

**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.** )  
 )  
**BRYAN SCOTT WOOD, M.D.,** )  
**M.D. LICENSE NO. 18662,** )  
 )  
**Defendant.** )

**Case No. 98-05-1996**

**COMPLAINT**

Plaintiff, the State of Oklahoma ex rel. the Oklahoma State Board of Medical Licensure and Supervision (the "Board"), through Jan Stratton, Investigator ("Complainant"), for its Complaint against the Defendant, Bryan Scott Wood, 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, Bryan Scott Wood, M.D., holds Oklahoma license no. 18662 in the State of Oklahoma.
3. Through the unlawful methods described below, Defendant obtained for his wife, or assisted his wife in obtaining, prescriptions for hydrocodone, a Schedule III controlled substance (C-III) and oxycontin, a controlled substance (C-II). Defendant's actions were taken with knowledge of his wife's hydrocodone addiction and occurred in part while Defendant's wife was pregnant.
4. Defendant has written prescriptions for hydrocodone (C-III) in the name of his wife's sister to be filled and used by his wife.
5. Defendant has forged the signature and DEA number of Michael Terry, M.D., holding Oklahoma medical license no.11835, in order to provide hydrocodone and oxycontin prescriptions to his wife. Upon information and belief, Dr. Terry was not practicing in the State of Oklahoma at the time these prescriptions were forged.

6. During 1997 Defendant asked five (5) other physicians to write him prescriptions for hydrocodone (C-III) so that he could obtain the drug for his wife's use. Records from several local pharmacies show the following prescriptions written in Defendant's name by these five physicians:

<b>Date</b>	<b>Drug</b>	<b>Amount</b>	<b>RX No.</b>	<b>Prescribing M.D.</b>
3/17/97	Lorcet 10mg	15	111474	OK Lic. No. 3137
	Lorcet 10mg	40	33161	OK Lic. No. 18610
4/6/97	Hydrocodone- APAP 10mg	20	3264309	OK Lic. No. 18469
4/17/97	Lorcet 10mg	30	111664	OK Lic. No. 18469
5/1/97	Lortab 7.5 mg	30	111768	OK Lic. No. 18610
5/3/97	Lorcet 10mg	20	3107786	OK Lic. No. 18469
5/23/97	Hydrocodone- APAP 10mg	30	43218	OK Lic. No. 18469
5/30/97	Lorcet 10mg	15	111928	OK Lic. No. 18610
6/7/97	Lorcet 10mg	30	4446362	OK Lic. No. 18469
6/9/97	Lorcet 10mg	15	111962	OK Lic. No. 15810
6/20/97	Hydrocodone- APAP 10mg	30	3293416	OK Lic. No. 18469
7/5/97	Lorcet 10mg	30	3116645	OK Lic. No. 18469
7/10/97	Lorcet 10 mg	30	3299698	Brian Cook, resident
7/11/97	Lortab 10mg	30	3729236	OK Lic. No. 18610
7/14/97	Hydrocodone- APAP 10mg	30	50196	OK Lic. No. 18469
7/21/97	Lortab 10mg	30	4447085	OK Lic. No. 18610
7/23/97	Lorcet 10mg	30	112244	OK Lic. No. 15810
8/2/97	Hydrocodone- APAP 10mg	30	52562	OK Lic. No. 18469
9/19/97	Lorcet 10mg	30	3127046	OK Lic. No. 18469
10/6/97	Hydrocodone- APAP 10mg	30	3329752	OK Lic. No. 15810
10/7/97	Cyclobenzaprine 10mg	30	6329753	OK Lic. No. 15810
11/7/97	Ambien 10mg	30	4134012	OK Lic. No. 15810
11/30/97	Norco 10mg	30	3351799	OK Lic. No. 18469
12/1/97	Lorazepam 2mg	60	4754908	OK Lic. No. 15810
12/10/97	Norco 10mg	60	118430	OK Lic. No. 15810

7. Defendant also supplied hydrocodone (C-III) to his wife by asking physicians under his supervision to prescribe it for her without first establishing a valid physician patient relationship.

8. In the fall of 1997, Defendant unsuccessfully attempted to detoxify his wife at home using oxycontin controlled release tablets, a Schedule II controlled dangerous substance (C-II). Defendant involved William Dean Spence, M.D., Oklahoma license number 12269, and D.W. Madoux, M.D., Oklahoma license number 15810, in this unlawful detoxification treatment program in violation of OAC 475:30-1-5.

9. Defendant should be evaluated for possible personal impairment or drug addiction and for co-dependence given the nature of his unprofessional conduct involving controlled substances.

10. Based on the above allegations, Defendant is guilty of unprofessional conduct as follows:

- A. Confession of a crime involving a violation of the anti-narcotic laws and regulations of the federal government, and the laws of this state (63 Okla. Stat. §2-406 and §2-408) in violation of 59 Okla. Stat. §509(8).
- B. Commission of any act which is a violation of the criminal laws of this state (63 Okla. Stat. §2-406 and §2-408) when such act is connected with Defendant's practice in violation of 59 Okla. Stat. §509(10).
- C. Use of any false, fraudulent or deceptive statement in any document connected with the practice of medicine and surgery in violation of 59 Okla. Stat. §509(12) and OAC 435:435:10-7-4(19).
- D. Violation, or attempted violation, directly or indirectly, of the provisions of the Oklahoma Allopathic Medical and Surgical Licensure and Supervision Act, either as a principal, accessory or accomplice in violation of 59 Okla. Stat. §509(14).
- E. Prescribing, selling, administering, distributing, ordering, or giving drugs legally classified as controlled substances or recognized as addictive dangerous drugs to family members in violation of OAC 435:10-7-4(26).
- F. Prescribing, selling, administering, distributing, ordering, or giving any drug legally classified as a controlled substance or recognized as an addictive or dangerous drug for other than medically accepted

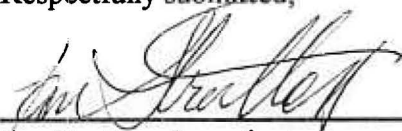
therapeutic purposes in violation of OAC 435:10-7-4(24).

- G. Prescribing, selling, administering, distributing, ordering, or giving to a habitue or addict or any person previously drug dependent, any drug legally classified as a controlled substance or recognized as an addictive or dangerous drug in violation of OAC 435:10-7-4(25).
- H. Violating any state or federal law or regulation relating to controlled substances in violation of OAC 435:10-7-4(27).

**Conclusion**

WHEREFORE, Complainant prays 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, including an order requiring Defendant to be evaluated for possible personal impairment or addiction and possible co-dependence, and an assessment of costs and attorney's fees incurred in this action as provided by law.

Respectfully submitted,

  
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 Jan Stratton, Investigator  
 Oklahoma State Board of Medical  
 Licensure and Supervision

3:45 PM 6-12-98

STATE OF OKLAHOMA            )  
   ) ss:  
 COUNTY OF OKLAHOMA        )

Subscribed and sworn to before me this 12<sup>th</sup> day of June, 1998.

  
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 Notary Public

My Commission expires:

11-30-98