

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.)	
)	
THOMAS A. AVERY, M.D.)	CASE NO. 91-08-1209
Medical License No. 10046,)	
)	
Defendant.)	

COMPLAINT

COMES NOW J.G. Landreth, Investigator for the Oklahoma State Board of Medical Licensure and Supervision, being first duly sworn upon oath and states:

1. That Thomas A. Avery, M.D., holding Oklahoma Medical License No. 10046, is in violation of the Oklahoma Medical Practice Act, 59 O.S. 1991, Sec. 509, Paragraph 16, to-wit:

"16. Inability to practice medicine with reasonable skill and safety to patients by reason of age, illness, drunkenness, excessive use of drugs, narcotics, chemicals, or any other type of material or as a result of any mental or physical condition."

2. That Thomas A. Avery, M.D., is in violation of the Rules and Regulations promulgated by this Board, specifically Rule 435:10-7-4, (3), to-wit:

"(3) The habitual or excessive use of any drug which impairs the ability to practice medicine with reasonable skill and safety to the patient."

3. That since 1983, Defendant has been chemically dependent on alcohol and/or other substances and has suffered related psychological problems to the extent that he can no longer practice medicine with reasonable skill and safety to patients.

4. That by the acts and omissions set forth above, Defendant is perpetuating significant harm to public health, safety and welfare.

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.

J.G. Landreth
J.G. LANDRETH, Investigator
Oklahoma State Board of
Medical Licensure and Supervision

Subscribed and sworn to before me this 27th day of February, 1993.

Sheri Denton
Notary Public

My Commission expires:
January 16, 1995