

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

**RECEIVED**

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

JAN 13 2006

OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE  
AND SUPERVISION

Plaintiff, )

v. )

Case No. 01-09-2416

LORI HANSEN, M.D., )  
LICENSE NO. 13287, )

Defendant. )

**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, Lori Hansen, M.D., 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, Lori Hansen, M.D., holds Oklahoma license no. 13287.

3. Beginning in or around January 1997 and continuing through June 2000, Defendant obtained controlled dangerous substances by fraud for her own personal use by writing fraudulent prescriptions for Hydrocodone and stealing samples of Hydrocodone from her office sample cabinet. Defendant was subsequently **SUSPENDED** by the Board on January 18, 2002 until she obtained an assessment and treatment for substance abuse at Talbott Recovery Center.

4. Defendant subsequently obtained the assessment and treatment for substance abuse and on July 18, 2002, the Board entered an Order Granting Reinstatement of License Under Terms of Probation beginning July 18, 2002, to be followed by a five (5) year term of **PROBATION**.

5. The Order Granting Reinstatement of License Under Terms of Probation sets forth Defendant's terms of probation and provides that Defendant shall be on probation as follows:

(J) Defendant will have the affirmative duty not to ingest any substance, including but not limited to alcohol, which will cause a body fluid sample to test positive for prohibited substances.

(L) Defendant will abide by the terms and recommendations of her postcare contracts with Talbott and the Physicians' Recovery Program...

(R) Defendant shall promptly notify the Board of any relapse, including any entry, or re-entry, into a treatment program for substance abuse.

6. The provisions cited above have not been modified or deleted but remain in full force and effect as terms and conditions of Defendant's probation.

7. On or about July 7, 2005, after attending two (2) support group meetings, Defendant drove to a liquor store, purchased some alcohol, and relapsed on the alcohol.

8. On July 8, 2005, Defendant was asked to provide a urine specimen to the Physicians' Recovery Program.

9. The following week, Defendant again relapsed on alcohol.

10. Defendant was subsequently notified by the Physicians' Recovery Program that she had tested positive for alcohol on the July 8, 2005 specimen.

11. Defendant did not immediately notify the Board of her two relapses, but waited until August 12, 2005 to notify Mr. Tom Sosbee, the Board Compliance and Education Coordinator, that she had relapsed over a month earlier.

12. On or about August 30, 2005, Defendant sought substance abuse treatment at the William J. Farley Center in Williamsburg, Virginia. While there, she admitted that she had self-medicated with alcohol and other drugs.

13. On or about Sept 30, 2005, Defendant left treatment against staff advice. At that time, she was advised to close her practice immediately and return to treatment. She was further advised that she should not be allowed to return to practice medicine until she successfully completed treatment at a long-term care facility.

14. At this time, Defendant has failed to obtain the treatment recommended by the Farley Center.

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

A. Habitually uses habit-forming drugs in violation 59 O.S. 407 §509(4) and OAC 435:10-7-4(3).

B. Engaged in dishonorable or immoral conduct which is likely to deceive, defraud or harm the public in violation of 59 O.S. §509(8) and OAC 435:10-7-4(11).

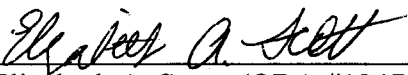
C. Violated any provision of the medical practice act or the rules and regulations of the Board or of an action, stipulation, or agreement of the Board in violation of 59 O.S. §509(13) and OAC 435:10-7-4(39).

D. Is unable to practice medicine with reasonable skill and safety to patients by reason of age, illness, drunkenness, excessive use of drugs, narcotics, chemicals or any other type of material or as a result of any mental or physician condition in violation of 59 O.S. §509(15) and OAC 435:10-7-4(40).

*Conclusion*

WHEREFORE, the Plaintiff respectfully 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 suspension or revocation and any other appropriate action with respect to Defendant's medical license, and an assessment of costs and attorney's fees incurred in this action as provided by law.

Respectfully submitted,

  
\_\_\_\_\_  
Elizabeth A. Scott (OBA #12470)  
Assistant Attorney General  
State of Oklahoma  
5104 N. Francis, Suite C  
Oklahoma City, OK 73118  
Attorney for the Plaintiff