

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

STATE OF OKLAHOMA, *ex rel.*)
OKLAHOMA STATE BOARD)
OF MEDICAL LICENSURE)
AND SUPERVISION,)
)
Plaintiff,)
)
v.)
)
ABOLGHASEM REZAEI, M.D.,)
LICENSE NO. MD 23655,)
)
Defendant.)

FILED

FEB 16 2022

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 9-12-3897

MOTION TO ENFORCE BOARD ORDER

Pursuant to 59 O.S., 2011 § 513(B), the State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision (“Board”), by and through its attorney Joseph L. Ashbaker, Assistant Attorney General for the State of Oklahoma (“State”), requests this Court enter an Order finding Abolghasem Rezaei, M.D. (“Defendant”) has failed to comply with a previously issued Board Order, and order appropriate sanctions and remedies for those violations. In support thereof, the State submits the following brief:

I. VIOLATIONS

Defendant was granted a reinstatement of his medical license under terms of agreement on or about December 10, 2020. That Order incorporated by reference the Agreement for Licensure After Voluntary Submittal to Jurisdiction signed May 4, 2017. That Order remains in full force and effect and has not been changed or modified except with respect to the length of time Defendant can prescribe Controlled Dangerous Substances.

Since the December 10, 2020 Board Order was entered, Defendant has violated terms and conditions as follows:

Paragraph D (Specific Terms): Defendant will sign a three five (5) year contract with Oklahoma Health Professionals Program (“OHPP”) and abide by all recommendations.

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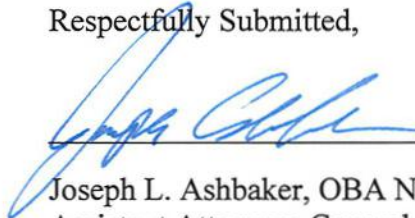
- Defendant signed an agreement with OHPP to submit to four (4) hair follicle drug tests per year. OHPP staff arranged a hair follicle drug test for Defendant on January 19, 2022 at Affinity. Defendant did not show up for that test. OHPP then contacted Defendant by email on February 2, 2022 asking for an explanation. Defendant failed to respond to that

email. OHPP staff then sent Defendant a letter on February 9, 2022 informing him that he had missed a scheduled drug test, had failed to respond to OHPP's communications and that Medical Board staff would be notified.

II. CONCLUSION

It is requested that this Honorable Board find, by clear and convincing evidence, that Defendant has willfully violated the terms and conditions of his Agreement and order appropriate sanctions and remedies in accordance with 59 O.S. § 513(B) and 59 O.S. § 509.1.

Respectfully Submitted,



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Certificate of Service

This is to certify that on the 17th day of February, 2022, a true and correct copy of the foregoing motion was transmitted by U.S. certified mail, to the following and by process server to Defendant:

U.S. Certified Mail
Abolghasem Rezaei, M.D.
4121 West Gore Blvd.
Lawton, OK 73505-6336
Defendant pro se



Nancy Thiemann, Legal Assistant