

4. On or about April 30, 2024, Defendant agreed to a consent order with and before the Division of Professional Regulation of the Department of Financial and Professional Regulation for the State of Illinois regarding his license to practice as a physician and surgeon in the state. Per the consent agreement, Defendant was placed on indefinite probation for a minimum of four (4) years wherein he is subject to numerous, stringent terms and conditions. Defendant subsequently reported the foregoing disciplinary action to the Board on or about May 6, 2024.

III. VIOLATIONS

5. Based on the foregoing, Defendant is guilty of unprofessional conduct as follows:
 - a. Fraud or misrepresentation in applying for or procuring a medical license, in violation of Okla. Admin. Code § 435:10-7-4(8).
 - b. Disciplinary action of another state or jurisdiction against a license or other authorization to practice medicine and surgery based upon acts or conduct by the licensee similar to acts or conduct that would constitute grounds for action as defined in Okla. Admin. Code § 435:10-7-4, in violation of Okla. Admin. Code § 435:10-7-4(31).
 - c. Failure to report surrender of membership on any medical staff or in any medical or professional association or society while under disciplinary investigation by any of those authorities or bodies for acts or conduct similar to acts or conduct that would constitute grounds for action as defined in this section, in violation of Okla. Admin. Code § 435:10-7-4(33).

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,



Alex A. Pedraza, OBA No. 33584
Assistant Attorney General
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION
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Oklahoma City, Oklahoma 73105
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Email: Alex.Pedraza@oag.ok.gov

VERIFICATION

I, Jim Stokes, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

1. I have read the above Complaint regarding Ian Coelho, M.D.; and
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.



Jim Stokes
Interim Director of Investigations
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Date: 7/10/2024

County, State of Execution