

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,)

SEP 23 2011

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Plaintiff,)

v.)

Case No. 11-03-4191

RICHARD DOUGLAS RANNE, M.D.,)
LICENSE NO. 17126,)

Defendant.)

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 Douglas Ranne, 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 Douglas Ranne, M.D., holds Oklahoma license no. 17126 and at the time of the events in question, practiced as a general surgeon in Tulsa, Oklahoma.

3. On or about November 3, 2008, a malpractice claim relating to a heart surgery performed by Defendant was settled in the amount of \$150,000.00.

4. On or about August 24, 2009, Defendant submitted his Application for Renewal of Oklahoma License for the period October 2, 2009 through October 1, 2010. On his Application for Renewal, Defendant was asked the following question: "Since the last renewal....[h]ave you had any adverse judgment, settlement, or award against you arising from a professional liability claim?" In response to this question, Defendant answered "NO". Defendant was also asked the following question: "Since the last renewal...[h]ave you been reported to the National Practitioner Data Bank (NPDB) or to the Healthcare Integrity and Protection Data Bank (HIPDB)?" In response to this question, Defendant answered "NO". Defendant had in fact settled a professional liability claim and was reported to the NPDB during this time.

5. Beginning on or about April 30, 2010 and continuing through May 27, 2010, Defendant was suspended from practice at Saint Francis Hospital in Tulsa, Oklahoma.

6. On or about May 26, 2010, Defendant faxed a portion of the Texas Standardized Credentialing Application to Covenant Health System in Lubbock, Texas so as to obtain privileges. On "Hospital Addendum J", Defendant was asked the question "Have you ever been the subject of disciplinary proceedings or placed under monitoring or supervision at any hospital or health care facility?" In response to this question, Defendant answered "No". Defendant was also asked the following question: "Has your employment, clinical privileges or Medical Staff membership at any hospital or other healthcare institution ever been refused, voluntarily or involuntarily terminated, surrendered, or subject to voluntary or involuntary limitation, reduction or loss of clinical privileges? (for reasons other than non-completion of medical records when quality of care was not adversely affected)." In response to this question, Defendant answered "No". On that date, Defendant was still suspended by St. Francis Hospital.

7. On or about August 19, 2010, Defendant submitted his Application for Renewal of Oklahoma License for the period October 2, 2010 through October 1, 2011. On his Application for Renewal, Defendant was asked the following question: "Since the last renewal...[h]ave you been denied or had removed or suspended hospital staff privileges?" In response to this question, Defendant answered "NO". Defendant had in fact been suspended at St. Francis Hospital just three (3) months earlier.

8. On or about November 11, 2010, Defendant submitted his Application for Renewal of his Arizona Medical License. On his Application for Renewal, Defendant was asked the following question: "Since your last renewal have you been the subject of disciplinary action or are you currently under investigation with regard to your healthcare license (other than by the Arizona Medical Board), have you been sanctioned by any healthcare licensing authority, healthcare association, licensed healthcare facility or healthcare staff of such facility?" In response to this question, Defendant answered "NO". Defendant was additionally asked the following question: "Since your last renewal have your privileges been restricted, terminated, voluntarily or involuntarily resigned or withdrawn by any healthcare licensing authority, healthcare association, licensed healthcare facility or healthcare staff of such facility?" In response to this question, Defendant answered "NO". Defendant had in fact been suspended at St. Francis Hospital just five (5) months earlier.

9. On or about December 6, 2010, Defendant submitted his Application for Renewal of his Missouri Medical License. On his Application for Renewal, Defendant was asked the following question: "During the past 12 months, have you had any disciplinary or corrective action taken against you, or had your right to practice restricted, by any professional medical or osteopathic association or society, or by an licensed hospital or medical staff of a hospital?" In response to this question, Defendant answered "NO". Defendant had in fact been suspended at St. Francis Hospital just seven (7) months earlier.

10. Defendant is guilty of unprofessional conduct in that he:
- A. Engaged in 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. 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).
 - C. Engaged in the use of any false, fraudulent, or deceptive statement in any document connected with the practice of medicine and surgery in violation of OAC 435:10-7-4(19).
 - D. Engaged in fraud or misrepresentation in applying for or procuring a medical license or in connection with applying for or procuring periodic reregistration of a medical license in violation of OAC 435:10-7-4(8).
 - E. Failed to furnish the Board, its investigators or representatives, information lawfully requested by the Board in violation of OAC 435:10-7-4(37).

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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