

5. That, as such, the defendant is in violation of 59 O.S. § 509(17) and OAC 435:10-7-4(1) and (2).

COUNT II

6. That during a period of time from approximately July, 1991, through and including January, 1994, the Defendant, Joseph C. McDaniel, prescribed schedule III and schedule IV controlled dangerous drugs to patient G.S. (See attachment "B"):

7. That the prescriptions included Apap with codeine and Propoxyphene:

8. That the prescriptions written by the defendant to patient G.S. were in excess of the amount considered good medical practice for the condition of patient G.S.:

9. That patient G.S. was addicted to controlled dangerous drugs during the time the defendant prescribed the above controlled dangerous drugs and that such prescriptions were not medically necessary for any medical conditions of patient G.S.:

10. That, as such, the defendant is in violation of 59 O.S. § 509(17) and OAC 435:10-7-4(1) and (2).

COUNT III

11. That during a period of time from approximately September, 1991, through and including December, 1993, the Defendant, Joseph C. McDaniel, prescribed schedule III, schedule IV and schedule V controlled dangerous drugs to patient L.C. (See attachment "C"):

12. That the prescriptions included Apap with codeine, Diazepam, Lorazepam, Phenobarbital and Diphenoxylate-Atropine:

13. That the prescriptions written by the defendant to patient L.C. were in excess of the amount considered good medical practice

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COUNT IV

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That the prescriptions included Meperidine Oxycodone
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WHEREFORE premi onsid red th Compl inant pr y: th Board to

conduct a hearing and upon proof of the allegations contained herein that such disciplinary action be taken by the Board as is authorized by law.

Jim Willis 0900 AM
Jim Willis, Investigator
Oklahoma Board of Medical
Licensure and Supervision

Subscribed and sworn to before me this 3 day of April, 1995.

Janet L. Owens
Notary Public

My commission expires:
12-20-96