

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.

ABEL J. SANDS, M.D.
Medical License No. 5560

) CASE NO. 93-12-1569
)

Defendant

COMPLAINT

COMES NOW Tom Sosbee, Investigator for the Oklahoma State Board of Medical Licensure and Supervision, being first duly sworn upon oath and states:

1. That Abel J. Sands, M.D., holding Oklahoma Medical License No. 5560, is in violation of the Oklahoma Medical Practice Act, 59 O.S. Supp. 1993, Sec. 509, Paragraph 9, to-wit:

"9. Dishonorable or immoral conduct which is likely to deceive or defraud the public."

2. That on or around December 2, 1991, and again on or around February 20, 1992, Defendant did represent to staff members of the Oklahoma Board of Medical Licensure and Supervision that he was obtaining necessary continuing medical education by attending various seminars and meetings at Midwest City Hospital and other places.

3. That upon request Defendant submitted announcements of continuing medical education meetings and represented that he had attended those CME programs at Midwest City Regional Hospital, and with Pratt/Pfizer Pharmaceuticals and with Dyna Marketing Resources.

4. That representatives of Midwest City Regional Hospital Pratt/Pfizer Pharmaceuticals and Dyna Marketing Resources indicate that Defendant did not attend any continuing medical education at the programs and dates and times the Defendant claimed.

5. That Defendant's acts and omissions herein constitute dishonorable or immoral conduct likely to deceive or defraud the public and that Defendant is perpetuating significant harm to public health, safety and welfare by continuing the acts and omissions set forth above.

WHEREFORE, Complainant prays this Board to conduct a hearing and upon proof of the allegations contained herein that such disciplinary action be taken by the Board as is authorized by law.

Tom Sosbee
TOM SOSBEE, Investigator
Oklahoma State Board of
Medical Licensure and Supervision

Subscribed and sworn to before me this 4th day of
January, 1994.

Janet L Owens
Notary Public

My Commission expires:
12-20-96