

IN AND BEFORE THE STATE BOARD OF MEDICAL EXAMINERS

STATE OF OKLAHOMA

STATE OF OKLAHOMA, ex rel,
STATE BOARD OF MEDICAL
EXAMINERS,

Plaintiff,

v.

JIMMY CHARLES MARTIN, M.D.,
Medical License No. 10534,

Defendant.

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STATE BOARD
MEDICAL EXAMINERS

COMPLAINT

COMES NOW D. C. Mosshart, Inspector for the Oklahoma Board of Medical Examiners, being first duly sworn upon oath and states:

1. That Jimmy Charles Martin, M.D., holding Oklahoma Medical License No. 10534, is in violation of the Oklahoma Medical Practice Act, 59 O.S. 1981, §509, Paragraphs 5, 11, 16 and 17, to-wit:

"5. Habitual intemperance or the habitual use of habit-forming drugs."

"11. Failure to keep complete and accurate records of purchase and disposal of controlled drugs or of narcotic drugs."

"16. The 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."

"17. Prescribing, dispensing or administering of controlled substances or narcotic drugs in excess of the amount considered good medical practice, or prescribing, dispensing or administering controlled substances or narcotic drugs without medical need in accordance with published standards."

2. That Jimmy Charles Martin, M.D., is in violation of the Rules and Regulations promulgated by this Board, specifically Section IX, Rules 2, 3, 5 and 6, to-wit:

"Rule 2: Prescribing, dispensing or administering of controlled or narcotic drugs in excess of the amount considered good medical practice."

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

"Rule 5: Purchasing or prescribing any regulated substance in Schedules I through V, as defined by the Uniform Controlled Dangerous Substance Act, for the physician's personal use."

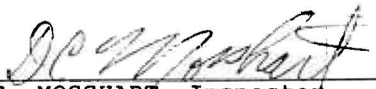
"Rule 6: Dispensing, prescribing or administering a controlled substance or narcotic drug without medical need."

3. That during the period of time from on or around January 1, 1982, to on or around May 31, 1983, the Defendant ordered unusually large amounts of injectable Demerol (Meperidine), and of the 4,175 cc of Demerol received at the Bassett Clinic from Defendant's orders, approximately 366 cc were utilized at the clinic to treat patients and approximately 3,809 cc were signed out to the Defendant for use on house calls and treatment of his horses, and Defendant received an additional 250 cc of Demerol during this time from Ken's Pharmacy, and during this time the Defendant injected himself from 75 to 100 times with liquid Demerol and injected his girl friend, Celia Kinzie, from 30 to 50 times with liquid Demerol.

4. That during this time, Defendant did not keep complete and accurate records of the disposal of the aforesaid Demerol, nor did the Defendant or his girl friend have any medical need that required the aforesaid Demerol

5. That Defendant is unable to practice medicine with reasonable skill and safety to patients because of excessive use of the aforesaid Demerol.

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.


D. C. MOSSHART, Inspector
State Board of Medical Examiners

Subscribed and sworn to before me this 9th day of December, 1983.


Notary Public

My commission expires
May 19, 1987