

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

MARTHA ANNE McKNIGHT, M.D.
Medical License No. 17877,

CASE NO. 92-01-1284

Defendant.

COMPLAINT

COMES NOW Jim Birdsong, Investigator for the Oklahoma State Board of Medical Licensure and Supervision, being first duly sworn upon oath and states:

1. That Martha Anne McKnight, M.D., holding Oklahoma Medical License No. 17877, is in violation of the Oklahoma Medical Practice Act, 59 O.S. 1981, Sec. 509, Paragraph 16 to-wit:

"16. Inability 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 physical condition."

2. That on or around July 12, 1991, Defendant did execute a Voluntary Submittal to Jurisdiction agreeing to a five-year probation under certain enumerated terms and conditions, and that said Voluntary Submittal to Jurisdiction was executed as part of her application for Supervised Medical Doctor.

3. That at its meeting of October 5, 1991, the Board did issue Oklahoma medical license to the Defendant under terms of probation enumerated in the Board Order announced at its meeting of October 5, 1991, and signed by Board Secretary Gerald C. Zumwalt, M.D., on October 10, 1991

4. That the probationary terms and conditions are still in full force and effect and have not been modified or altered by the Board

5. That the Defendant practiced medicine and surgery as an Assistant Professor at the University of Oklahoma College of Medicine in the Department of Psychiatry and Behavioral Sciences.

That on or around January 10, 1992, Defendant was relieved of all duties by the Professor and Chairman of the Department, Joseph Westermeyer, M.D., Ph.D., as set forth in his letter of January 10, 1992. A copy of that letter is attached hereto and marked as Exhibit A

That the Defendant voluntarily admitted herself to St John Medical Center, Tulsa, Oklahoma, under the care of John C. Chelf, M.D., Board Certified Psychiatrist and Certified Addictionologist. That following the issuance of lawful subpoenas, on February 18, 1992, the Board staff received a narrative report from Dr. Chelf on the history and condition of the Defendant. A copy of that narrative report is attached hereto and marked as Exhibit B.

8. Dr. Chelf's report indicates that Defendant is still experiencing some difficulty and that Dr. Chelf does not "feel comfortable in returning her to work."

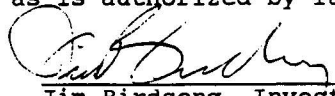
9. That the evidence indicates that public health, safety and welfare imperatively requires emergency action to suspend Defendant's Oklahoma medical license until a full hearing is held on the merits of this case

10. That absent emergency action by the Board, Defendant would be in a position to perpetuate significant harm to public health, safety and welfare by continuing acts and omissions set forth in the above allegations.

11. That on February 20, 1992, Defendant and her attorney Henry Nichols, Looney, Nichols, Johnson & Hayes, received oral notice of this hearing when they visited with the Board Secretary and were advised that formal notice would follow.

WHEREFORE, Complainant prays this Board to conduct an emergency hearing and a subsequent hearing on the merits and upon

proof of the allegations contained herein that such disciplinary action be taken by the Board as is authorized by law.



Jim Birdsong, Investigator
Oklahoma State Board of
Medical Licensure and Supervision

Subscribed and sworn to before me this 24 day of
February, 1992.



Notary Public

My Commission expires:
12-17-92