

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

FILED

JUN 14 2013

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

STATE OF OKLAHOMA)
EX REL. THE OKLAHOMA BOARD)
OF MEDICAL LICENSURE)
AND SUPERVISION,)
)
Plaintiff)
)
v.)
)
FARSHID ADAM-AMIR ZANDI, M.D.,)
LICENSE NO. 22558)
)
Defendant.)

Case No. 12-10-4620

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, Scott Randall Sullivan, Special Prosecutor for the Board, and for its Complaint against the Defendant, Farshid Aadm-Amir Zandi, M.D., Oklahoma license no. 22558, 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, Farshid Adam-Amir Zandi, M.D., holds Oklahoma license no. 22558.

Fraudulent License Renewal

3. On May 21, 2004 Defendant submitted his Application for License Renewal. On his Application for Renewal Defendant was asked the following questions: "Have you had any adverse judgment, settlement, or award against you arising from a professional liability claim?" and "Have you been reported to the National Practitioner Data Bank (NPDB) or to the Healthcare Integrity and Protection Data Bank (HIPDB)?" In response to both questions Defendant answered "NO". In fact, on January 1, 2004, \$100,000 was paid on behalf of the Defendant in a case for the death of a 70 year-old man for medication causing excessive bleeding and resulting in death.

5. On June 10, 2012 Defendant submitted his Application for License Renewal. On his Application for Renewal Defendant was asked the following questions: "Have you had any adverse judgment, settlement, or award against you arising from a professional liability claim?"

and “Have you been reported to the National Practitioner Data Bank (NPDB) or to the Healthcare Integrity and Protection Data Bank (HIPDB)?” In response to both questions Defendant answered “NO”. In fact, on July 25, 2011, \$181,250 was paid on behalf of the Defendant in a case for failure to discover an underlying eye condition in a 60-year-old male causing irreversible vision loss and on December 8, 2011, \$100,000 was paid on behalf of the Defendant in a case for his role in administering blood products to a patient with TTP, resulting in the death of a 45-year-old female.

7. Further, Defendant failed to update his practice information on his 2004 and 2012 applications.

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

A. Engaged in fraud or misrepresentation in applying for or procuring a medical license or in connection with applying for or procuring periodic reregistration of a medical license in violation of *Oklahoma Administrative Code* section 435:10-7-4(8).

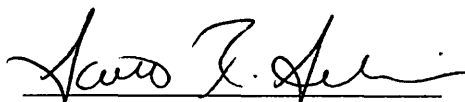
B. Engaged in the use of any false, fraudulent, or deceptive statement in any document connected with the practice of medicine and surgery in violation of OAC 435:10-7-4(19).

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 14th day of June, 2013.

Respectfully submitted,



Scott Randall Sullivan, OBA #11179
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION
101 N.E. 51st Street
Oklahoma City, OK 73105

Attorney for Plaintiff