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

STATE OF OKLAHOMA, ex rel.	FILED
OKLAHOMA STATE BOARD	
OF MEDICAL LICENSURE	JUL 1 0 2024
AND SUPERVISION,	
Plaintiff,	OKLAHOMA STATE BOARD OF MEDICAL LICENSURE & SUPERVISION
v.	Case No. 24-05-6342
IAN COELHO, M.D.,	) )
LICENSE NO. MD 41964,	
Defendant.	) )

### VERIFIED COMPLAINT

The State of Oklahoma, ex rel. Oklahoma State Board of Medical Licensure and Supervision ("Board"), for its Verified Complaint against Aja, 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.
- Defendant holds medical license No. 41964, issued 10/25/2023 by the Oklahoma Board of Medical Licensure and Supervision. The acts and/or omissions complained of herein occurred while Defendant was licensed, or was applying for licensure which was subsequently obtained, to practice medicine by the State of Oklahoma.

#### II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

This action arises out of unprofessional conduct by Defendant as detailed herein. Defendant submitted his Application for Oklahoma Medical Doctor License form to the Board on June 29, 2023, in which he indicated that he had never been the subject of an investigation, probation or disciplinary action by a hospital, clinic, practice group, training program or professional school. Defendant additionally represented in his application that he had never surrendered hospital staff privileges while under investigation. At the time Defendant submitted his application Defendant knew or should have known that he had previously been under investigation by DuPage Medical Group before and/or following his resignation from the same in May of 2022.

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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# **VERIFICATION**

I	, Jim Stokes,	under p	enalty	of perjury,	under th	he laws	of the	State of	f 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.

on toho	Date: 7/10/2024	
Jim Stokes		
Interim Director of Investigations		
OKLAHOMA STATE BOARD OF MEDICAL		
LICENSURE AND SUPERVISION		
	County, State of Execution	