

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

FILED

FEB - 3 2006

STATE OF OKLAHOMA )  
EX REL. THE OKLAHOMA BOARD )  
OF MEDICAL LICENSURE )  
AND SUPERVISION, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
TODD ANTHONY KREHBIEL, M.D., )  
LICENSE NO. 18489, )  
 )  
Defendant. )

OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE & SUPERVISION

Case No. 05-12-3031

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, Todd Anthony Krehbiel, 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, Todd Anthony Krehbiel, M.D., holds Oklahoma license no. 18489.

3. On or about November 16, 2005, Defendant stopped his car at the scene of an automobile accident. When questioned by a police officer, he admitted he had been drinking a lot of wine and should not have been operating a motor vehicle. The police officer attempted to conduct the field sobriety test on him, but he could not follow the directions. The police officer arrested him for Actual Physical Control of a Motor Vehicle While Under the Influence of Alcohol. The police officer requested that Defendant submit to the State's Breath Test, but Defendant refused.

4. On or about December 15, 2005, Defendant plead guilty to criminal misdemeanor DUI in the District Court of Oklahoma, State of Oklahoma, Case No. CM-2005-4388. Defendant received a one (1) year suspended sentence and was ordered to complete ninety (90) days of inpatient treatment at Talbott Recovery Center in Atlanta, Georgia, as well as to pay court costs and fines, participate in the Victim's Impact Panel, and obtain an assessment, which he had already done.

5. Defendant is guilty of unprofessional conduct in that he:
- A. Is habitually intemperate or habitually uses habit-forming drugs in violation 59 O.S. §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. Confessed to a crime involving violation of the laws of this state in violation 59 O.S. §509(7).

***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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Elizabeth A. Scott (OBA #12470)  
Assistant Attorney General  
State of Oklahoma  
5104 N. Francis, Suite C  
Oklahoma City, OK 73118  
Attorney for the Plaintiff