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

FILED

STATE OF OKLAHOMA EX REL. THE OKLAHOMA BOARD OF MEDICAL LICENSURE AND SUPERVISION,	OKLAHOM	3 - 7 2003  A STATE BOARD OF  NSURE & SUPERVISION
Plaintiff	)	
v.	) Case No. 03-0	1-2596
	)	
NONYELU ARIZE CHUKWUOGO, M.D.,	)	
OKLAHOMA MEDICAL LICENSE NO. 20469,	)	
	)	
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, Nonyelu Arize Chukwuogo, M.D., Oklahoma medical license no. 20469, 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, Nonyelu Arize Chukwuogo, M.D., holds Oklahoma medical license no. 20469.
- 3. On or about February 19, 2002, the Louisiana State Board of Medical Examiners entered an order reprimanding and fining Defendant based upon a finding that Defendant was guilty of unprofessional conduct and patient abandonment.
  - 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 H day of February, 2003 at 8.30 am.

Respectfully submitted,

Elizabeth A. Scott, OBA #12470

Assistant Attorney General

State of Oklahoma

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