

IN AND BEFORE THE OKLAHOMA STATE BOARD
OF MEDICAL LICENSURE AND SUPERVISION
STATE OF OKLAHOMA

FILED

STATE OF OKLAHOMA)
EX REL. THE OKLAHOMA BOARD)
OF MEDICAL LICENSURE)
AND SUPERVISION,)

DEC 03 2010

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Plaintiff,)
)
)

v.)

Case No. 09-02-3694

SUZANNE SELF, P.A.,)
LICENSE NO. PA1048,)
)

Defendant.)
)

COMPLAINT

COMES NOW the Plaintiff, the State of Oklahoma ex rel. the Oklahoma State Board of Medical Licensure and Supervision (the "Board"), by and through its attorney, Elizabeth A. Scott, Assistant Attorney General, and for its Complaint against the Defendant, Suzanne Self, P.A., alleges and states as follows:

1. The Board is a duly authorized agency of the State of Oklahoma empowered to license and oversee the activities of physicians assistants in the State of Oklahoma pursuant to 59 Okla. Stat. §480 *et seq.* and §519.1 *et seq.*
2. Defendant, Suzanne Self, P.A., holds Oklahoma physician assistant license no. PA1048.

PRIOR DISCIPLINARY ACTION

3. On or about November 30, 2006, the State filed a Complaint against Defendant based upon allegations that Defendant had written numerous prescriptions for controlled dangerous substances to friends without having examined the patients or documented the prescriptions. Defendant initially lied to Board investigators about her actions. One week later, Defendant admitted that she had lied to Board investigators and admitted that she had written the prescriptions for friends and acquaintances without any examination or documentation of the treatment.

4. On or about January 18, 2007, based upon Defendant's admissions, the Board entered an order accepting the Voluntary Submittal to Jurisdiction whereby Defendant was

placed on a **TWO (2) YEAR PROBATION** to end on January 18, 2009. The Probation provides as follows:

A. Defendant will conduct her practice in compliance with the Oklahoma Physician Assistant Act as interpreted by the Board...

5. The provision cited above was never modified or deleted but remained in full force and effect during the terms of Defendant's probation.

6. On or about January 18, 2009, Defendant probation ended.

CURRENT ALLEGATIONS OF UNPROFESSIONAL CONDUCT

7. Between May 21, 2008 and June 18, 2008, the Oklahoma Bureau of Narcotics and Dangerous Drugs conducted an investigation into illegal drug activity of certain individuals. Specifically, OBN obtained a court order whereby it intercepted cell phone communications of a known drug dealer in Choctaw County, State of Oklahoma.

8. As part of this investigation, on or about May 30, 2008, OBN intercepted phone calls between Defendant and the known drug dealer. In these conversations, Defendant offered to buy drugs from the drug dealer. In a later conversation, Defendant and the drug dealer agreed to meet at her house so that he could bring her the drugs.

9. This incident where Defendant offered to buy drugs (Methamphetamine) from a drug dealer and her actual purchase of the drugs from the drug dealer occurred while Defendant was still on probation with the Board.

10. On or about February 24, 2009, Defendant was arrested for conspiracy to obtain a controlled dangerous substance and the unlawful use of a communication facility to do so.

11. On or about March 2, 2009, Defendant executed an Agreement with the Board Secretary whereby she agreed that she would not practice as a physician assistant until the Board's investigation and potential Complaint had been heard by the Board.

12. On or about September 24, 2010, Defendant entered into a Deferred Prosecution Agreement with the State of Oklahoma whereby she was placed on a **THREE (3) YEAR PROBATION**. Under the terms of her probation, Defendant was ordered to obtain a drug and alcohol assessment, to submit to random drug tests, to attend weekly 12-Step meetings, to make presentations to high schools about alcohol use, abuse and addiction, and to make presentations to the PA Program at the University of Oklahoma about the legal documentation required for the writing of prescriptions.

13. On or about October 14, 2010, Defendant was interviewed by Board investigators. During her interview, Defendant admitted that she had placed the telephone call to the drug dealer, ordered Methamphetamine from him, and that the drug dealer then delivered the

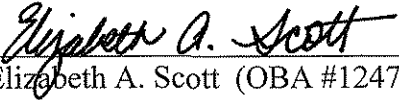
Methamphetamine to her residence. Defendant claimed that she ordered the Methamphetamine for a friend but that she did not ingest it.

14. Defendant is guilty of unprofessional conduct in that she:
 - A. Procured, aided or abetted a criminal operation in violation of 59 O.S. §509(1).
 - B. Violated any provision of the Medical Practice Act or the rules promulgated by the Board in violation of OAC 435:15-5-11(a)(7).
 - C. Engaged in dishonorable or immoral conduct which is likely to deceive, defraud or harm the public in violation of 59 O.S. §509(8) and OAC 435:10-7-4(11).
 - D. Violated any provision of the medical practice act or the rules and regulations of the Board or of an action, stipulation, or agreement of the Board in violation of 59 O.S. §509(13) and OAC 435:10-7-4(39).
 - E. Confessed to a crime involving violation of the antinarcotic laws and regulations of the federal government and the laws of this state in violation of 59 O.S. §509(7).
 - F. Prescribed, sold, administered, distributed, ordered, or gave any drug legally classified as a controlled substance or recognized as an addictive or dangerous drug for other than medically accepted therapeutic purposes in violation of OAC 435:10-7-4(24).
 - G. Violated any state or federal law or regulation relating to controlled substances in violation of OAC 435:10-7-4(27).

Conclusion

WHEREFORE, the Plaintiff respectfully requests that the Board conduct a hearing, and, upon proof of the allegations contained herein, impose such disciplinary action as authorized by law, up to and including suspension or revocation and any other appropriate action with respect to Defendant's physician assistant license, and an assessment of costs and attorney's fees incurred in this action as provided by law.

Respectfully submitted,



Elizabeth A. Scott (OBA #12470)

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State of Oklahoma

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