

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

**STATE OF OKLAHOMA
EX REL. THE OKLAHOMA BOARD
OF MEDICAL LICENSURE
AND SUPERVISION,**

Plaintiff

v.

**STEPHEN LESTER GREER, M.D.,
LICENSE NO. 17372,**

Defendant.

FILED

JUN - 3 2004

**OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION**

Case No. 04-02-2769

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, Stephen Lester Greer, M.D., Oklahoma license no. 17372, 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, Stephen Lester Greer, M.D., holds Oklahoma license no. 17372 and is a practicing psychiatrist in Broken Arrow, Oklahoma.

3. Beginning on or around May 15, 2003 and continuing through February 2004, Patient DHW was a patient of Defendant. During this time, Defendant engaged in physical conduct with Patient DHW which was sexual in nature. Defendant engaged in the sexual conduct in his office, at a motel in Broken Arrow, Oklahoma paid for by Defendant, and in his car. Defendant engaged in these sexual acts at the same time that he was maintaining a doctor-patient relationship and prescribing controlled dangerous substances to this patient.

4. During the time that Defendant was treating Patient DHW and was engaging in physical conduct with Patient DHW which was sexual in nature, Defendant allegedly "employed" Patient DHW in his office. Defendant allowed Patient DHW to work off her bill by copying other psychiatric patients' charts and doing other work around the office. Defendant

engaged in these acts at the same time that he was maintaining a doctor-patient relationship and prescribing controlled dangerous substances to this patient.

5. During the time that Defendant was treating Patient DHW and was engaging in physical conduct with Patient DHW which was sexual in nature, Defendant paid for a motel for three (3) weeks for Patient DHW and her son. During this time, he frequently visited Patient DHW at the motel.

6. Beginning on or around May 29, 2003 and continuing through February 4, 2004, Defendant prescribed controlled dangerous substances to Patient DHW. A review of Defendant's chart on this patient reveals that Defendant failed to keep any records of the prescribing or ordering of these controlled dangerous substances after October 15, 2003.

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

- A. Engaged in dishonorable or immoral conduct which is likely to deceive, defraud or harm the public in violation of 59 O.S. § 509 (9) and OAC 435:10-7-4 (11).
- B. Engaged in physical conduct with a patient which is sexual in nature, or in any verbal behavior which is seductive or sexually demeaning to a patient in violation of 59 O.S. §509 (18).
- C. Committed an act of sexual abuse, misconduct or exploitation related or unrelated to the licensee's practice of medicine and surgery in violation of OAC 435:10-7-4 (23).
- D. Abused the physician's position of trust by coercion, manipulation or fraudulent representation in the doctor-patient relationship in violation of OAC 435:10-7-4(44).
- E. 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 OAC 435:10-7-4(39).
- F. Failed 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 (19).
- G. Violated any state or federal law or regulation relating to controlled substances in violation of OAC 435:10-7-4(27).

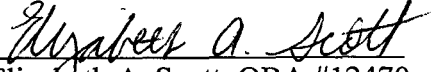
- H. Engaged in predatory sexual behavior in violation of OAC 435:10-7-4(45).

Conclusion

WHEREFORE, plaintiff 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 the revocation or suspension of the Defendant's license to practice as a physician and surgeon in the State of Oklahoma, the assessment of costs and fees incurred in this action, and any other appropriate action with respect to Defendant's license to practice as a physician and surgeon in the State of Oklahoma.

Dated this 3rd day of June, 2004 at 2:30 p.m.

Respectfully submitted,


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Oklahoma State Board of Medical
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