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

STATE OF OKLAHOMA

STATE OF OKLAHOMA

STATE OF OKLAHOMA

EX REL. THE OKLAHOMA BOARD

OF MEDICAL LICENSURE

AND SUPERVISION,

Plaintiff,

vs.

Case no. 09-02-3694

SUZANNE SELF, P.A.,

LICENSE NO. PA1048

Defendant.

VOLUNTARY SURRENDER OF LICENSE IN LIEU OF PROSECUTION

State of Oklahoma)
)
Oklahoma County)

- I, Suzanne Self, P.A., being of lawful age and after first being duly sworn, depose and state as follows:
 - 1. I hereby voluntarily surrender my Oklahoma physician assistant license no. PA1048. In addition, I chose not to renew my physician assistant license in March, 2011, based on my decision to reside in the state of Texas, and not practice medicine in the State of Oklahoma.
 - 2. The surrender of my license is freely and voluntarily made. I have not been subject to any coercion or duress, and I am fully aware of the consequences of the surrender of my license.
 - 3. I am the subject of an investigation and Complaint by the Oklahoma State Board of Medical Licensure and Supervision involving allegations that if proven, would constitute grounds for disciplinary action by the Board.

- 4. The allegation to which I admit guilt is as follows:
 - A. Defendant, Suzanne Self, P.A., held Oklahoma physician assistant license no. PA1048 until March 2011, at which time she chose not to renew said license based on her residing in the state of Texas and choosing not to practice medicine in the state of Oklahoma.
 - B. 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.
 - C. 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:
 - i. Defendant will conduct her practice in compliance with the Oklahoma Physician Assistant Act as interpreted by the Board...
 - D. The provision cited above was never modified or deleted by remained in full force and effect during the terms of Defendant's probation.
 - E. On or about January 18, 2009, Defendant's probation ended.
 - F. 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.
 - G. As part of this investigation, on or about May 30, 2008, OBN intercepted two phone calls between Defendant and a drug dealer. In these conversations, Defendant offered to buy methamphetamine from the individual. Defendant later claimed that the methamphetamine was for a third party's use, not her personal use.
 - H. The incident referenced above occurred while Defendant was still on probation with the Board.
 - I. 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. (See paragraph K for further information relevant to the disposition of the criminal allegation.
- J. 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. Defendant received her license back without restriction from the Board in October of 2010. Defendant further chose not to renew her license in March of 2011, based on her residing in the state of Texas, and choosing not to practice medicine in the state of Oklahoma.
- K. The criminal charges relevant to Defendant's arrest on February 24, 2009 were dismissed on September 24, 2010, and all public records of the arrest were expunged pursuant to an Order Allowing Expungement and Sealing of Record filed January 4, 2011. 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. Pursuant to the Deferred Prosecution Agreement, Defendant had four separate drug/alcohol assessments, all of which revealed no issues with chemical dependency. Furthermore, all Defendant completed all of the drug screenings were negative. conditions of the Deferred Prosecution Agreement early, and on May Prosecution Agreement 2011. the Deferred terminated/dismissed, based on Defendant's early completion of all required conditions. .
- L. On or about October 14, 2010, Defendant was interviewed by Board investigations. During her interview, Defendant admitted that she has placed the telephone call to the individual to purchase methamphetamine. Defendant told the investigators that the methamphetamine was for a third party, not for her personal use.

M. Defendant is admitting unprofessional conduct in that she:

i. Procured, aided or abetted a criminal operation in violation of 59 O.S. §509(1).

- ii. 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).
- iii. 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).
- iv. 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).
- v. Confessed to a crime involving violation of the anti-narcotic laws and regulations of the federal government and the laws of this state in violation of 59 O.S. §509(7).
- vi. Violated any state or federal law or regulation relating to controlled substances in violation of OAC 435:10-7-4(27).
- 5. I hereby submit my wallet card and wall certificate as evidence of my intent to surrender my license. Furthermore, as noted previously, I chose not to renew my physician assistant license for the state of Oklahoma in March of 2011.
- 6. I hereby agree that I will not apply for reinstatement of my Oklahoma physician assistant license for a minimum of one year from the entry of the Order Accepting Voluntary Surrender in Lieu of Prosecution, and that if the Board ever reinstates my Oklahoma physician assistant license, it will be under terms of probation to be set by the Board at the time of reinstatement
- 7. As a condition to accepting my surrender of license in lieu of prosecution, I acknowledge that the Board may require me to pay all costs expended by the Board for any legal fees and costs, and any investigation, probation and monitoring fees, including but not limited to staff time, salary and travel expense, witness fees and attorney fees.

DATED this $\frac{13}{2}$ day of $\frac{1}{2}$ day of $\frac{1}{2}$, 2011.

SUZÁNNE SELF, P.A.

Subscribed and sworn before me this 13th day	y of <u>July</u> , 2011.
	Notary Public Public
My commission expires on $\frac{01/10 2015}{}$	HINN R. BYENNIN
ACCEPTED	# 07000559 EXP. 01/16/15 OF OKLANIII

Oklahoma State Board of Medical Licensure and Supervision

Secretary

Date: 7-12-11