

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.)

RALPH AUBREY FORD, M.D.,)
OKLAHOMA MEDICAL LICENSE NO. 19522,)

Defendant.)

APR 15 2004

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 04-03-2785

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, Ralph Aubrey Ford, M.D., Oklahoma medical license no. 19522, 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, Ralph Aubrey Ford, M.D., holds Oklahoma medical license no. 19522.

3. On or about January 28, 2004, the Board of Registration for the Healing Arts for the State of Missouri and the Defendant entered into a Settlement Agreement whereby Defendant was **PUBLICLY REPRIMANDED** and additionally required to complete twenty-five (25) hours of continuing medical education on the topic of chest pain within twelve (12) months of the date of the Settlement Agreement. The discipline imposed by Missouri was based upon an incident which occurred on April 17, 2002 where Defendant acted with incompetency and gross negligence while treating a patient at the Salem Memorial District Hospital in Salem, Missouri. The patient died as a result of Defendant's incompetency and gross negligence.

4. Defendant is guilty of unprofessional conduct in that he:

A. Was subject to disciplinary action of another state or jurisdiction based upon acts or conduct by the licensee

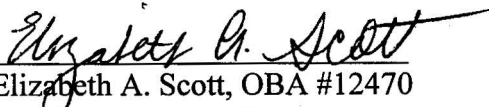
similar to acts or conduct that would constitute grounds for action as defined in this section pursuant to OAC 435:10-7-4(31).

Conclusion

WHEREFORE, plaintiff 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 the revocation or suspension of the Defendant's license to practice as a physician and surgeon in the State of Oklahoma, the assessment of costs and fees incurred in this action, and any other appropriate action with respect to Defendant's license to practice as a physician and surgeon in the State of Oklahoma.

Dated this 15th day of April, 2004 at 1:00 p.m.

Respectfully submitted,


Elizabeth A. Scott, OBA #12470
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Attorney for the State of Oklahoma ex rel.
Oklahoma State Board of Medical
Licensure and Supervision