

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

FILED

AUG 08 2002

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

STATE OF OKLAHOMA)
EX REL. THE OKLAHOMA BOARD)
OF MEDICAL LICENSURE)
AND SUPERVISION,)

Plaintiff,)

v.)

SREEDHAR REDDY TALLAPUREDDY, M.D.,)
SPECIAL TRAINING LICENSE NO. 22390,)

Defendant.)

Case No.02-03-2470

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, Sreedhar Reddy Tallapureddy, 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, Sreedhar Reddy Tallapureddy, M.D., holds Oklahoma special training license no. 22390.
3. From July 1, 2001 through November 30, 2001, Defendant was a first year resident in the Department of Family Practice at the University of Oklahoma Health Sciences Center.
4. On or about September 7, 2001, Defendant was placed on a six (6) month period of probation for failing to meet the performance standards of the training program. Defendant was advised that if he received any below average or worse evaluations during the period of probation, he could be terminated from the program.
5. Defendant was then notified on or about November 1, 2001 that he was dismissed from the University of Oklahoma College of Medicine Department of Family Practice Residency Program effective November 30, 2001 due to his failure to meet the standards of the residency program. Specifically, Defendant was noted to be unable to make critical judgments, he did not

follow through on his responsibilities, he had difficulties obtaining an accurate history, he had a knowledge deficit, he was observed falling asleep at nurses' stations during rounds, and had asked another resident to write him a prescription for Valium. During his period of probation, Defendant received two (2) failing evaluations.

6. During the time Defendant was a first year resident, Defendant was the acting physician on numerous procedures at which time patient care was jeopardized due to Defendant's acts of negligence or his inability to perform the required procedures with appropriate skill and knowledge.

7. 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(9) and OAC 435:10-7-4(11).

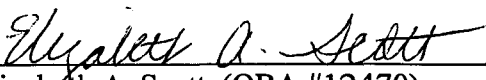
B. Engaged in gross or repeated negligence in the practice of medicine and surgery in violation of OAC 435:10-7-4(15).

C. Engaged in practice or other behavior which demonstrates an incapacity or incompetence to practice medicine and surgery in violation of OAC 435:10-7-4(18).

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.

Respectfully submitted,



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Attorney for the Plaintiff