FILEB

# BEFORE THE BOARD OF HEALING ARTS OF THE STATE OF KANSAS

APR 2 4 1996

KANSAS STATE BOARD OF HEALING ARTS

IN THE MATTER OF

LESLIE F. PAGE, D.O.

Kansas License Number 05-20200

)

Case # 93-00149 94-00118

## PETITION TO REVOKE, SUSPEND, OR OTHERWISE LIMIT LICENSURE

COMES NOW, this 24th day of April, 1996, the Kansas State Board of Healing Arts ("Board") by and through its Disciplinary Counsel, Kevin K.

LaChance ("Petitioner"), and initiates these proceedings under the provisions of K.S.A. 65-2851a and K.S.A. 77-501 et seq. and for its cause of action alleges and states:

- 1. The Board has received certain information, has investigated such information, and has determined that there are reasonable grounds to believe that Leslie F. Page, D.O.("Licensee") has committed an act or acts in violation of the Kansas Healing Arts Act, K.S.A. 65-2801 et seq.; K.S.A. 65-2836.
- 2. Licensee's last known mailing address to the Board is P.O. Box 4446, Wichita, KS 67204-0446.
- 3. Licensee is or has been entitled to engage in the practice of osteopathic medicine and surgery in the State of Kansas, having been issued license number 05-20200 on August 1, 1983. At all times relevant to the allegations set forth below, Licensee has held a current license to engage in the practice of osteopathic medicine and surgery in the State of Kansas, having last renewed his license on May 23, 1995.
- 4. Since issuance of license, while engaged in a regulated profession as an osteopathic medical doctor authorized to engage in the

practice of the healing arts in the state of Kansas pursuant to K.S.A. 65-2801 et seq., Licensee did commit the following act(s), to wit:

#### COUNT 1

Licensee has committed acts or conduct which violate the provisions of K.S.A. 65-2836(b), professional incompetency, as further defined by K.S.A. 65-2837(a)(2), in that Licensee has committed repeated instances involving failure to adhere to the applicable standard of care to a degree which constitutes ordinary negligence, as determined by the Board.

#### COUNT 2

Licensee has committed acts or conduct which violate the provisions of K.S.A. 65-2836(b), professional incompetency, as further defined by K.S.A. 65-2837(a)(1), in that Licensee has committed one or more instances involving failure to adhere to the applicable standard of care to a degree which constitutes gross negligence, as determined by the Board.

## COUNT 3

Licensee has committed acts or conduct which violate the provisions of K.S.A. 65-2836(b), professional incompetency, as further defined by K.S.A. 65-2837(a)(3), in that Licensee has committed a pattern or practice or other behavior which demonstrates a manifest incapacity or incompetence to practice medicine.

## COUNT 4

Licensee has committed acts or conduct which violate the provisions of K.S.A. 65-2836(s), in that sanctions or disciplinary actions have been taken against the Licensee by a peer review committee and/or a health care facility for acts or conduct similar to acts or conduct which would constitute grounds for disciplinary action under this section.

#### COUNT 5

Licensee has committed acts or conduct which violate the provisions of K.S.A. 65-2836(u), in that Licensee agreed to a limitation to or restriction of privileges at any medical care facility or has surrendered the licensee's membership on any professional staff while under investigation for acts or conduct similar to acts or conduct which would constitute grounds for disciplinary action under this section.

WHEREFORE, Petitioner prays the Board serve the Licensee with a copy of this Petition as provided by law. Petitioner further prays that upon evidence presented at the hearing, the Board make findings of fact and conclusions of law that Licensee committed these acts in violation of the Kansas Healing Arts Act and that the Board take such disciplinary action, assess such administrative fines and impose such costs against Licensee as it shall deem just and proper and as authorized by law.

KANSAS STATE BOARD OF HEALING ARTS

Kevin K. LaChance, #15058

Disciplinary Counsel

Kansas State Board of Healing Arts
235 S. Topeka Boulevard

Topeka, Kansas 66603-3068

(913) 296-2075

## CERTIFICATE OF SERVICE

evin K. LaChance

I, Kevin K. LaChance, Disciplinary Counsel, Kansas State Board of Healing Arts, hereby certify that I served a true and correct copy of the PETITION TO REVOKE, SUSPEND, OR OTHERWISE LIMIT LICENSURE by United States mail, first class postage prepaid, on this \_\_\_\_\_day of April, 1996, to the following:

Leslie F. Page, D.O. P.O. Box 4446 Wichita, KS 67204-0446

James S. Phillips, Jr.
Phillips & Phillips, Chartered
Epic Center
301 N. Main, Suite 320
Wichita, KS 67202-4818

and the original was hand-delivered to:

Lawrence T. Buening, Jr. Executive Director Kansas State Board of Healing Arts 235 S. Topeka Boulevard Topeka, Kansas 66603-3068