

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.)
)
MOHAMAD KHAWANDANAH, M.D.,)
LICENSE NO. 26374,)
)
Defendant.)

JAN 28 2011

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 10-08-4065

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, Mohamad Khawandanah, 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, Mohamad Khawandanah, M.D., holds Oklahoma license no. 26374 and is a resident in the Internal Medicine Residency Program at the University of Oklahoma Health Sciences Center in Oklahoma City, Oklahoma.

3. On or about August 25, 2010, Defendant contacted a prostitute and arranged for a "date". Defendant found the prostitute from an escort service ad on an online service called "Backpage.com". The prostitute was in fact an undercover Oklahoma City police officer.

4. Defendant met the undercover officer at the Oak Tree Inn and Suites on S. Meridian in Oklahoma City, Oklahoma. He offered to pay her \$80.00 for sexual acts. He then removed all of his clothing, at which time he was arrested by other Oklahoma City police officers.

5. On or about September 10, 2010, Defendant was charged with **PROSTITUTION-OFFERING TO ENGAGE IN AN ACT OF LEWDNESS**, a

Misdemeanor, Case No. CM-2010-3794, in the District Court of Oklahoma County, State of Oklahoma.

6. On or about September 29, 2010, Defendant plead **GUILTY** to the amended charge of **OUTRAGING PUBLIC DECENCY**. He received a deferred sentence to include supervision by the District Attorney and imposition of a fine and court costs.

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

A. Procured, aided or abetted a criminal operation in violation of 59 O.S. §509(1).

B. Engaged in dishonorable or immoral 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).

C. Violated any provision of the medical practice act or the rules and regulations of the Board or of an action, stipulation, or agreement of the Board in violation of 59 O.S. §509(13) and OAC 435:10-7-4(39).

D. Confessed to a crime involving violation of the laws of this state in violation of 59 O.S. §509(7).

E. Committed any act of sexual abuse, misconduct, or exploitation related or unrelated to the licensee's practice of medicine and surgery in violation of OAC 435:10-7-4(23).

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,

Elizabeth A. Scott

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