

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

FILED

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

Plaintiff,

v.

SAMEENA KHAN, M.D.,
LICENSE NO. 23081,

Defendant.

APR 13 2006

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 05-10-3007

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, Sameena Khan, 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, Sameena Khan, M.D., holds Oklahoma license no. 23081 and is a vitreoretinal surgeon in Tulsa, Oklahoma.

3. On or about August 10, 2005, Defendant was summarily suspended by St. John Medical Center in Tulsa, Oklahoma based upon her actions during a vitrectomy performed on Patient TBM. Concerns were also raised regarding her excessive operating time and lack of acceptable surgical ability for Patients EWM (two separate cases), DMM, BSM, HLM, KBM, JTM, DWM, HMM, RBM, OCM, ELM and JMM.

4. On or about August 30, 2005, Defendant met with medical staff representatives, at which time they determined that her summary suspension would continue pending review of her cases by an outside reviewer.

5. On or about September 8, 2005, the medical staff representatives received the report from the outside reviewer and elected to uphold the summary suspension of Defendant's

privileges at St. John Medical Center. Defendant was advised that this recommendation would be forwarded to the Medical Executive Committee.

6. On or about September 9, 2005, Defendant resigned from the medical staff of St. John Medical Center.

7. With respect to the cases set forth above, Defendant was the acting vitreoretinal surgeon for numerous procedures at which time patient care was jeopardized due to Defendant's acts of negligence or her inability to perform the required procedures with appropriate skill or knowledge.

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

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).

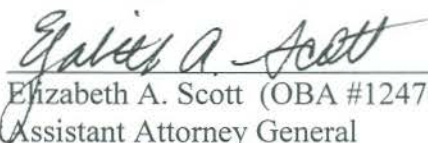
B. Engaged in gross or repeated negligence in the practice of medicine and surgery in violation of OAC 435:10-7-4(15).

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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