

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

FILED

JUL - 3 2024

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

STATE OF OKLAHOMA, *ex rel.*)
OKLAHOMA STATE BOARD)
OF MEDICAL LICENSURE)
AND SUPERVISION,)
)
Plaintiff,)
)
v.)
)
THOMAS RAY CROW, M.D.,)
LICENSE NO. MD 16480,)
)
Defendant.)

Case No. 24-01-6293

VERIFIED COMPLAINT

The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision ("Board"), for its Verified Complaint against Thomas Ray Crow, M.D. ("Defendant"), alleges and states as follows:

I. JURISDICTION

1. The Board has jurisdiction over the subject matter and 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. 59 O.S. § 480, *et seq.* and Okla. Admin. Code 435:5-1-1, *et seq.*
2. Defendant holds medical license No. 16480, issued 07/01/1988 by the Oklahoma State Board of Medical Licensure and Supervision. The acts and/or omissions complained of herein occurred while Defendant was licensed by and in the State of Oklahoma.

II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

3. This action arises out of unprofessional conduct by Defendant as detailed herein. The Board originally received a complaint from the medical director of an addiction recovery center concerning the dosage of controlled dangerous substance prescriptions regarding a particular patient.
4. Based on these concerns, Board staff subpoenaed medical records for seven (7) of Defendant's patients, including the subject of the complaint and one recently deceased patient. Upon receipt of the same all were provided to an expert for review. The expert determined that for at least four (4) patients Defendant's treatment and prescription patterns demonstrated concerning practices. Specifically, Defendant was determined to have prescribed various narcotics and benzodiazepines concurrently, including excessive daily

Morphine Milliequivalent (MME) for opioids with no evidence of down-titration, and despite at least one circumstance involving known history of substance use dependence and/or misuse/disorder, and in some instances known or demonstrated fall risk to a patient(s). Compounding this misconduct, Defendant failed to conduct or recommend concomitant psychiatric assessment which would have comported with the relevant standard of care for patients under the above-described conditions. Accordingly, the expert determined that these practices were inconsistent with or in violation of the appropriate practice standard(s).

III. VIOLATIONS

5. Based on the foregoing, Defendant is guilty of unprofessional conduct as follows:
- a. Prescribing, dispensing or administering of controlled substances or narcotic drugs in excess of the amount considered good medical practice, in violation of 59 O.S. 509(16)(a) and Okla. Admin. Code § 435:10-7-4(2).
 - b. Indiscriminate or excessive prescribing, dispensing or administering of controlled or narcotic drugs, in violation of Okla. Admin. Code § 435:10-7-4(1).
 - c. Prescribing or administering a drug or treatment without sufficient examination and the establishment of a valid physician-patient relationship and not prescribing in a safe, medically accepted manner, in violation of 59 O.S. 509(12).
 - d. Failure 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 O.S. § 509(18).
 - e. Failure to maintain adequate medical records to support diagnosis, procedure, treatment or prescribed medications, in violation of 59 O.S. § 509(21) and Okla. Admin. Code § 435:10-7-4(41).

V. CONCLUSION

Given the foregoing, the undersigned respectfully requests 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 professional license, including an assessment of costs and attorney's fees incurred in this action as provided by law.

Respectfully submitted,



Alex A. Pedraza, OBA No. 33584
Assistant Attorney General
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

101 N.E. 51st Street
Oklahoma City, Oklahoma 73105
Telephone: 405.522.5264
Email: Alex.Pedraza@oag.ok.gov

VERIFICATION

I, Melissa Davis, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

1. I have read the above Complaint regarding Thomas Ray Crow, M.D.; and
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.

Melissa Davis, RN
Melissa Davis, RN, Investigator
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Date: *7/3/2024*

Oklahoma County, Oklahoma
County, State of Execution