahoma, P.O. Box 18256, Oklahoma City, Oklahoma, 73154-0256 and Mr. Daniel J. Gamino, Attorney at Law, 3315 Northwest 63rd Street, Oklahoma City, Oklahoma, 73116, on this **2710** day of April, 1999, with full and correct postage thereon prepaid.

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