

IN THE MATTER OF THE) (BEFORE THE
) (
APPLICATION FOR LICENSURE OF) (
) (TEXAS STATE BOARD
CHRIS C. TOKUNAGA, M.D.,) (
) (
APPLICANT) (OF MEDICAL EXAMINERS

PETITION

Pursuant to Subchapter C, Licensure, Section 3.01(h) of the Medical Practice Act, article 4495b, Tex. Rev. Civ. Stat. Ann. (the "Act"), the Texas State Board of Medical Examiners (the "Board") acting on and through the authority vested in the Board by the Act, hereby issues its Petition alleging as follows:

I

Chris C. Tokunaga, M.D., (the "Applicant") has filed his Application for Licensure, dated August 16, 1989, as received by the Board on August 24, 1989. The Applicant filed supplemental information which was incorporated into the original application.

II

The Applicant appeared before the Reciprocity Committee of the Board on August 22, 1991, when it considered his application for licensure by reciprocal endorsement. The Reciprocity Committee found the Applicant ineligible for licensure by reciprocal endorsement in Texas pursuant to Section 3.03(g) of the Act and Board Rules 163.2(b)(2) and 163.2(b)(6)(H). The Applicant was notified of his ineligibility by letter dated August 29, 1991. The Applicant timely requested an appellate hearing by his letter dated September 20, 1991.

III

The Board alleges that the Applicant, Chris C. Tokunaga, M.D., is ineligible for licensure by reciprocal endorsement in Texas and would show the following in support thereof:

COUNT I

Applicant's clinical clerkships at Norwegian American Hospital, Chicago, Illinois, were not carried out in a hospital with a program

in graduate medical education approved by the Accreditation Council for Graduate Medical Education, the American Osteopathic Association or the Board in the same subjects as the clerkships as required by Board Rule 163.2(b)(6)(H).

COUNT II


Applicant does not possess the requisite qualifications to provide the same standard of medical care as provided by a licensed physician in this state as required by Section 3.03(f) of the Act.

IV

The Applicant's violation of Sections 3.03(f) and 3.03(g) of the Act and Board Rule 163.2(b)(6)(H) are grounds for the Board to deny licensure by reciprocal endorsement to the Applicant to practice medicine in the State of Texas, in accordance with the provision of the laws of the State of Texas.

WHEREFORE, PREMISES CONSIDERED, it is respectfully prayed that, upon hearing, the application for licensure by reciprocal endorsement of Chris C. Tokunaga, M.D. be denied.

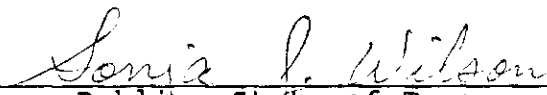
Respectfully submitted,



Antonio A. Cobos
Staff Attorney

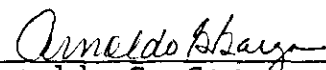
SUBSCRIBED AND SWORN to before me by the said Antonio A. Cobos, this the 13th day of January, 1992.





Notary Public, State of Texas

Filed with the Texas State Board of Medical Examiners on this the 13th day of January, 1992.



Arnoldo G. Garza
Director of Hearings
Texas State Board of Medical
Examiners

TC.AO 8.41/3