

IN AND BEFORE THE STATE BOARD OF MEDICAL EXAMINERS
STATE OF OKLAHOMA

STATE OF OKLAHOMA, ex. rel.,)
BOARD OF MEDICAL EXAMINERS,)
Plaintiff,)
-vs-)
HERMAN RUDNICK, M.D.,)
Defendant.)

RECEIVED
DEC 3 - 1979
STATE BOARD
MEDICAL EXAMINERS

TO: H. B. TATE, M.D., SECRETARY
STATE BOARD OF MEDICAL EXAMINERS
5104 NORTH FRANCIS, SUITE C
OKLAHOMA CITY, OKLAHOMA

COMPLAINT

Comes now CAROLE A. SMITH, Inspector for the State Board of Medical Examiners, State of Oklahoma, being first duly sworn upon oath, does hereby state:

1. That HERMAN RUDNICK, M.D., holding Oklahoma Medical License Number 12009, is in violation of the Oklahoma Medical Practice Act, 59 O.S. 1978 Supp., Section 509, Subsections 9, 13, and 15, to wit:

"9. Dishonorable or immoral conduct which is likely to deceive or defraud the public. "

"13. Prescribe or administer a drug or treatment without sufficient examination and the establishment of a valid physician-patient relationship."

"15. Aiding or abetting, directly or indirectly, the practice of medicine by any person not duly authorized under the laws of Oklahoma."

2. That Dr. RUDNICK is either employed by or is doing professional services for a corporation known as Professional Reducing Center. Said professional services includes the writing of prescriptions for H.C.G. (Human Chorionic Gonadotropin).

3. That said prescription is issued by the doctor without sufficient examination and without establishment of a valid patient-physician relationship.

4. That once the "physical" is given by the doctor and prescription is written, the doctor no longer has contact with the patient and no longer oversees the treatment ordered.

5. That the doctor either personally or through his agents represents to the patients and public at large that H.C.G. has no known side effects and that it induces weight loss.

6. That Dr. RUDNICK aids and abets unlicensed persons to practice medicine within the State of Oklahoma by allowing persons to administer the H.C.G. by injection. Said persons are not licensed medical doctors, nor licensed to give injectable drugs without direct supervision of the physician.

7. That Dr. RUDNICK is the holder of an unrevoked license to practice medicine and surgery in this State.

8. That upon proof of the matters herein alleged, Complainant prays this Board to take such disciplinary action as is authorized by law.

Respectfully submitted.

Carole Smith
COMPLAINANT

Subscribed and sworn to before me this 3rd day of December, 1979.

Betty G Rogers
NOTARY PUBLIC

My Commission Expires: September 12, 1980