

IN AND BEFORE THE STATE BOARD OF MEDICAL EXAMINERS

STATE OF OKLAHOMA

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

Plaintiff,

v

V.G. BHOPALE, M.D.,
Medical License No. 10822,

)
Defendant.)

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STATE BOARD
MEDICAL EXAMINERS

COMPLAINT

COMES NOW Phil McPherren, Inspector for the Oklahoma Board of Medical Examiners, being first duly sworn upon oath and states:

1. That V.G. Bhopale, M.D., holding Oklahoma Medical License No. 10822, is in violation of the Oklahoma Medical Practice Act, 59 O.S. 1981, §509, Paragraphs 13 and 17, to-wit:

"13. Prescribe or administer a drug or treatment without sufficient examination and the establishment of a valid physician-patient relationship."

"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 V.G. Bhopale, M.D., is in violation of the Rules and Regulations promulgated by this Board, specifically Section IX, Rules 1, 2 and 6, to-wit:

"Rule 1: Indiscriminate or excessive prescribing, dispensing or administering of controlled or narcotic drugs."

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

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

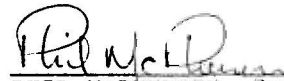
3. That during the time period of June 15, 1981, to March 22, 1984, Defendant saw a person, one J.L., on approximately 36 office visits and wrote prescriptions for the aforesaid patient on approximately 34 occasions for Preludin Endurets for a total

of 1,020 dosage units. Said Preludin is a Schedule II controlled dangerous substance under Oklahoma law.

4. That the Defendant on the above dates and times did not sufficiently examine the person, J.L., or establish a valid physician-patient relationship, but instead engaged in sexual activity with J.L. in exchange for a written prescription for the aforesaid Preludin.

5. That the Defendant on the above dates prescribed a controlled dangerous substance in excess of the amount considered good medical practice and without medical need in accordance with published standards

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.



PHIL MCPHERREN, Inspector
State Board of Medical Examiners

Subscribed and sworn to before me this 17th day of April, 1984.


Notary Public

My commission expires:

June 30, 1986