

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.	)	
	)	
LAWRENCE HENRY TROMBKA, M.D.	)	CASE NO. 91-08-1208
Medical License No. 16300,	)	
	)	
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 Lawrence Henry Trombka, M.D., holding Oklahoma Medical License No. 16300, is in violation of the Oklahoma Medical Practice Act, 59 O.S. 1981, Sec. 509, Paragraphs 6 and 10, to-wit:

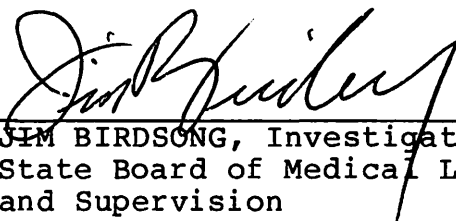
"6. Conviction of a felony or of any offense involving moral turpitude."

"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."

2. That on or around August 2, 1991, Defendant was found guilty of the felony crime of Medicaid Fraud in Oklahoma County Case No. CF-91-3982, and received a three-year suspended sentence and \$10,000.00 fine.

3. That Respondent was perpetuating significant harm to public health, safety and welfare by committing the acts and omissions contained in the above criminal allegations by making false claims upon the Oklahoma Medicaid Program which resulted in criminal information alleging that the Defendant had caused the Oklahoma Medicaid Program to pay him at least \$75,000.00 more than he was entitled to receive for professional services.

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.

  
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JIM BIRDSONG, Investigator  
State Board of Medical Licensure  
and Supervision

Subscribed and sworn to before me this 7th day of September, 1991.

  
\_\_\_\_\_  
Notary Public

My Commission expires:  
January 16, 1995