

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

FILED

SEP 24 2010

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

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Plaintiff)

v.)

Case No. 10-09-4082

REYNALDO ADRILLANA DE LOS ANGELES,)
M.D., OKLAHOMA MEDICAL)
LICENSE NO. 13912,)

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, Reynaldo Adrillana De Los Angeles, M.D., Oklahoma medical license no. 13912, 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, Reynaldo Adrillana De Los Angeles, M.D., holds Oklahoma medical license no. 13912.

3. On or about May 12, 2010, Defendant executed an Agreed Settlement with the Division of Public Health, State of Nebraska, whereby he admitted the allegations set forth in the Petition for Disciplinary Action filed by the Nebraska Attorney General's Office and agreed that disciplinary action would be taken upon his medical license. Specifically, Defendant admitted that (a) he had transported numerous controlled dangerous substances that he had purchased to dispense to one of his medical offices where he was not registered to dispense controlled dangerous substances, (b) he did not keep records of the controlled dangerous drugs stored at any of his medical offices, and (c) he used some of the Provigil purchased to dispense to patients for

his own personal use without a valid prescription, all in violation of the Nebraska unprofessional conduct laws and rules, as well as the Uniform Controlled Substance Act.

4. On or about June 17, 2010, Defendant submitted his Application for Renewal of Oklahoma License for the period July 2, 2010 through July 1, 2011. In response to the question "Since the last renewal...have you been investigated by or requested to appear before a licensing or disciplinary agency other than the Oklahoma State Board of Medical Licensure and Supervision?" Defendant falsely answered "NO".

5. On or about July 13, 2010, Defendant was disciplined by the Division of Public Health, State of Nebraska whereby he was fined five-thousand dollars (\$5,000.00). His license was additionally restricted whereby he was not allowed to keep controlled dangerous substances on the premises of his medical practice, he was not allowed to transport controlled dangerous substances between his practice locations, and he was required to complete an ethics course pre-approved by the Nebraska Board of Medicine and Surgery.

6. Defendant is guilty of unprofessional conduct in that he:
- A. Was subject to disciplinary action of another state or jurisdiction based upon acts or conduct by the licensee similar to acts or conduct that would constitute grounds for action as defined in this section pursuant to OAC 435:10-7-4(31).
 - B. Confessed to a crime involving violation of the antinarcotic or prohibition laws and regulations of the federal government in violation of 59 O.S. § 509 (7).
 - C. 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).
 - D. 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).
 - E. 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(9).
 - F. Failed to keep complete and accurate records of purchase and disposal of controlled drugs or of narcotic drugs in violation of 59 O.S. 509(10).

- G. Violated any state or federal law or regulation relating to controlled substances in violation of OAC 435:10-7-4(27).
- H. 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).
- I. Purchased or prescribed any regulated substance in Schedule I through V, for the physician's personal use in violation of OAC 435:10-7-4(5).
- J. Engaged in fraud or misrepresentation in applying for or procuring a medical license or in connection with applying for or procuring periodic reregistration of a medical license in violation of OAC 435:10-7-4(8).

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 29th day of September, 2010 at 11:00 a.m.

Respectfully submitted,



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Oklahoma State Board of Medical
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