

**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.)
)
BALI REDDY SODAM, M.D.)
LICENSE NO. MD 24723,)
)
Defendant.)

FILED

FEB 07 2022

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 21-11-6060

VERIFIED COMPLAINT

The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision (“Board”), for its Verified Complaint against Bali Reddy Sodam, M.D. (“Defendant”), alleges and states as follows:

I. JURISDICTION

1. The Board has jurisdiction over the subject matter and 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. 59 O.S. § 480, *et seq.* and Okla. Admin. Code 435:5-1-1 *et seq.*
2. In Oklahoma, Defendant holds medical license no. 24723.
3. The acts and omissions complained of herein were made while Defendant was licensed to practice medicine by the State of Oklahoma.

II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

4. This action arises out of complaints related to conduct by Defendant, as follows:
 - a. On or about October 26, 2021, the Board received a complaint involving sexual misconduct wherein a former patient, M.A., was the victim. The complaint alleged the Defendant made inappropriate comments to the patient, touched the patient in a sexual manner, and exposed himself to and further assaulted the patient.

- b. On or about November 5, 2021, a second complaint was received alleging the Defendant had sexually, physically, and verbally harassed employees of a contract provider of acute dialysis services to Comanche County Memorial Hospital while the Defendant provided patient services there.
- c. A complaint was received by an administrator at Comanche County Memorial Hospital regarding complaints of sexual harassment against the Defendant received by the hospital. It was further reported that Defendant has been placed on a leave of absence from said hospital related to said allegations.

III. VIOLATIONS

5. Based on the foregoing, Defendant is guilty of unprofessional conduct as follows:
 - a. Engaging in physical conduct with a patient which is sexual in nature, or in any verbal behavior which is seductive or sexually demeaning to a patient, in violation of Okla. Stat. tit. 59 §509(17).
 - b. Conduct likely to harm the public, in violation of Okla. Admin. Code § 435:10-7-4(11).
 - c. Dishonorable or immoral conduct which is likely to deceive, defraud, or harm the public, in violation of Okla. Stat. tit. 59 §509(8).
 - d. Commission of any act of sexual abuse, misconduct, or exploitation related or unrelated to the licensee's practice of medicine and surgery, in violation of Okla. Admin. Code § 435:10-7-4(23).
 - e. Abuse of a physician's position of trust by coercion, manipulation or fraudulent representation in the doctor-patient relationship, in violation of Okla. Admin. Code § 435:10-7-4(44).
 - f. Engaging in predatory sexual behavior, in violation of Okla. Admin. Code § 435:10-7-4(45).

IV. CONCLUSION

Given the foregoing, the undersigned respectfully requests 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 professional license, including an assessment of costs and attorney's fees incurred in this action as provided by law.

Respectfully submitted,



Amanda R. Everett, OBA # 30107
Assistant Attorney General
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VERIFICATION

I, Larry Rhodes, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

1. I have read the above Complaint regarding **BALI REDDY SODAM, MD**, and,
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.



Larry Rhodes, OSBMLS Investigator
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Executed this 7th day of FEBRUARY, 2022, in Oklahoma County, State of Oklahoma.