IN AND BEFORE THE OKLAHOMA STATE BOARD OF PODIATRIC MEDICINE

)

STATE OF OKLAHOMA

STATE OF OKLAHOMA, ex rel,
OKLAHOMA STATE BOARD OF
PODIATRIC MEDICINE,
Plaintiff,
vs.
DAVID L. GREEN,
License No: 128
Defendant.

Case No. 96-03-003

COMPLAINT

)

COMES NOW Clifford D. McEntire, Legal Counsel for the Oklahoma State Board of Podiatric Medicine, and sets forth the following complaint against David L. Green, D.P.M., to wit:

COUNT I.

That between the dates of January 26, 1994, and October
 25, 1995, The second seco

That as a result of said doctor-patient relationship,
 Dr. Green did prescribe prescription medication on a consistent
 basis outside the scope of his practice as a podiatric physician;

3. That said prescriptions on a routine and prolonged basis may lead to chemical abuse and/or dependency;

4. That said prescription writing is beyond the scope of the Podiatric Medical Practice Act of the State of Oklahoma and Dr. Green should be required to appear and make an accounting before the Oklahoma State Board of Podiatric Medical Examiners; 5. That said appearance and accounting should be declared on an emergency basis for the public safety and welfare of the citizens of the State of Oklahoma.

· · · · ·

COUNT II.

6. That Paragraphs One through Five, inclusively, be incorporated herein and made a part hereof;

7. That between the dates of August 29, 1992, and March
20, 1996,
20, 1996,
20, 1996,
20, 1996,

8. That as a result of said doctor-patient relationship, Dr. Green did prescribe prescription medication on a consistent basis outside the scope of podiatric medicine;

9. That said prescription writing on a routine and prolonged basis may lead to chemical abuse and/or dependency;

10. That said practice is beyond the scope of the Podiatric Medical Practice Act of the State of Oklahoma and Dr. Green should be required to appear and make an accounting before the Oklahoma State Board of Podiatric Medical Examiners;

11. That said appearance and accounting should be declared on an emergency basis for the public safety and welfare of the citizens of the State of Oklahoma.

WHEREFORE, complainant herein demands that a Citation be issued David L. Green, D.P.M., setting forth the above stated complaints and commanding David L. Green, D.P.M., to appear before the Oklahoma State Board of Podiatric Medicine to show

ġ,

cause as to why disciplinary action should not be taken consistent with the findings of said Board and that said Citation be issued on an emergency basis consistent with the rules of the Administrative Practice Act of the State of Oklahoma.

Respectfully submitted,

Clifford D. McEntire, (OBA#12728 Legal Counsel, Oklahoma State Board of Podiatric Medicine. 1700 Exchange Avenue Oklahoma City, OK 73108 (405) 235-8903

STATE OF OKLAHOMA

COUNTY OF OKLAHOMA

Ē.

SS:

)

VERIFICATION

I, Clifford D. McEntire, of lawful age, being first duly sworn upon oath, states:

That I am the complainant above named; that I have read the foregoing Complaint and understand the same; and the facts set forth therein are true and correct to the best of my belief and knowledge.

Chifford D. McEntire

Supscribed and sworn to before me this the 6th day of May,

Thiss G Current

ALLONIN C. My 11+ My Commission Expires: