

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

FILED

JUN 10 2002

STATE OF OKLAHOMA
EX REL. THE OKLAHOMA BOARD
OF MEDICAL LICENSURE
AND SUPERVISION,

Plaintiff,

v.

STANLEY SCOTT HANAN, M.D.,
MEDICAL LICENSE NO 11542,

Defendant.

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 92-10-1435

ANSWER

COMES NOW the Defendant, Stanley Scott Hanan, M.D., by and through his attorneys of record, Reuben Davis and Gerald Hilsher of Boone, Smith, Davis, Hurst & Dickman, and for his Answer to the Complaint, Defendant alleges and states as follows:

- 1 Defendant admits the statutory authority of the Board.
2. Defendant admits he holds medical license no. 11542 under an Agreed Final Order Granting Reinstatement of License and Imposing Probation and Monitoring dated July 23, 1998.
3. Defendant can neither admit nor deny the allegations of Paragraph 3 of the Complaint. Defendant objects on the ground of due process to the spoliation and destruction of the envelope and the loss of the opportunity to examine the envelope for fingerprints. Without the envelope, there is no evidence sufficient to meet the clear and convincing standard of proof necessary to find a violation.
4. Defendant can neither admit nor deny the allegations of Paragraph 4 of the Complaint, except to emphatically deny that he sent the subject envelope or caused the subject envelope to be mailed.
5. Defendant admits to receiving the letter referred to in Paragraph 5.
6. Defendant admits that he responded to Ms. Scott's letter and continues to deny the allegation that he sent the pill to Dr. Zumwalt.

7. Defendant denies that he addressed or sent the envelope to Dr. Zumwalt. Defendant further submits that the conclusion of Ernest D. Smith, Forensic Document Examiner, that the envelope was addressed by Defendant is in error, and furthermore, that handwriting analysis is not a science requiring specialized or technical knowledge and is not sufficiently reliable for Mr. Smith's testimony to be admitted as expert opinion testimony

8. Defendant denies that he is guilty of unprofessional conduct, and specifically avers:

- A. He is physically and mentally capable of practicing medicine and surgery with reasonable skill and safety.
- B. He has not engaged in practice or other behavior that demonstrates an incapacity or incompetence to practice medicine and surgery.
- C. He has not engaged in the use of any false, fraudulent or deceptive statement in any document connected with the practice of medicine and surgery.

WHEREFORE, Defendant prays that following a proper hearing in this matter that he be vindicated and these charges dismissed for lack of proof.

Dated this 7th day of June, 2002.

Respectfully submitted,



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SS.

That he is the Defendant above-named, he has read the foregoing Answer and understands same, and that the facts contained therein set forth are true and correct.

Stanley Scott Hanan

7 day of June

Notary Public

9/22/08

