

IN AND BEFORE THE STATE BOARD OF MEDICAL EXAMINERS

STATE OF OKLAHOMA

STATE OF OKLAHOMA, ex rel, )  
STATE BOARD OF MEDICAL )  
EXAMINERS, )

Plaintiff, )  
)  
)

WAYNE G. HILL, )  
Limited Institutional Practice )  
Certificate No. 405, )

Defendant.

**RECEIVED**

APR 15 1985

STATE BOARD  
MEDICAL EXAMINERS

COMPLAINT

COMES NOW D.C. Mosshart, Inspector for the Oklahoma Board of Medical Examiners, being first duly sworn upon oath and states:

1 That Wayne G. Hill, holding Certificate of Limited Institutional Practice No. 405, is in violation of the Oklahoma Medical Practice Act, 59 O.S. 1981, §508, to-wit:

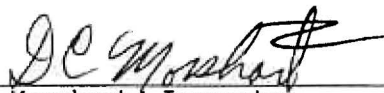
"Whenever any license or certificate has been procured or obtained by fraud or misrepresentation, or was issued by mistake; or if the diploma of graduation in medicine and surgery or any other credentials required as necessary to the ... certificate, were obtained by fraud or misrepresentation or issued by mistake ... it shall be the duty of the Board of medical Examiners of the State of Oklahoma to revoke such license or certificate in the same manner as is provided for in this Act for the revocation of license or certificate for unprofessional conduct."

2. That on or around March 21, 1985, the Oklahoma Board of Medical Examiners received from Dr. Juan A. Silva S., Dean of Medicine, Universidad Central del Este, Dominican Republic, information that the diploma submitted to the Board by the aforesaid Wayne G. Hill was false and had in fact been issued to another student, Maria Del Pilar Serrano Pernas, and that the aforesaid Wayne G. Hill was admitted to the aforesaid institution in September, 1976, but did not even complete one semester, and immediately withdrew.

3. That the diploma submitted by the Defendant, Wayne G Hill, was relied on by the Board in issuing the Defendant certificate authorizing him to do limited institutional practice.

WHEREFORE, Complainant prays this Board to conduct a hearing and upon proof of the allegations contained herein that such disciplinary action be taken by the Board as is authorized by

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D.C. Mosshart, Inspector  
State Board of Medical Examiners

Subscribed and sworn to before me this 15<sup>th</sup> day of April,

  
Notary Public

My commission expires:  
June 30, 1986