

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

FILED

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

Plaintiff,

v.

TODD SCOTT REDDING, M.D.,
LICENSE NO. 19387,

Defendant.

JUL 13 2005

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 05-07-2970

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 Scott Redding, 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 Scott Redding, M.D., holds Oklahoma license no. 19387.
3. On or about April 9, 2003, Defendant was arrested by the Tulsa Police Department for possession of marijuana and paraphernalia. On or about April 11, 2003, criminal misdemeanor charges were filed against the Defendant based upon the April 9, 2003 arrest.
4. Defendant subsequently admitted to a Board investigator that he had been in possession of marijuana and paraphernalia, and that he had recently used crack cocaine.
5. On or about July 17, 2003, the Board entered an Order Accepting Voluntary Submittal to Jurisdiction whereby Defendant's license was **SUSPENDED** for a period of ninety (90) days beginning April 17, 2003, to be followed by a five (5) year term of **PROBATION**.
6. The Order Accepting Voluntary Submittal to Jurisdiction sets forth Defendant's terms of probation and provides that Defendant shall be on probation as follows:

(E) Defendant will not prescribe, administer, dispense or possess any drugs in Schedules I through V.

(J) Defendant will have the affirmative duty not to ingest any other substance which will cause a body fluid sample to test positive for prohibited substances.

7. The provisions cited above have not been modified or deleted but remain in full force and effect as terms and conditions of Defendant's probation.

8. In or around December 2004 and January 2005, Defendant relapsed on cocaine and alcohol on several occasions.

9. Defendant entered treatment at Rush Behavioral Health Center from February 10, 2005 through April 15, 2005, then continued his treatment at the Rush Advanced Independent Living Program.

10. During his treatment at Rush, Defendant relapsed on two (2) occasions, the most recent occurring while in the Advanced Independent Living Program.

1 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. Purchased or prescribed a regulated substance in Schedules I through V for the physician's personal use in violation of OAC 435:10-7-4(5).

F. Prescribed, sold, administered, distributed, ordered or gave a drug legally classified as a controlled substance or recognized as

an addictive dangerous drug to a family member or to himself or herself in violation of OAC 435:10-7-4(26).

G. Prescribed, sold, administered, distributed, ordered or gave 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).


H. Prescribed, dispensed or administered controlled substances or narcotic drugs in excess of the amount considered good medical practice or prescribed, dispensed or administered controlled substances or narcotic drugs without medical need in accordance with published standard in violation of OAC 435:10-7-4(2) and (6).

I. Violated a state or federal law or regulation relating to controlled substances in violation of OAC 435:10-7-4(27).

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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