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

STATE OF OKLAHOMA)	
EX REL. THE OKLAHOMA BOARD)	NOV 18 2011
OF MEDICAL LICENSURE)	
AND SUPERVISION,)	OKLAHOMA STATE BOARD OF MEDICAL LICENSURE & SUPERVISION
Plaintiff,)	
v.	ý	Case No. 11-09-4422
)	
RAVINDER KURELLA, M.D.,)	
LICENSE NO. 22226,)	
)	
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, Ravinder Kurella, M.D., 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, Ravinder Kurella, M.D., holds Oklahoma license no. 22226 and at the time of the incidents in question, was in the Gastroenterology Fellowship Program at the University of Oklahoma Health Sciences Center in Oklahoma City, Oklahoma.

3. On or about September 12, 2011, Patient WWR was admitted to St. Anthony Hospital in Oklahoma City, Oklahoma after having an EGD for a lower esophageal impaction requiring removal. The treating physician, Misty Bogle, M.D., contacted Defendant late that evening and arranged for him to monitor the patient for possible complications and to meet with the patient to address any additional concerns.

4. The next morning, September 13, 2011, Dr. Bogle met with Patient WWR to examine him and follow-up on his treatment. At that time, Dr. Bogle reviewed the patient chart and read the examination record written by Defendant earlier that day, which included all normal components of a SOAP note including physical exam findings of the heart, lungs and abdomen. Dr. Bogle asked the patient if Defendant had answered all of his questions and the patient told her that he had never seen Defendant.

5. Dr. Bogle then left the patient's room, called Defendant and asked him if he had seen the patient. Defendant initially lied to Dr. Bogle and told her that he had seen the patient. Upon further questioning by Dr. Bogle, Defendant admitted that he in fact had not seen the patient.

6. When questioned by Board investigators, Defendant admitted that with respect to this patient, he filled out the patient record in advance with "expected results" with the intent to go back later and examine the patient. However, in this case, he never went back to examine the patient.

7. Defendant further admitted to Board investigators that in other instances involving other patients, he has input patient information into the patient chart prior to examining the patient.

8. As a result of his falsification of Patient WWR's patient record, The University of Oklahoma took administrative action against him for his unprofessional conduct whereby Defendant's fellowship training program was extended for an additional three (3) months, along with additional monitoring and education on medical fraud and documentation. The Program Director then reported Defendant's fraud and unprofessional conduct to the Board.

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

A. Engaged in 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. 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).

C. Engaged in the use of any false, fraudulent, or deceptive statement in any document connected with the practice of medicine and surgery in violation of OAC 435:10-7-4(19).

D. Failed to maintain an office record for each patient which accurately reflects the evaluation, treatment, and medical necessity of treatment of the patient in violation of 59 O.S. §509(18) and 435:10-7-4(41).

Conclusion

WHEREFORE, the Plaintiff respectfully 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 suspension or revocation and any other appropriate action with respect to Defendant's medical license, and an assessment of costs and attorney's fees incurred in this action as provided by law.

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Respectfully submitted,

Elizabeth A. Scott (OBA #12470) Assistant Attorney General State of Oklahoma 101 N.E. 51st Street Oklahoma City, OK 73105 Attorney for the Plaintiff