

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

STATE OF OKLAHOMA

STATE OF OKLAHOMA, ex rel,
OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE AND
SUPERVISION,)

Plaintiff,)

v.)

GARY A. PARKISON, M.D.
Medical License No. 15420,)

CASE NO. 91-10-1243

Defendant)

COMPLAINT

COMES NOW Jim Birdsong, Investigator for the Oklahoma State Board of Medical Licensure and Supervision, being first duly sworn upon oath and states

1. That Gary A. Parkison, M.D., holding Oklahoma Medical License No. 15420, is in violation of the Oklahoma Medical Practice Act, 59 O.S. 1981, Sec. 509, Paragraphs 1, 10, 12, and 17, to-wit:

- "1. Procuring, aiding or abetting a criminal operation."
- "10. The commission of any act which is a violation of the criminal laws of Oklahoma when such act is connected with the physician's practice of medicine."
- "12. The writing of false or fictitious prescriptions for any drugs or narcotics declared by the laws of Oklahoma to be controlled or narcotic drugs."
- "17 Prescribing, dispensing or administering of controlled substances or narcotic drugs in excess of the amount considered good medical practice, or prescribing, dispensing or administering controlled substances or narcotic drugs without medical need in accordance with published standards."

That Gary A. Parkison, M.D., is in violation of the Rules and Regulations promulgated by this Board, specifically Sec. X, Rules 1A, B, and F, to-wit:

- "Rule A: Indiscriminate or excessive prescribing, dispensing or administering of controlled or narcotic drugs."
- "Rule B: Prescribing, dispensing or administering of controlled or narcotic drugs in excess of the amount considered good medical practice."

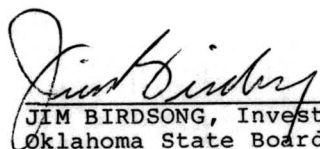
"Rule F: Dispensing, prescribing or administering a controlled substance or narcotic drug without medical need."

3 That from approximately October 1, 1990, to October 1, 1991, Defendant did write numerous prescriptions for Mepergan Fortis, a Schedule II controlled dangerous substance, for patient K.L.M. and prescriptions were written by the Defendant in the name of K.L.M., her spouse M.M., and former spouse T.L., in an effort to disguise the dosage units truly written for patient K.L.M.

4. That on at least two occasions Defendant prescribed Mepergan Fortis to patient K.L.M. and same was not reflected on her patient records in an effort to disguise the total amount of medication prescribed to K.L.M.

5. That Defendant is perpetuating significant harm to public health, safety and welfare by continuing the acts and omissions set forth in the above allegations.

WHEREFORE, Complainant prays this 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 BIRDSONG, Investigator
Oklahoma State Board of
Medical Licensure and Supervision

Subscribed and sworn to before me this 26th day of December, 1991.



Notary Public

My Commission expires:
January 16, 1995