

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

STATE OF OKLAHOMA)
EX REL. THE OKLAHOMA BOARD)
OF MEDICAL LICENSURE)
AND SUPERVISION,)

Plaintiff)

v.)

Case No. 02-07-2534

MICHAEL ELLIS, M.D.,)
OKLAHOMA MEDICAL LICENSE NO. 17541,)

Defendant.)

COMPLAINT

COMES NOW the plaintiff, the State of Oklahoma ex rel. the Oklahoma State Board of Medical Licensure and Supervision (the "Board"), by and through its attorney, Elizabeth A. Scott, Assistant Attorney General, and for its Complaint against the Defendant, Michael Ellis, M.D., Oklahoma medical license no. 17541, 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 Okla. Stat. §480 *et seq.*

2. Defendant, Michael Ellis, M.D., holds Oklahoma medical license no. 17541

3. On or about May 14, 2002, the Mississippi State Board of Medical Licensure entered an order indefinitely prohibiting Defendant from practicing medicine in the State of Mississippi based upon a finding that Defendant was guilty of practicing medicine in such a manner as to impose an immediate threat to the public, professional incompetency in the practice of medicine and dishonorable or unethical conduct likely to deceive, defraud and harm the public.

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

A. Was subject to disciplinary action of another state or jurisdiction based upon acts or conduct by the licensee similar to acts or conduct that would constitute grounds for

action as defined in this section pursuant to OAC 435:10-7-4(31).

Conclusion

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

Dated this 8th day of August, 2002 at 10:00 a.m.

Respectfully submitted,



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Attorney for the State of Oklahoma ex rel.
Oklahoma State Board of Medical
Licensure and Supervision