

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

**FILED**

**STATE OF OKLAHOMA ex rel.** )  
**OKLAHOMA STATE BOARD OF** )  
**MEDICAL LICENSURE AND** )  
**SUPERVISION,** )  
  
  **Plaintiff,** )  
  
**vs.** )  
  
**AMAL EID “AL” MOORAD, M.D.** )  
**LICENSE NO. 10853** )  
  
  **Defendant.** )

JUN 13 2014

OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE & SUPERVISION

CASE NO. 14-01-4896

**COMPLAINT**

Plaintiff, State of Oklahoma ex rel. the Oklahoma State Board of Medical Licensure and Supervision (the “Board”), by and through its attorney, Matthew R. Stangl, Assistant Attorney General, for its Complaint against Amal Eid “Al” Moorad, M.D. (“Defendant”), states and alleges as follows:

1. The Board is a duly authorized agency of the State of Oklahoma empowered to license and oversee the activities of physicians and surgeons in the State of Oklahoma pursuant to 59 Okla. Stat. § 480 *et seq.* and Oklahoma Administrative Code (“OAC”) 435:1-1-1 *et seq.*
2. Defendant, Amal Eid “Al” Moorad, M.D., holds Oklahoma medical license no. 10853.

**Allegations of Unprofessional Conduct**

3. This case was initiated as a result of information received by the Oklahoma Pharmacy Board from MedVantx Pharmacy in Sioux Falls, S.D., that one-hundred and twenty (120) prescriptions signed by Defendant were received during a time period that Defendant was confirmed to be out of the country (December 23, 2013, to January 13, 2014).

4. On January 9, 2014, Board Investigator SW traveled to Defendant's office and visited with the office manager who explained that Defendant travelled out of the country on December 23, 2013, and would not return to the office until January 13, 2014. She stated Defendant left a number of pre-signed prescriptions and that she and another nurse would fill out the patient name, date, and medication. The office manager further stated that she did not realize this was against the rules.
5. On January 13, 2014, Board Investigator SW (along with two agents from the Oklahoma Bureau of Narcotics) met with Defendant and questioned him regarding the C-II prescriptions authorized while he was out of the country. Defendant stated that a large percentage of his patients are workers' compensation clients, and that while he rarely leaves the country or is unable to be reached via telephone, this time he was in/and around Australia and was unable to be reached via telephone. **Defendant admitted to leaving a pre-signed prescription pad(s) for his nurse and office manager to be utilized and provided to those patients while he was out of the country.** Defendant left the signed prescription pad(s) in the top middle desk drawer of his office.
6. A review of Defendant's prescribing record on January 29, 2014, revealed that **Defendant unlawfully authorized approximately one-hundred and thirty (130) C-II prescriptions during the seventeen (17) day period between December 23, 2013 and January 9, 2014 that he was out of the country.**
7. Based on the foregoing allegations, Defendant is guilty of unprofessional conduct in that he engaged in:
  - a) [C]onfession of a crime involving violation of:
    - a) The antinarcotic or prohibition laws and regulations of the federal government,
    - b) the laws of this state, or
    - c) State Board of Health rules, in violation of 59 Okla. Stat. § 509(8);
  - b) Dishonorable or immoral conduct which is likely to deceive, defraud, or harm the public, in violation of 59 Okla. Stat. § 509(8) and OAC 435:10-7-4(11);
  - c) The violation, or attempted violation, direct or indirect, of any of the provisions of the Oklahoma Allopathic Medical and Surgical Licensure and Supervision Act, either as a principal, accessory or accomplice, in violation of 59 Okla. Stat. § 509(13) and OAC 435:10-7-5(39);
  - d) Aiding or abetting, directly or indirectly, the practice of medicine by any person not duly authorized under the laws of this state, in violation of 59

Okla. Stat. § 509(14);

- e) Aiding or abetting the practice of medicine and surgery by an unlicensed, incompetent, or impaired person, in violation of OAC 435:10-7-4(21);
- f) Violating any state or federal law or regulation relating to controlled substances in violation of OAC 435:10-7-4(27); and
- g) Title 21 CFR 1306.05 provides as follows:

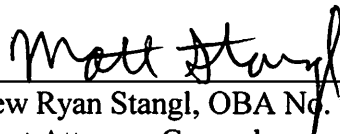
**Manner of issuance of prescriptions –**

- (a) All prescriptions for controlled substances shall be dated as of, *and signed on, the day when issued* and shall bear the full name and address of the patient, the drug name, strength, dosage form, quantity prescribed, directions for use, and the name, address and registration number of the practitioner. (Emphasis added.)

**Conclusion**

Plaintiff, State of Oklahoma, 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, the assessment of costs and fees incurred in this matter, and any other appropriate action with respect to Defendant's medical license as provided by law.

Respectfully submitted,



---

Matthew Ryan Stangl, OBA No. 20343  
Assistant Attorney General  
State of Oklahoma  
313 N.E. 21<sup>st</sup> Street  
Oklahoma City, OK 73105  
Phone: (405) 521-3921  
Fax: (405) 522-4536

*Attorney for State of Oklahoma ex rel.  
The Oklahoma State Board of Medical  
Licensure and Supervision*