

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.

JOHN DAVID JENNINGS, M.D.
Medical License No. 15971,

CASE NO. 89-01-773

Defendant.

COMPLAINT

COMES NOW J.G. Landreth, Investigator for the Oklahoma State Board of Medical Licensure and Supervision, being first duly sworn upon oath and states:

That John David Jennings, M.D., holding Oklahoma Medical License No. 15971, is in violation of the Oklahoma Medical Practice Act, 59 O.S. Supp. 1988, Sec. 508, to-wit:

"Whenever any license or certificate has been procured or obtained by fraud or misrepresentation...it shall be the duty of the State Board of Medical Licensure and Supervision to revoke such license or certificate in the same manner as is provided by this Act for the revocation of license or certificate for unprofessional conduct."

2. That on or around March 28, 1986, Defendant made application for Oklahoma license as a physician and surgeon. In response to item number 3 on his application, Defendant made the following responses to the following questions, to-wit:

"Have you ever been charged with or convicted of a felony? No."

"Has your license ever been revoked or have you ever been the subject of disciplinary action by a licensing agency? No."

3. That on or around June 14, 1988, Defendant submitted his Application for Renewal of Oklahoma Medical License. He provided the following response to the following question, to-wit:

"Have you ever been the subject of disciplinary action by any Governmental or Licensing Authority, federal, state or local? If "yes" explain briefly. (Answer) None."

4. That in early 1982 Defendant was licensed as a Physician's Assistant by the Louisiana State Board of Medical Examiners. Information received by the Louisiana Board indicated that the Defendant "overstepped the limitations of the Physician's Assistant Practice Act and was practicing medicine." In May, 1982, Defendant met personally with the Louisiana Board to discuss the allegations. Following Defendant's appearance, the Board ordered a formal hearing on the matter. In June, 1982, Defendant voluntarily surrendered his Louisiana Physician's Assistant License in order to avoid a disciplinary hearing on same.

5. That on or around July 8, 1983, Defendant was arrested in Casored, California, and charged with forging a name on a credit card and theft by use of a credit card

6. That on or around November 23, 1983, Defendant was arrested in San Francisco, California, and charged with theft by forged or invalid credit card and unlawful use of a credit card acquired without consent.

That on or around December 19, 1983, Defendant was arrested in Milford, Connecticut, and charged with criminal impersonation and illegal use of a credit card

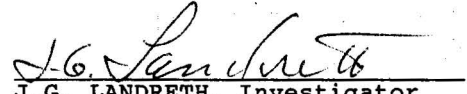
8. That on or around June 26, 1984, Defendant pled guilty to criminal impersonation and two counts of illegal use of a credit card and was sentenced to one and one-half years imprisonment which was suspended, and two years probation.

9. That on or around January 1, 1984, Defendant was arrested in Derby, Connecticut, and charged with unlawful transferring and use of a credit card.

10. That on or around May 21, 1986, the Alabama State Board of Medical Examiners denied the Defendant's application for limited license as a physician and surgeon. During the subsequent appeal of the Board's decision, Defendant voluntarily entered into a Consent Agreement wherein the Alabama Board agreed to issue a limited license under certain enumerated conditions and restrictions. A copy of the Consent Agreement dated August 27, 1986, is attached hereto and marked Exhibit A. That on or

around September 23, 1987, Defendant requested that the Alabama Board lift all restrictions on his limited license. The Alabama Board denied Defendant's application. A copy of the Alabama Board's Minutes and Order are attached hereto and marked Exhibits B and C.

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.


J.G. LANDRETH, Investigator
State Board of Medical Licensure
and Supervision

Subscribed and sworn to before me this 10th day of April, 1989.


Notary Public

My Commission expires:
10-7-90