

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

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

**Plaintiff,**

v.

**RICHARD LEE CAMPBELL, M.D.,  
LICENSE NO. 15908,**

**Defendant.**

**FILED**  
**JUN 10 2011**  
**OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE & SUPERVISION**

**Case No. 10-09-4089**

**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, Richard Lee Campbell, 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, Richard Lee Campbell, M.D., holds Oklahoma license no. 15908 and at the time of the incidents in question, practiced family medicine at Wichita Mountain Medical in Lawton, Oklahoma.
4. In September 2010, Board Investigators received information that Defendant was leaving blank pre-signed prescriptions in his office for use by his employees, and that an employee was using these pre-signed prescriptions to give herself and a friend controlled dangerous substances without Defendant's permission. When questioned by Board Investigators, Defendant admitted that he does leave pre-signed prescriptions in his office for the use of his nurse practitioner and his nursing staff to "increase efficiency", so that he would not have to stop and sign prescriptions during the day.
5. As a result of this practice, Defendant's PA, Sallee LaFave, PA1661, was able to prescribe Xanax, Ambien and Phentermine to herself on eight (8) occasions on the pre-signed prescriptions without Defendant's permission.

6. PA LaFave additionally was able to prescribe Phentermine to her friend, Patient LRD, on two (2) occasions by utilizing Defendant's pre-signed prescriptions and giving them to her friend. Patient LRD was never a patient of either Defendant or PA LaFave. The prescriptions given to Patient LRD were given without the knowledge or consent of Defendant.

7. Title 21 CFR §1306.05 provides as follows:

**Manner of issuance of prescriptions.**

(a) All prescriptions for controlled substances shall be dated as of, and signed on, the day when issued and shall bear the full name and address of the patient, the drug name, strength, dosage form, quantity prescribed, directions for use, and the name, address and registration number of the practitioner.

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

- A. 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).
- B. 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).
- C. Confessed to a crime involving violation of the antinarcotic or prohibition laws and regulations of the federal government or the laws of this state in violation of 59 O.S. §509(7).
- D. Violated any state or federal law or regulation relating to controlled substances in violation of OAC 435:10-7-4(27).
- E. Aided or abetted, directly or indirectly, the practice of medicine by any person not duly authorized under the laws of this state in violation of 59 O.S. §509(14) and OAC 435:10-7-4(21).
- F. 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).

*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,



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