

IN AND BEFORE THE STATE BOARD OF MEDICAL EXAMINERS

STATE OF OKLAHOMA

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

Plaintiff,

v

HERIBERTO MARTINEZ ARNOLD, aka  
HERIBERTO MARTINEZ, M.D.,  
Limited Institutional Practice  
Certificate No. L-248,

Defendant

**RECEIVED**

FEB - 5 1985

**STATE BOARD  
MEDICAL EXAMINERS**

COMPLAINT


COMES NOW Phil McPherron, Inspector for the Oklahoma Board of Medical Examiners, being first duly sworn upon oath and states:

1. That Heriberto Martinez Arnold, also known as Heriberto Martinez, holding Certificate of Limited Institutional Practice No. L-248, is in violation of the Oklahoma Medical Practice Act 59 O.S. 1981, Section 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 January 23, 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 Heriberto Martinez was false and had in fact been issued to another student, Carlos Figueroa Otero, and that the aforesaid Heriberto Martinez was admitted to the aforesaid institution in 1976 but withdrew immediately and did not complete any of the subjects for which he registered.

3 That the diploma submitted by the Defendant Heriberto Martinez was relied on by the Board in issuing the Defendant certificate authorizing him to do limited institutional practice.

  
PHIL McPHERRON, Inspector  
State Board of Medical Examiners

Subscribed and sworn to before me this 5th day of  
February, 1985

  
Notary Public

My Commission expires:  
June 30, 1986