

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

**FILED**

AUG 10 2011

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

OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE & SUPERVISION

Plaintiff, )

v. )

Case No. 11-02-4174

CHRISTIAN ERICK KAUFMAN, M.D., )  
LICENSE NO. 18421, )

Defendant. )

**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, Christian Erick Kaufman, 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, Christian Erick Kaufman, M.D., holds Oklahoma license no. 18421 and practices internal medicine at the University of Oklahoma Health Sciences Center in Oklahoma City, Oklahoma.

**ALCOHOL ABUSE**

3. In or around 2001, Defendant was practicing in Springfield, Missouri. During this time, he began to abuse alcohol on a regular basis. Clinic staff confronted him about his alcohol abuse and the fact that he had missed work due to hangovers. Defendant contacted the Missouri Health Professionals Recovery Program and agreed to go to treatment for alcohol abuse.

4. Beginning in January 2002, Defendant submitted to treatment for alcohol abuse at Talbott for approximately six (6) months. Upon his release, he entered into a five (5) year contract with the Missouri Health Professionals Recovery Program.

5. Approximately one (1) year after completing his contract with the Missouri Health Professionals Recovery Program, Defendant relapsed on alcohol.

6. Defendant continued to abuse alcohol for the next two (2) years until he was again confronted by clinic staff in March 2010. At that time, he had been drinking while on call and had missed call because of his drinking.

7. After being confronted by clinic staff, Defendant admitted that he had relapsed and he re-affiliated with the Missouri Health Professionals Recovery Program. However, he continued to abuse alcohol.

### **FRAUDULENT REINSTATEMENT APPLICATION**

8. In or around July 2010, Defendant resigned his position in Springfield and moved to Oklahoma to begin employment at the University of Oklahoma Health Sciences Center.

9. On or about August 18, 2010, Defendant submitted his Application for Reinstatement of Oklahoma License. On his Application for Reinstatement, Defendant was asked the following question: "Are you now or have you within the past two years been addicted to or used in excess any drug or chemical substance, including alcohol?" In response to this question, Defendant answered "NO". Defendant has admitted that he had relapsed and was still abusing alcohol during this time.

10. On his August 18, 2010 Application for Reinstatement, Defendant was also asked the following question: "Have you obtained an assessment or been treated for the use of any drug or chemical substance, including alcohol?" In response to this question, Defendant answered "NO". Defendant has admitted that he spent approximately six (6) months in treatment at Talbott in 2002.

11. In or around late October 2010, the Missouri Health Professionals Recovery Program contacted OUHSC and advised them of Defendant's prior treatment and alcohol abuse. Representatives of the OUHSC then confronted Defendant about his past history with alcohol abuse and treatment. Defendant admitted that he had not been truthful with OUHSC when seeking employment and had not reported his past abuse and treatment. He also admitted that he had relapsed on alcohol.

12. On or about November 8, 2010, Defendant entered Talbott for treatment for alcohol abuse for a second time. Defendant was discharged from treatment on or about March 30, 2011.

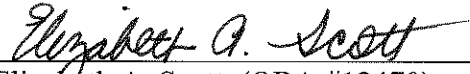
13. Prior to discharge from Talbott, Defendant met with Board investigators and admitted that he had lied on his application for reinstatement by not disclosing his prior treatment and most recent relapse on alcohol.

14. 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).
  - E. Engaged in the use of any false, fraudulent, or deceptive statement in any document connected with the practice of medicine and surgery in violation of OAC 435:10-7-4(19).
  - F. Engaged in fraud or misrepresentation in applying for or procuring a medical license or in connection with applying for or procuring periodic reregistration of a medical license in violation of OAC 435:10-7-4(8).

*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,



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