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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,)

JAN 29 1999

Plaintiff,)

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

v.)

Case No. 98-10-2034

MICHAEL K. CRAWFORD, M.D.,)
LICENSE NO. 14749,)

Defendant.)

COMPLAINT

Plaintiff, the State of Oklahoma ex rel. the Oklahoma State Board of Medical Licensure and Supervision (the "Board"), through Jan Stratton, Investigator ("Complainant"), for its Complaint against the Defendant, Michael K. Crawford, 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, Michael K. Crawford, M.D., holds Oklahoma license no. 14749.
3. On or about March 19, 1998, Defendant used a blank pharmacy prescription pad at a local pharmacy in Edmond, Oklahoma to write himself a prescription, Rx 4801174, for 100 50mg. Didrex (benzphetamine, Schedule III). The prescription noted "Emergency Situation Dr. leaving town" and Defendant referenced the name "McCurdy" in the space for an address. Upon information and belief, the reference to "McCurdy" is to Joe McCurdy, M.D., Oklahoma medical license number 13910. Dr. McCurdy denies authorizing the March 1998 prescription.
4. Pharmacy records show that Defendant also wrote himself a prescription, Rx# 3386881, for 120 tablets of Didrex (C-III) on December 31, 1997.
5. In November 1997, Defendant had one of his office assistants call in an unauthorized prescription for Didrex (C-III) using the name of Joe McCurdy, M.D., Oklahoma medical license number 13910. Dr. McCurdy did not authorize the prescription.

6. Defendant filled the following prescriptions allegedly authorized by Dr. McCurdy at local pharmacies. Dr. McCurdy denies authorizing the following prescriptions for Defendant:

Date	Rx#	Substance	Schedule
12-10-97	3036404	Didrex 50mg #100	C-III
1-7-98	4670483	Didrex, #120	C-III

Dr. McCurdy's charts do not reflect the foregoing prescriptions but they do indicate prescriptions to Defendant for Didrex (C-III) on December 31, 1997, February 26, 1998

7. During part of this same period, Defendant was also getting Didrex (C-III) from Larry Deck, Oklahoma medical license number 16185. Dr. Deck prescribed Didrex, 50 mg., 100 tablets each (C-III), to Defendant four times from December 24, 1997 to April 7, 1998. On or around April 1998, Dr. Deck ceased prescribing for Defendant when he learned that Defendant was getting prescriptions for the same substance during that same time from Dr. McCurdy. Dr. Deck and others confronted Defendant about Defendant's possible substance abuse and contacted the Oklahoma Physician's Recovery Group.

8. Also during approximately this same period, Defendant admitted that he wrote Didrex (C-III) prescriptions to his wife and mother-in-law. Pharmacy records show that Defendant wrote at least six (6) prescriptions for Didrex (C-III) to his wife from November 1997 through October 1998 and four Schedule III controlled drug prescriptions to his mother-in-law from March 29, 1997 through January 13, 1998.

DATE	NAME	DRUG	QTY	RX #	Schedule
7/29/98	Wife	Didrex	30	3051638	III
8/28/98	Wife	Didrex	45	3053384	III
9/10/98	Wife	Didrex	30	3054215	III
10/2/98	Wife	Didrex	40	3055580	III
10/18/98	Wife	Didrex	30	3470060	III
10/19/98	Wife	Didrex	30	3056433	III

Date	Mother-in-Law	Drug	QTY	RX #	Schedule
3/29/97	M-I-L	Hydrocodone 10mg	14	34737	III
3/29/97	M-I-L	Hydrocodone 10mg	6	34737	III
12/31/97	M-I-L	Hydrocodone 10mg	40	78194	III
1/13/98	M-I-L	Didrex	100	122816	III

9. Defendant has admitted abusing Didrex (C-III) and has been assessed for possible treatment at Talbot in Atlanta, Georgia. However, Defendant declined to follow the treatment plan recommended by Talbot and elected to seek treatment on his own. Because Defendant's admitted substance abuse may impact his ability to practice medicine with reasonable skill and safety, Defendant should be required to undergo and complete full evaluation and treatment

acceptable to the Board and required to prove his ability to practice medicine with reasonable skill and safety.

