

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

FILED

STATE OF OKLAHOMA)
EX REL. THE OKLAHOMA BOARD)
OF MEDICAL LICENSURE)
AND SUPERVISION,)
)
Plaintiff,)
)
v.)
)
WILLIAM DALE WRIGHT, M.D.,)
LICENSE NO. 16990,)
)
Defendant.)

DEC 19 2008

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 08-08-3552

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, William Dale Wright, 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, William Dale Wright, M.D., holds Oklahoma license no. 16990 and practices internal medicine in Oklahoma City, Oklahoma.

3. In or around 2002, Defendant completed approximately fourteen (14) weeks of inpatient treatment for alcohol abuse at Talbott.

4. In or around 2003, Defendant relapsed on alcohol and completed approximately seven (7) weeks of inpatient treatment for alcohol abuse at Rush.

5. In or around 2005, Defendant again relapsed on alcohol and completed approximately ten and one-half (10 ½) weeks of inpatient treatment at Farley. While at Farley, Defendant was asked to leave the facility due to an inappropriate relationship with a fellow patient. Upon leaving Farley, Defendant spent six (6) months in a halfway house in North Carolina.

6. In or around August 2008, Defendant tested positive for alcohol on a drug test administered by the Oklahoma Health Professionals Recovery Program. Defendant later admitted that he had been ingesting alcohol.

8. From August 19, 2008 until October 31, 2008, Defendant obtained treatment at Santé Center for Healing.

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

A. Habitually uses habit-forming drugs in violation 59 O.S. §509(4) and OAC 435:10-7-4(3).

B. 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).

C. 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).

D. Is unable to practice medicine with reasonable skill and safety to patients by reason of age, illness, drunkenness, excessive use of drugs, narcotics, chemicals or any other type of material or as a result of any mental or physician condition in violation of 59 O.S. §509(15) and OAC 435:10-7-4(40).

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.

Dated this 19th day of December, 2008.

Respectfully submitted,

Elizabeth A. Scott

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