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

FILED

JUL 25 2013

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

STATE OF OKLAHOMA EX REL. THE OKLAHOMA BOARD OF MEDICAL LICENSURE AND SUPERVISION,	)	
Plaintiff	)	
v.	)	**Case No. 12-10-4620**
FARSHID ADAM-AMIR ZANDI, M.D., LICENSE NO. 22558	)	
Defendant.	)	

ORDER ACCEPTING
VOLUNTARY SUBMITTAL TO JURISDICTION

Plaintiff, the State of Oklahoma, ex rel. the Oklahoma State Board of Medical Licensure and Supervision ("Board"), by and through its attorney, Scott Randall Sullivan, Special Prosecutor, for the State of Oklahoma and the staff of the Board, as represented by the Secretary of the Board, Gerald C. Zumwalt, M.D., and the Executive Director of the Board, Lyle Kelsey, and the Defendant, Farshid Adam-Amir Zandi, M.D., Oklahoma license no. MD22558 who appears in person, offer this Agreement effective September 12, 2013, for acceptance by the Board *en banc* pursuant to *Oklahoma Administrative Code* Rule 435:5-1-5.1.

By voluntarily submitting to jurisdiction and entering into this Order, Defendant pleads guilty to the allegations in the Complaint and Citation filed herein on June 14, 2013, and further acknowledges that a hearing before the Board would result in some sanction under the Oklahoma Allopathic Medical and Surgical Licensure and Supervision Act ("Act").

Defendant, Farshid Adam-Amir Zandi, M.D., states that he is of sound mind and is not under the influence of, or impaired by, any medication or drug and that he fully recognizes his right to appear before the Board for an evidentiary hearing on the allegations made against him. Defendant hereby voluntarily waives his right to a full hearing, submits to the jurisdiction of the Board and agrees to abide by the terms and conditions of this Order. Defendant acknowledges that he has read and understands the terms and conditions stated herein, and that this Agreement has been reviewed and discussed with him and his legal counsel, if any.

Agreements and Stipulations

Plaintiff, Defendant and the Board staff stipulate and agree 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.

4. 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.

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

Conclusions of Law

6. 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 Rule 435:10-7-4(8); and

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 *Oklahoma Administrative* Code Rule 435:10-7-4(19).

Order

IT IS THEREFORE ORDERED by the Oklahoma State Board of Medical Licensure and Supervision as follows:

1. The Board *en banc* hereby adopts the agreement of the parties in his Voluntary Submittal to Jurisdiction;

2. Pursuant to the parties' voluntary agreement and submittal to jurisdiction, Farshid Adam-Amir Zandi, M.D., Oklahoma license no. MD 22558, is hereby **FORMALLY REPRIMANDED**; and

3. Defendant shall pay an **ADMINISTRATIVE FINE** in the amount of **$2,500**. Said Administrative Fine shall be paid in full **no later than one (1) year** from the date of this Order.

Dated this 25th day of July, 2013.

G. David Casper, M.D., President
Oklahoma State Board of Medical
Licensure and Supervision

Farshid Adam-Amir Zandi, MD
License No. 22558

Gerald C. Zumwalt, M.D., Secretary
Oklahoma State Board Of Medical
Licensure And Supervision

Scott Randall Sullivan, OBA #11179
101 N.E. 51st Street
Oklahoma City, OK 73105

Attorney for Oklahoma State Board of
Medical Licensure and Supervision

CERTIFICATE OF MAILING

This is to certify that on this 26th day of July, 2013, a true and correct copy of this Order was mailed, postage prepaid, to Farshid Adam-Amir Zandi, M.D., P.O. Box 4769, Tulsa, OK 74159

Barbara J. Smith, Legal Assistant