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

STATE OF OKLAHOMA, ex rel. STATE BOARD OF MEDICAL EXAMINERS,		RECEIVED
Plaintiff,	)	
-VS-	)	MAR 29 1982
MICHAEL L. ROSENFELD, M.D. Medical License No. 12509,	) ) )	STATE BOARD MEDICAL EXAMINERS
Defendant.	ý	

## COMPLAINT

COMES NOW D.C.Mosshart, Inspector for the Oklahoma State Board of Medical Examiners, and being first duly sworn upon oath, states as follows:

- 1. That MICHAEL L. ROSENFELD, M.D., holding Oklahoma Medical License

  Number 12509, is charged with unprofessional conduct, to wit: Violation of the Oklahoma

  Medical Practice Act, 59 O.S. 1980 Supp., § 509, paragraphs 5, 6, 8, 10, and 12, to wit:
  - "5. Habitual intemperance or the habitual use of habit forming drugs.
  - "6. Conviction of a felony or of any offense involving moral turpitude.
  - "8. Conviction or confession of a crime involving the violation of the antinarcotic or prohibition laws and regulations of the federal government or the Board of Health laws and regulations of the State of Oklahoma.
  - "10. The commission of any act which is a violation of the criminal laws of Oklahoma when such act is connected with the physician's practice of medicine.....
  - "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."
- That for the past five years Dr. Rosenfeld has been chemically dependent on drugs.
- That during the past six months, Dr. Rosenfeld has been taking the drug Nembutal;said drug was not prescribed by another physician.
- 4. That in order to obtain the drug Nembutal, Dr. Rosenfekld wrote false and fictitious prescriptons to two persons; said prescriptons were not written for any medical need; said prescriptions were written in order for the doctor to obtain the drugs for his own personal use.
- 5. That in March 1982, Dr. Rosenfeld entered a plea of guilty to two charges of Conspiracy to Obtain a Controlled Dangerous Substance; felony charges which constitute felony convictions.
  - 6. That upon proof of the facts herein alleged, Complaint prays this Board to take

## COMPLAINT-MICHAEL L. ROSENFELD, M.D.

such action as it deems necessary and as is authorized by law.
D.C.MOSSHART, COMPLAINANT INSPECTOR, STATE BOARD OF MEDICAL EXAMINERS
Subscribed and sworn to before me this 29 day of March, 1982.  NOTARY PUBLIC
My Commussion Expres:
9/19/1983 (Seal)/