

**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. )  
 )  
EDWARD DUANE JONES, M.D., )  
LICENSE NO. 18051, )  
 )  
Defendant. )

**FILED**

JAN 27 2012

OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE & SUPERVISION

Case No. 11-12-4448

**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, Edward Duane Jones, M.D., alleges and states as follows:

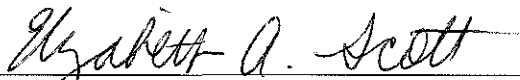
1. The Board is a duly authorized agency of the State of Oklahoma empowered to license and oversee the activities of physicians and surgeons in the State of Oklahoma pursuant to 59 Okla. Stat. §480 *et seq.*
2. Defendant, Edward Duane Jones, M.D., holds Oklahoma license no. 18051 and practices ophthalmology in Oklahoma City, Oklahoma.
3. From February 1, 2005 until March 26, 2005, Defendant submitted to inpatient treatment for alcohol dependence at Talbott Recovery Campus in Atlanta, Georgia.
4. Upon discharge from Talbott, he signed a contract with and was monitored by the Oklahoma Health Professionals Program from April 2005 until April 2010, at which time he was discharged from the program.
5. Shortly after completing his contract with the OHPP, Defendant relapsed on alcohol. He returned to treatment and completed thirty (30) days of inpatient treatment from October 8, 2011 until November 6, 2011 at The Retreat in Minnesota for alcohol abuse. Upon returning from The Retreat, Defendant executed a monitoring contract with the Oklahoma Health Professionals Program.

6. Defendant is guilty of unprofessional conduct in that he:
- A. Habitually uses habit-forming drugs in violation 59 O.S. 407 §509(4) and OAC 435:10-7-4(3).
  - B. Engaged in dishonorable or immoral 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).
  - C. 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).
  - D. Is unable 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 physician condition in violation of 59 O.S. §509(15) and OAC 435:10-7-4(40).

*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,



Elizabeth A. Scott (OBA #12470)

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Attorney for the Plaintiff