10. Defendant has admitted giving prescriptions for controlled substances to two friends of Patient C, Male A and Male B, at their request, while they were present with Defendant at a golf course. Defendant did not make charts on the two men and did not examine them prior to issuing the prescriptions. The prescriptions are as follows:

Date	Rx #	"Patient"	Substance	Schedule
12/15/97	2204255	A	Oxycodone	C-II
9/2/98	2204641	B	Oxycodone	C-II
9/2/98	495733	A	Hydrocodone 10 MG	C-III
9/23/98	2204674	B	Oxycodone	C-II
9/28/98	80158	A	Hydrocodone 7.5 MG	C-III
10/8/98	81449	B	Hydrocodone 7.5 MG	C-III

11. Defendant treated his personal friend, Patient C, for narcolepsy with Desoxyn (methamphetamine, Schedule II) and Didrex (Schedule III). Despite Defendant's belief that Patient C had a drug problem and his attempt to "wean her off all of her meds". Patient C's medical chart reflects a prior diagnosis of anorexia and notations of weight loss problems but fails to substantiate a diagnosis or history of narcolepsy, which Defendant claims to have been treating Patient C. Defendant also claimed to treat Patient C with Lortab (hydrocodone C-III) for migraine headaches. Patient C's medical chart does not contain documentation to support the number of prescriptions written or authorized. Defendant prescribed the following to Patient C:

Date	Patient C	Drug	QTY	RX #	Schedule
1/13/97	Patient C	Lortab 7.5MG	75	4421547	III
2/7/97	Patient C	Lortab 7.5MG	75	4421547	III
2/23/97	Patient C	Lortab 7.5MG	75	4421884	III
3/10/97	Patient C	Lortab 7.5MG	75	4421884	III
6/19/97	Patient C	Lortab 7.5MG	50	4422786	III
8/11/97	Patient C	Phentermine	100	5383	IV
9/3/97	Patient C	Phentermine	100	5383	IV
10/9/97	Patient C	Roxicet	30	2491908	II
11/25/97	Patient C	Hydrocodone 7.5MG	75	4423800	III
12/18/97	Patient C	Hydrocodone 7.5mg	75	3504682	III
1/18/98	Patient C	Desoxyn 15mg	100	2101861	II
1/18/98	Patient C	Didrex	100	3101860	III
1/20/98	Patient C	Hydrocodone 7.5mg	50	4424154	III
2/2/98	Patient C	Didrex	100	3104882	III
2/2/98	Patient C	Hydrocodone 7.5mg	75	3104883	III
2/6/98	Patient C	Desoxyn 15mg	100	2105912	II
2/6/98	Patient C	Didrex	60	3105911	III
2/6/98	Patient C	Hydrocodone 7.5mg	30	3105913	III

Date	Name	Drug	Qty	Rx#	Schedule
2/18/98	Patient C	Hydrocodone 7.5mg	60	4424389	III
3/4/98	Patient C	Didrex	100	57229	III
3/20/98	Patient C	Desoxyn 15mg	100	2113484	II
3/20/98	Patient C	Didrex	25	58789	III
5/13/98	Patient C	Hydrocodone 7.5mg	60	4425034	III
6/26/98	Patient C	Hydrocodone 7.5mg	30	69202	III
6/26/98	Patient C	Didrex	25	58789	III
7/1/98	Patient C	Didrex	50	58789	III
7/10/98	Patient C	Hydrocodone 7.5mg	30	4425448	III
8/3/98	Patient C	Hydrocodone 7.5mg	50	110694	III
8/3/98	Patient C	Didrex	30	110695	III
8/7/98	Patient C	Hydrocodone 7.5mg	50	4425628	III
8/14/98	Patient C	Didrex	30	112757	III
8/24/98	Patient C	Didrex	30	114478	III
8/27/98	Patient C	Desoxyn 15mg	20	2139774	II
8/31/98	Patient C	Didrex	25	76470	III
9/2/98	Patient C	Alprazolam 0.5mg	30	4425805	IV
9/3/98	Patient C	Didrex	75	76470	III
9/13/98	Patient C	Hydrocodone 10mg	40	78194	III
9/16/98	Patient C	Didrex	50	3054473	III
9/23/98	Patient C	Didrex	100	4425974	III
9/23/98	Patient C	Hydrocodone 7.5mg	60	4425975	III
10/8/98	Patient C	Didrex	50	81528	III
10/10/98	Patient C	Alprazolam 0.5mg	30	4546405	IV
10/19/98	Patient C	Didrex	50	82630	III
10/30/98	Patient C	Norco 10mg	35	84264	III
10/31/98	Patient C	Hydrocodone 10mg	40	76469	III

