

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

FILED

STATE OF OKLAHOMA)
EX REL. THE OKLAHOMA BOARD)
OF MEDICAL LICENSURE)
AND SUPERVISION,)
)
Plaintiff,)
)
v.)
)
MICHAEL WILLIAM GODDARD, M.D.,)
MEDICAL LICENSE NO. 10925,)
)
Defendant.)

DEC 11 2003

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 02-04-2500

COMPLAINT

COMES NOW the Plaintiff, the State of Oklahoma ex rel. the Oklahoma State Board of Medical Licensure and Supervision (the "Board"), by and through its attorney, Elizabeth A. Scott, Assistant Attorney General, and for its Complaint against the Defendant, Michael William Goddard, M.D., alleges and states 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.*
2. Defendant, Michael William Goddard, M.D, holds Oklahoma medical license no. 10925.
3. On or about March 26, 2002, Defendant executed an agreement whereby he authorized Gary Lay, an unlicensed person, to treat patients in his absence and to prescribe medications to his patients using Defendant's DEA number.
4. Pursuant to this agreement, Gary Lay treated several of Defendant's patients and wrote at least 18 prescriptions to these patients using Defendant's DEA number.
5. Based on the allegations stated above, Defendant is guilty of unprofessional conduct as follows:
 - A. Violated, directly or indirectly, the provisions of the Oklahoma Allopathic Medical and Surgical Licensure and

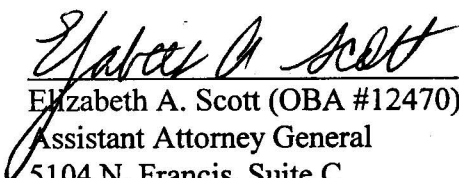
Supervision Act, and the rules and regulations of the Board, either as a principal, accessory or accomplice in violation of 59 Okla. Stat. §509(14) and OAC 435:10-7-4(39).

- B. Aided or abetted the practice of medicine and surgery by an unlicensed, incompetent, or impaired person in violation of OAC 435:10-7-4(21).
- C. Aided or abetted, directly or indirectly, the practice of medicine by any person not duly authorized under the laws of this state in violation of 59 O.S. §509(15).
- D. Engaged in conduct which is likely to deceive, defraud or harm the public in violation of 59 O.S. §509(9) and OAC 435:10-7-4(11).
- E. Engaged in the delegation of authority to another person for the signing of prescriptions for either controlled or non-controlled drugs in violation of OAC 435:10-7-4(7).
- F. Violated any state or federal law or regulation relating to controlled substances in violation of OAC 435:10-7-4(27).

WHEREFORE, plaintiff 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 action, and any other appropriate action with respect to Defendant's license to practice as a physician and surgeon in the State of Oklahoma.

Dated this 17th day of December, 2003 at 8:30 p.m.

Respectfully submitted,


Elizabeth A. Scott (OBA #12470)
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Oklahoma City, OK 73118
Attorney for State ex rel.
Oklahoma State Board of Medical Licensure
and Supervision