IN AND BEFORE THE STATE BOARD OF MEDICAL EXAMINERS

STATE OF OKLAHOMA

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

RECEIVED

Plaintiff,

JUL 2 1 1986

RONALD L. HILL, M.D.,
Medical License No. 11844,

STATE BOARD MEDICAL EXAMINERS

Defendant.

COMPLAINT

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

- 1. That Ronald L. Hill, M.D., holding Oklahoma Medical License No. 11844, is in violation of the Oklahoma Medical Practice Act, 59 O.S. 1981, \$509, Paragraph 17, to-wit:
 - "17. 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 Ronald L. Hill, 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 January 1, 1986, through May 27, 1986, Defendant wrote approximately 80 prescriptions for Schedule II drugs in a total amount of 2,612 dosage units and in the period of time from January 1, 1986, through May 27, 1986, Defendant wrote a total of approximately 1,242 prescriptions for Schedule III, IV and V drugs in the total amount of 58,040 dosage units, plus 4,250 cc's and 2 ounces of liquid

- 4. That a prescription survey conducted in reference to certain scheduled drugs reveals that patient H.L. received approximately 8 prescriptions for 660 dosage units of scheduled drugs from March 26, 1986, through May 20, 1986, for an average of 11.78 dosage units per day of scheduled drugs.
- 5. That the survey reveals that patient A.J. received 8 prescriptions for a total of 800 dosage units of scheduled drugs from February 1, 1986, through May 15, 1986, for an average of 7.76 dosage units per day of scheduled drugs.
- 6. That the survey reveals that patient N.H. received 8 prescriptions for a total of 556 dosage units of scheduled drugs from February 28, 1986, through May 5, 1986, for an average of 8.29 dosage units per day of scheduled drugs.
- 7. That the survey reveals that patient C.B. received approximately 26 prescriptions for a total of 1,054 dosage units of scheduled drugs from January 2, 1986, through May 17, 1986, for an average of 7.75 dosage units per day of scheduled drugs.
- 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, Inspector State Board of Medical Examiners

Subscribed and sworn to before me this 25 day of 74/7,

John L. Tallert

My commission expires: