STATE BOARD OF MEDICAL EXAMINERS OF THE STATE OF OKLAHOMA

STATE OF OKLAHOMA,)	
Plaintiff,	RECEIVE	D
GEORGIA ANNE THOMAS, M.D.	JUL 9 1979	
Defendant	STATE BOARD MEDICAL EXAMINE	ERS

DR. H. B. TATE, SECRETARY STATE BOARD OF MEDICAL EXAMINERS, STATE OF OKLAHOMA, 5104 NORTH FRANCIS, SUITE C OKLAHOMA CITY, OKLAHOMA 73118

COMPLAINT

Comes now Carole A. Smith, Inspector for the State Board of Medical Examiners of Oklahoma City, Oklahoma, being first duly sworn upon oath, and states:

- 1. That DOCTOR GEORGIA ANNE THOMAS, holding Oklahoma Medical License Number 11760, is charged with unprofessional conduct, to wit: violation of the Oklahoma Medical Practice Act: 59 O.S. § 509, more specifically subsections 5, 12 and 13 as follows:
 - "5. Habitual intemperance or the habitual use of habit-forming drugs."
 - "12. The writing of false or fictitious prescriptions for any drugs or narcotics declared by the laws of Oklahoma to be controlled or narcotic drugs."
 - "13. Prescribe or administer a drug or treatment without sufficient examination and the establishment of a valid physician-patient relationship.
- 2. That DOCTOR GEORGIA ANNE THOMAS is in further violation of the Rules and Regulations of the Oklahoma State Board of Medical Examiners, Rule 29 (a), (c) and (d), to wit
 - (a) Indiscriminate or excessive prescribing of controlled or narcotic drugs."
 - (c) The habitual or excessive use of any drug which impairs the ability to practice medicine with reasonable skill and safety to the patient.

(d) Prescriptions written for controlled or narcotic drugs without a medical need therefor shall be considered a false or fictitious prescription.

3 That DOCTOR GEORGIA ANNE THOMAS has habitually used a habitforming drug to wit: Dilaudid.

That in March of 1979 DOCTOR GEORGIA ANNE THOMAS wrote false and fictitious prescriptions for Controlled Dangerous Substances to Coletha Yeakel, Mildred Tucker and Vicki Spann.

That said prescriptions were issued without sufficient examinations and the establishment of valid doctor-patient relationships.

That prescriptions were written by DOCTOR GEORGIA ANNE THOMAS to Vicki Spann and Coletha Yeakel for the purpose of obtaining drugs for the doctor's personal use.

7. That DOCTOR GEORGIA ANNE THOMAS is the holder of an unrevoked license to practice medicine and surgery in the State of Oklahoma and that, upon proof of the above cited facts, complainant prays this Board to take such action as is authorized and as it deems necessary including revocation or suspension of the license to practice medicine and surgery in the State of Oklahoma

Subscribed and sworn to before me this 9th day of guly ,1979.

Notary Public

My commission expires. I - 1 My commission expires: September 12,1980.