

5. In or around 2007, Patient RPD began working for Defendant as an unlicensed Medical Assistant. During this time, Defendant continued to act as Patient RPD's personal physician.

6. Beginning in or around May 2010, Defendant and Patient RPD began to engage in a sexual relationship. The sexual conduct occurred both at the office as well as local motels. Defendant admits that he engaged in a sexual relationship with Patient RPD at the same time he was maintaining a doctor-patient relationship and prescribing dangerous drugs to her.

7. In or around August 2010, Patient RPD became pregnant. Her estimated due date was May 30, 2011.

8. Defendant's medical chart on Patient RPD reflects that after she became pregnant, Defendant continued to act as her primary care physician as well as her obstetrician. No other physicians treated her during this time.

9. After Patient RPD became pregnant, her sexual relationship with Defendant continued as they met at local motels from November 2010 through February 2011. Defendant claims that they could not engage in actual sexual intercourse during this time since she was bleeding due to her pregnancy. They did, however, engage in sexual contact. Patient RPD continued to see only Defendant for her medical needs and prenatal care through at least March 13, 2011. At that time, Patient RPD was 29 weeks pregnant.

10. After Board investigators contacted Defendant in March 2011, Defendant claims that he transferred Patient RPD's care to another physician.

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

- A. Engaged in dishonorable or immoral conduct which is likely to deceive, defraud or harm the public in violation of 59 O.S. § 509 (8) and OAC 435:10-7-4 (11).
- B. Engaged in physical conduct with a patient which is sexual in nature, ... in violation of 59 O.S. §509 (17).
- C. Committed an act of sexual ... misconduct or exploitation related or unrelated to the licensee's practice of medicine and surgery in violation of OAC 435:10-7-4 (23).
- D. Abused the physician's position of trust by coercion [or] manipulation ... in the doctor-patient relationship in violation of OAC 435:10-7-4(44).

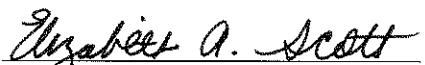
- E. Violated any provision of the medical practice act or the rules and regulations of the Board or of an action, stipulation, or agreement of the Board in violation of 59 O.S. §509 (13) and OAC 435:10-7-4(39).

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 10th day of June, 2011 at 8:00 a.m.

Respectfully submitted,



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Oklahoma State Board of Medical

Licensure and Supervision