

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.)
)
CHARLES ALAN LESTER, M.D.)
LICENSE NO. MD 17326,)
)
Defendant.)

FILED

JAN 25 2022

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 21-04-5988

VERIFIED COMPLAINT

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

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. In Oklahoma, Defendant holds medical license No. 17326.
3. The acts and omissions complained of herein were made while Defendant was licensed to practice medicine by the State of Oklahoma.

II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

4. Based on review of 10 patient charts, some spanning a treatment period of approximately 20 years, Defendant has been grossly or repeatedly negligent in his treatment of patients in regard to treatment and prescribing, monitoring, and documentation.
5. Defendant improperly managed medical records and/or maintained inadequate or inadequate records to accurately document and support his treatment of patients.

6. Defendant indiscriminately or excessively prescribed controlled substances to patients and practiced (often long-term) polypharmacy without adequate regard for dosing and/or interactions with other substances, including controlled substances.

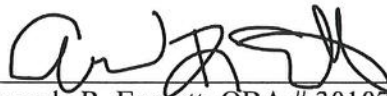
III. VIOLATIONS

7. Based on the foregoing, **CHARLES ALAN LESTER, M.D.**, is guilty of unprofessional conduct as follows:
- a. Prescribing, dispensing or administering of controlled substances or narcotic drugs indiscriminately or in excess of the amount considered good medical practice or without medical need in accordance with published standard, in violation of Okla. Stat. tit. 59 § 509(16)(a) and Oklahoma Administrative Code 435:10-7-4(1) and (2).
 - b. Failure to maintain an office record for each patient which accurately reflects the evaluation, treatment, and medical necessity of treatment of the patient, or improper management of medical records, in violation of Okla. Stat. tit. 59 § 509(18) and Oklahoma Administrative Code 435:10-7-4(36).
 - c. Gross or repeated negligence in the practice of medicine, in violation of Oklahoma Administrative Code 435:10-7-4(15).

IV. CONCLUSION

Given the foregoing, the undersigned respectfully request the Board to conduct a hearing, and upon proof of the allegation(s) contained herein, impose an appropriate punishment pursuant to the applicable law and rule on **CHARLES ALAN LESTER M.D.**, including an assessment of costs and attorneys' fees incurred in this action as provided by law.

Respectfully submitted,




Amanda R. Everett, OBA # 30107
Assistant Attorney General
OKLAHOMA STATE BOARD OF MEDICAL
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VERIFICATION

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

1. I have read the above Complaint regarding **CHARLES ALAN LESTER, M.D.** and,
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.



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

Executed this 7th day of January, 2022, in Oklahoma County, State of Oklahoma.