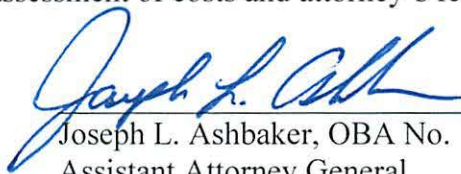


woman entering the garage and another picture showing the Range Rover leaving the residence. The Range Rover is owned by Defendant.

3. On June 16, 2015, Investigator S.W. interviewed Defendant at the Board office. During the interview, Defendant stated that A.M.L. was an employee of Digestive Disease Specialists, Inc. (“DDSI”) which is a group of physicians in the care and treatment of digestive diseases. The policy at DDSI is that all employees can receive free treatment from any of the physicians for their digestive issues. A.M.L. received two procedures from Defendant. The records reflect another physician treated A.M.L. and that she lists D.C.O., DO, as her primary care physician.
4. Investigator S.W. asked Defendant to explain why A.M.L.’s cough medicine was not in her patient chart. Defendant explained that last fall, A.M.L. and another employee had upper-respiratory infections and he authorized an antibiotic and the cough medicine for each. His nurse, who called in the prescriptions, should have placed the information in the charts, but forgot to do so.
5. Defendant admitted that he and A.M.L. had a four year relationship outside of the office which has ended. Defendant stated that A.M.L. left DDSI, acquired another job and has made no indication of being upset or bitter about the relationship or the ending of it.
6. Investigator S.W. asked Defendant if he had given A.M.L. any money on a regular basis. Defendant stated that he had given A.M.L. approximately \$5000 over the four year relationship.
7. Based on the foregoing, the Defendant is guilty of unprofessional conduct as follows:
 - a. Title 59 O.S. 2011, § 509(17) prohibiting physical conduct with a patient which is sexual in nature, or in any verbal behavior which is seductive or sexually demeaning to a patient; and
 - b. Okla. Admin. Code § 435:10-7-4(23) (2015) prohibiting the commission of any act of sexual abuse, misconduct, or exploitation related or unrelated to the licensee’s practice of medicine and surgery.

CONCLUSION

Given the foregoing, the undersigned requests 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 suspension or revocation and any other appropriate action with respect to the Defendant's professional license, including an assessment of costs and attorney's fees incurred in this action as provided by law.



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VERIFICATION

I, Steve Washbourne, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

1. I have read the above Complaint regarding the Defendant, Robert Lyon Wilson, M.D.; and
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.



Steve Washbourne, Investigator
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Date: 7-8-15

OK - County

Place of Execution