

IN AND BEFORE THE OKLAHOMA STATE BOARD
OF MEDICAL LICENSURE AND SUPERVISION
STATE OF OKLAHOMA

FILED

STATE OF OKLAHOMA
EX REL. THE OKLAHOMA BOARD
OF MEDICAL LICENSURE
AND SUPERVISION,

Plaintiff

v.

PATRICIA MAE LINDSAY, M.D.,
LICENSE NO. 13160,

Defendant.

AUG 28 2003

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 03-04-2652

COMPLAINT

COMES NOW the plaintiff, the State of Oklahoma ex rel. the Oklahoma State Board of Medical Licensure and Supervision (the "Board"), by and through its attorney, Elizabeth A. Scott, Assistant Attorney General, and for its Complaint against the Defendant, Patricia Mae Lindsay, M.D., Oklahoma license no. 13160, alleges and states as follows:

1. The Board is a duly authorized agency of the State of Oklahoma empowered to license and oversee the activities of physicians and surgeons in the State of Oklahoma pursuant to 59 Okla. Stat. §480 *et seq.*

2. Defendant, Patricia Mae Lindsay, M.D., holds Oklahoma license no. 13160. However, Defendant has not practiced medicine in the State of Oklahoma since 1988.

3. Defendant holds no other state licenses to practice medicine.

4. Beginning on or before January 28, 2002 and continuing until June 4, 2003, Defendant wrote at least sixteen (16) prescriptions for controlled dangerous substances to Bonnie Foreman, Defendant's sister. The prescriptions include six (6) prescriptions for Dilaudid 4 mg. for 896 dosage units, four (4) prescriptions for Chlordiazepoxide 10 mg. for 400 dosage units, two (2) prescriptions for Fiorinal/Codeine #3 for 60 dosage units, three (3) prescriptions for Ritalin 10 mg. for 90 dosage units, and one (1) prescription for Alprazolam 0.5 mg. for 30 dosage units. Defendant wrote or ordered these prescriptions for Bonnie Foreman while both were

residing together in Arizona. These prescriptions were filled at various Phoenix, Arizona area pharmacies.

5. At the time Defendant issued these prescriptions to Bonnie Foreman, she did not hold an Arizona medical license, nor did she have a pending application for licensure in the State of Arizona.

6. Defendant is guilty of unprofessional conduct in that she:

- A. Engaged in dishonorable or immoral conduct which is likely to deceive, defraud, or harm the public in violation of 59 O.S. §509(9) and OAC 435:10-7-4(11).
- B. Committed any act which is a violation of the criminal laws of any state when such act is connected with the physician's practice of medicine in violation of 59 O.S. §509(10).
- C. Prescribed, sold, administered, distributed, ordered, or gave any drug legally classified as a controlled substance or recognized as an addictive dangerous drug to a family member or to himself or herself in violation of OAC 435:10-7-4(26).
- D. Violated any state or federal law or regulation relating to controlled substances in violation of OAC 435:10-7-4(27).
- E. Used her Oklahoma medical license for practice in another state, territory, district or federal facility and violated any laws in the state in which she is practicing or any federal, territorial or district laws that are in effect in the location in which she is using her Oklahoma license to practice in violation of OAC 435:10-7-4(46).

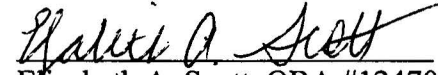
Conclusion

WHEREFORE, plaintiff requests that the Board conduct a hearing, and upon proof of the allegations contained herein, impose such disciplinary action as authorized by law, up to and including the revocation or suspension of the Defendant's license to practice as a physician and surgeon in the State of Oklahoma, the assessment of costs and fees incurred in this action, and

any other appropriate action with respect to Defendant's license to practice as a physician and surgeon in the State of Oklahoma.

Dated this 27th day of August, 2003 at 2:05 p.m.

Respectfully submitted,


Elizabeth A. Scott, OBA #12470
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Attorney for the State of Oklahoma ex rel.
Oklahoma State Board of Medical
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