

- a. § 1731(b)(3) in that his conduct was dishonorable and unethical and likely to harm members of the public, co-workers, and patients;
- b. § 1731(b)(11) in that he engaged in sexual misconduct; and
- c. § 1731(b)(17) in that he violated provisions of Chapter 17 and Board Regulation 15.1.10 (now Regulation 8.1.16) as his actions tend to bring discredit upon the medical profession.

COUNT II

8. Between February 12, 2013 and March 13, 2013, while performing medical or surgical abortions on five patients, Respondent engaged in multiple acts of incompetence and negligence including but not limited to:

- a. over sedating patients;
- b. performing unnecessary suction procedures;
- c. failing to properly assess a patient's airway, lungs, and heart prior to administering sedation;
- d. failing to properly assess patients;
- e. failing to properly administer oxygen;
- f. failing to adequately document procedures and results of procedures in patient charts;
- g. failing to consider alternative treatments;
- h. causing at least one perforation during surgery;
- i. failing to properly supervise resident physicians during procedures; and
- j. failing to act with due competence and diligence to avoid unnecessary complications resulting in patients requiring emergency hospital treatment.

9. In engaging in multiple acts of unprofessional, incompetent and negligent conduct, Respondent violated the following provisions of Title 24:

a. § 1731(b)(3) in that his conduct was dishonorable and unethical and likely to harm members of the public including his patient;

b. § 1731(b)(10) in that he failed to provide adequate supervision to an individual working under his supervision;

c. § 1731(b)(11) in that his treatment of his patients constituted incompetence and/or a pattern of negligence in the practice of medicine; and

d. § 1731(b)(17) in that he violated provisions of Chapter 17 and Board Regulations 15.1.10 (now Regulation 8.1.16) and 21 (now Regulation 11).

10. Based on Respondent's serious and repeated acts of misconduct, unprofessional conduct, incompetence and negligence and that Respondent has active medical licenses in Delaware and Pennsylvania, Respondent presents a clear and immediate danger to the public.

WHEREFORE, pursuant to 29 *Del.C.* §8735 and 24 *Del.C.* Chapter 17, the State of Delaware respectfully requests that the Board of Medical Licensure and Discipline:

a. Set a time for a hearing on the allegations set forth above;

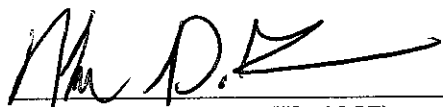
b. Serve Respondent with a copy of the Complaint;

c. Find Respondent guilty of violating the provisions of 24 *Del.C.* §1731 as alleged herein; and,

d. Permanently revoke Respondent's license to practice medicine or take such other action as deemed appropriate by the Board.

[SIGNATURES APPEAR ON NEXT PAGE]

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Dated: _____

Dated: May 30, 2013