

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.)

WILLIAM H. PHILPOTT, M.D.)
Medical License No. 10713)

CASE NO. 88-2-574

Defendant.

COMPLAINT

COMES NOW Sharon Nash, Investigator for the Oklahoma State Board of Medical Licensure and Supervision, being first duly sworn upon oath and states

1. That William H. Philpott, M.D., holding Oklahoma Medical License No. 10713, is in violation of the Oklahoma Medical Practice Act, 59 O.S. 1981, Sec. 509, for unprofessional conduct.

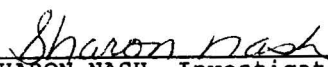
2. That the Defendant did under the guise of the practice of medicine and surgery perform certain procedures on minor patients C.B. and A.S. in an unprofessional manner.

3. That on or around July 1, 1986, Defendant was the subject of Administrative Complaint No. 0048350 filed by the State of Florida, Department of Professional Regulation, Board of Medical Examiners. The Board alleged Defendant was treating a patient for systemic lupus erythematosus and Defendant (1) failed to meet the level of care, skill and treatment which is recognized in the medical community, (2) failed to keep adequate medical records to justify the course of treatment, (3) failed to practice medicine with reasonable skill and safety and failed to practice medicine with that level of care, skill or treatment recognized by a reasonably prudent similar physician as acceptable under similar conditions and circumstances, and (4) that Defendant's treatment was beyond the scope of his medical training. A copy of that Administrative Complaint is attached hereto and marked Exhibit A.

4. That on or around July 16, 1986, Defendant was the subject of Administrative Complaint No. 0056741 filed by the State of Florida, Department of Professional Regulation, Board of Medical Examiners. The Board alleged Defendant was treating a patient for depression and Defendant (1) subjected the patient to extensive laboratory tests, including toxic screening and allergy testing, many of which were inappropriate and/or unnecessary, (2) failed to perform adequate physical examination on the patient prior to initiating testing, (3) used a carbohydrate tolerance test not considered to be diagnostically useful, (4) used treatment on the patient that included the use of hyperbaric oxygen, nonconvulsive shock therapy, vitamin infusions and nutritional supplements, (5) constituted in whole or in part experimentation on a human subject and Defendant failed to obtain full, informed or written consent, (6) failed to keep written records justifying the course of treatment, (7) failed to practice medicine with that level of care, skill and treatment recognized by a reasonably prudent similar physician as being acceptable under similar conditions, and (8) Defendant's charges for treatment of the aforesaid patient totaled in excess of \$10,600.00 and said charges were exploitation of the patient for financial gain. A copy of that Administrative Complaint is attached hereto and marked Exhibit B.

5. That on or around June 15, 1989, Defendant voluntarily entered into a Stipulation with the Department of Professional Regulation, Board of Medicine, wherein Defendant relinquished his license to practice medicine in the State of Florida, No ME0004977, and further Defendant agreed to never re-apply for licensure as a physician in the State of Florida. A copy of that Stipulation is attached hereto and marked Exhibit C.

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.


SHARON NASH, Investigator
State Board of Medical Licensure
and Supervision

Subscribed and sworn to before me this 2nd day of May, 1990.

Michael D. Kiser
Notary Public

My Commission expires:
2-6-93