12. Patient C's grandmother, Patient D, who was last seen by Defendant in 1995, was issued the following prescriptions by Defendant at the request of Patient C even though Defendant had not seen the grandmother and had heard that she had died while California. Patient D did, in fact, die September 18, 1998 outside the State of Oklahoma.

Date	Drug	Schedule	RX #
1/15/97	Percocet	C-II	2457433
2/24/97	Percocet	C-II	2462842
3/11/97	Percocet	C-II	2464835
3/24/97	Percocet	C-II	2466478
5/8/97	Lortab 7.5MG	C-III	4422465
5/31/97	Lortab 7.5MG	C-III	4422465
8/6/97	Lortab 7.5MG	C-III	4423092
9/9/97	Lortab 7.5MG	C-III	4423092

Date	Drug	Schedule	Rx#
10/28/97	Hydrocodone 7.5MG	C-III	4423631
11/12/97	Roxicet	C-II	2498142
11/29/97	Percocet	C-II	2204227
12/22/97	Roxicet	C-II	2505293
1/18/98	Oxycodone	C-II	2204350
7/3/98	Hydrocodone 7.5MG	C-III	4425408
8/24/98	Roxicet	C-II	2540320
8/31/98	Hydrocodone 10MG	C-III	4425779
9/12/98	Roxicet	C-II	78153
9/16/98	Hydrocodone 7.5MG	C-III	3142784
9/23/98	Oxycodone	C-II	2204671
10/3/98	Hydrocodone 7.5MG	C-III	4426063

13. Defendant is guilty of unprofessional conduct in that he:

A. Habitually uses habit-forming drugs in violation 59 Okla. Stat. §509(5) and OAC 435:10-7-4(3).

B. Confessed to a crime involving a violation of the anti-narcotic laws of the federal government or the laws of this state in violation of 59 Okla. Stat. §509(8) and 63 Okla. Stat. §2-406 and §2-407.

C. Committed an 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 50 Okla. Stat. §509(10).

D. Wrote false or fictitious prescriptions for any drugs or narcotics declared by the laws of this state to be controlled or narcotic drugs in violation of 59 Okla. Stat. §509(12).

E. Prescribed a drug without sufficient examination and the establishment of a valid physician patient relationship in violation of 59 Okla. Stat. §509(13).

F. 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 Okla. Stat. §509(16) and OAC 435:10-7-4 (3), (17) and (40).

G. Prescribed a controlled substances without medical need in accordance with published standards in violation of 59 Okla. Stat. § 509(17) and OAC 435:10-7-4(2) and (6).

H. Failed to maintain an office record for each patient which accurately reflects the evaluation, treatment, and medical necessity of treatment of the patient in violation of 59 Okla. Stat. §509(19).

I. Indiscriminate or excessive prescribing of controlled or narcotic drugs in violation of OAC 435:10-7-4(1).

J. Purchased or prescribed a regulated substance in Schedules I through V for the physician's personal use in violation of OAC 435:10-7-4(5).

K. Used a false, fraudulent or deceptive statement in a document connected with the practice of medicine and surgery in violation of OAC 435:10-7-4(19).

L. Prescribed, ordered, or gave to a habitue or addict any drug legally classified as a controlled substance or recognized as an addictive or dangerous drug in violation of OAC 435:10-7-4(25).

M. Prescribed, sold, administered, distributed, ordered or gave a 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).

N. Violated a state or federal law or regulation relating to controlled substances in violation of OAC 435:10-7-4(27), 63 Okla. Stat. §2-406 and §2-407 and OAC 475:20-1-2, OAC 475:20-1-6, OAC 475:25-1-3 and OAC 475:30-1-3.

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