

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

**FILED**

OCT - 6 2022

OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE & SUPERVISION

STATE OF OKLAHOMA, *ex rel.* )  
OKLAHOMA STATE BOARD )  
OF MEDICAL LICENSURE )  
AND SUPERVISION, )

Plaintiff, )

v. )

Case No. 22-06-6131

FARHAAD RAHMAN RIYAZ, M.D., )  
LICENSE NO. MDC 37270, )

Defendant. )

**VERIFIED COMPLAINT**

The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision (“Board”), for its Verified Complaint against Farhaad Rahman Riyaz, 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. 37270, issued 11/09/2020 pursuant to the Interstate Medical Licensure Compact (“IMLC”), with his State of Principal License being Illinois. Defendant holds or has held licenses to practice medicine in more than forty (40) jurisdictions, many of which were also obtained via the IMLC. However, as of September 9, 2022, the jurisdictions of Alabama, Arizona, Colorado, District of Columbia, Maryland, Massachusetts, Michigan, New York, Tennessee, Virginia, Vermont and Wyoming have taken action against the Defendant’s license in each respective venue.
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 criminal and unprofessional conduct by the Defendant resulting in suspension and/or revocation of Defendant’s medical license in at least ten (12) jurisdictions as of the date this Complaint is filed.

5. On December 13, 2021 Defendant pled guilty to one count of Mail Fraud, in violation of 18 U.S.C. § 1341, in the United States District Court for the Eastern District of Virginia, Case No. 1:21 CR00264-001. Violation of 18 U.S.C. § 1341 is an offense classified as a Class C felony under federal law. *See* 18 U.S.C. § 3559(a)(3). Defendant was subsequently sentenced to a term of imprisonment of one (1) day followed by three (3) years supervised release, including six (6) months of home confinement, and additionally ordered to pay \$312,964.38 in restitution, as well as \$21,100 in fines and assessments.
6. Defendant subsequently reported his guilty plea to the above described criminal offense to the Board on December 20, 2021.
7. Although Defendant does not reside nor physically practice medicine in Oklahoma, he has reported that the “majority” of his “current practice in Oklahoma involves telemedicine, including treating patients in rural areas with poor access to dermatologic care.”
8. As of September 9, 2022, twelve (12) known jurisdictions have restricted Defendant’s license to practice medicine, ranging from agreements not to practice (Arizona, Colorado, Massachusetts) to suspension (Alabama, Maryland, Michigan, New York, Tennessee, Virginia, Wyoming).

### III. VIOLATIONS

9. Based on the foregoing, Defendant is guilty of unprofessional conduct as follows:
  - a. Conviction or confession of, or plea of guilty, nolo contendere, no context or Alford plea to a felony or any offense involving moral turpitude, in violation of 59 O.S. § 509(5) and Okla. Admin. Code § 435:10-7-4(10).
  - b. Dishonorable or immoral conduct which is likely to deceive, defraud, or harm the public, in violation of 59 O.S. § 509(8) and Okla. Admin. Code § 435:10-7-4(11).
  - c. The violation, or attempted violation, direct or indirect, of any of the provisions of the Oklahoma Allopathic Medical and Surgical Licensure and Supervision Act, either as a principal, accessory or accomplice, in violation of 59 O.S. § 509(13).
  - d. Disciplinary action of another state or jurisdiction against a license or other authorization to practice medicine and surgery based upon acts of conduct by the licensee similar to acts or conduct that would constitute grounds for action as defined in this section, a certified copy of the record of the action taken by the other state or jurisdiction being conclusive evidence thereof, in violation of Okla. Admin. Code § 435:10-7-4(31).
  - e. Violation of any provision(s) of the medical practice act or the rules and regulations of the Board or of any action, stipulation, or agreement of the Board in violation of Okla. Admin. Code § 435:10-7-4(39).
10. Additionally, while the Board is entitled to take disciplinary action at its discretion for the above described unprofessional conduct, the Board is obligated to revoke Defendant’s

10. Additionally, while the Board is entitled to take disciplinary action at its discretion for the above described unprofessional conduct, the Board is obligated to revoke Defendant's license to practice medicine for Defendant's felony conviction, pursuant to 59 O.S. § 513(A)(3) and Okla. Admin. Code § 435:5-1-5.2.(b).

## V. 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,



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**VERIFICATION**

I, Robbin Roberts, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

1. I have read the above Complaint regarding the Defendant, Farhaad Rahman Riyaz, MDC; and
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.

  
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Robbin Roberts, Investigator  
OKLAHOMA STATE BOARD OF MEDICAL  
LICENSURE AND SUPERVISION

Date: 10-5-22