

**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.

**RICHARD DAVID ZUJKO, M.D.,
OKLAHOMA MEDICAL LICENSE NO. 17580,**

Defendant.

JUN - 3 2004

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 04-05-2806

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 David Zujko, M.D., Oklahoma medical license no. 17580, 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 David Zujko, M.D., holds Oklahoma medical license no. 17580.

3. On or about February 2, 2004, the Board of Registration for the Healing Arts for the State of Missouri and the Defendant entered into a Settlement Agreement whereby Defendant's medical license was **REVOKED**. The Missouri Board further ordered that Defendant could not apply for reinstatement in Missouri for a minimum of seven (7) years. The discipline imposed by Missouri was based upon Defendant's care and treatment of twelve (12) patients where there were adverse medical liability claim settlements. Defendant additionally admitted that he was not currently capable of practicing medicine with reasonable skill and safety.

4. On or about February 2, 2004, the Kansas State Board of Healing Arts and the Defendant entered into a Consent Order whereby Defendant's medical license was **REVOKED**. The Kansas Board further ordered that Defendant could not apply for reinstatement in Kansas for

three (3) years and that in the event he applies for reinstatement, the allegations contained in the Second Amended Complaint would be considered as findings of fact and conclusions of law. The discipline imposed by Kansas was based upon Defendant's care and treatment of eleven (11) patients where there were adverse medical liability claim settlements.


5. Defendant is guilty of unprofessional conduct in that he:
 - A. Was subject to disciplinary action of another state or jurisdiction based upon acts or conduct by the licensee similar to acts or conduct that would constitute grounds for action as defined in this section pursuant to OAC 435:10-7-4(31).
 - B. Is physically or mentally unable to practice medicine and surgery with reasonable skill and safety in violation of OAC 435:10-7-4(17).

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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Attorney for the State of Oklahoma ex rel.
Oklahoma State Board of Medical
Licensure and Supervision