## IN AND BEFORE THE STATE BOARD OF MEDICAL EXAMINERS

STATE OF OKLAHOMA

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

v.

Plaintiff

JOHN BRENDON O'KEEFFE, M.D., ) Medical License No. 11660, ) CASE NO. 86-12-460

Defendant. )

## COMPLAINT

COMES NOW J.G. Landreth, Investigator for the Oklahoma Board of Medical Examiners, being first duly sworn upon oath and states:

 That John Brendon O'Keeffe, M.D., holding Oklahoma Medical License No 11660, is in violation of the Oklahoma Medical Practice Act, 59 O.S 1981, \$509, Paragraph 17, to-wit:

> "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 John Brendon O'Keeffe, 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 from November 1, 1986, through March 10, 1987, Defendant wrote approximately 1,013 prescriptions for controlled or narcotic drugs totalling 54,174 dosage units plus 66 prescriptions of other forms of controlled or narcotic drugs totalling 7,072 units.

4. That a prescription survey conducted in reference to certain scheduled drugs reveals that patient H.O. received

approximately 35 prescriptions from the time of November 3, 1986, to March 6, 1987, for 3,170 dosage units of controlled or narcotic drugs for an average of 22.48 dosage units per day.

5. That the survey reveals that patient P.V. received 13 prescriptions for controlled or narcotic drugs from November 4, 1986, through February 5, 1987, for a total of 745 dosage units for an average of 7.84 dosage units per day.

6. That the survey reveals that patient F.S. received 10 prescriptions for controlled or narcotic drugs from November 8, 1986, through February 26, 1987, for a total of 870 dosage units for an average of 7.77 dosage units per day.

7. That the survey reveals that patient J.T. received 12 prescriptions for controlled or narcotic drugs from the period of November 11, 1986, through March 2, 1987, for a total of 800 dosage units for an average of 7.08 dosage units per day.

8. That patient records reveal that scheduled drugs were being prescribed in excess of the amount considered for the medical need presented.

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.

J.G. LANDRETH, Investigator State Board of Medical Examiners

upsyribed and sworn to before me this day of , 1987. taulin

My Commission expires: