

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

FILED

FEB 14 2024

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

STATE OF OKLAHOMA, *ex rel.*)
OKLAHOMA STATE BOARD)
OF MEDICAL LICENSURE)
AND SUPERVISION,)
)
Plaintiff,)
)
v.)
)
OKEY NWOKOLO, M.D.,)
LICENSE NO. MD 19613,)
)
Defendant.)

Case No. 23-10-6273

VERIFIED COMPLAINT

The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision (“Board”), for its Verified Complaint against Okey Nwokolo, M.D. (“Defendant”), alleges and states as follows:

I. JURISDICTION

1. The Board has jurisdiction over the subject matter and 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. 59 O.S. § 480, *et seq.* and Okla. Admin. Code 435:5-1-1, *et seq.*
2. Defendant holds medical license No. 19613, issued on 11/17/1995 by the Board. The acts and/or omissions complained of herein were made while Defendant was licensed to practice medicine by the State of Oklahoma.

II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

3. This action arises out of unprofessional conduct by Defendant as detailed herein. The Board originally received notice of allegations of unprofessional conduct relating to Defendant’s practice from the U.S. Drug Enforcement Agency (“DEA”). A Board Investigator subsequently accompanied DEA agents to an inspection of Defendant’s facility, where it was determined that Defendant’s supervisee, Ngozi Nwokolo, advanced practice register nurse (“APRN”), had written at least five (5) prescriptions for controlled dangerous substances (“CDS”) with an expired Oklahoma Bureau of Narcotics and Dangerous Drugs (“OBN”) registration number. It was determined that Ngozi Nwokolo, whose APRN practice Defendant supervises, allowed her OBN registration, no. 61826, to become inactive for the period of December 2, 2021, through September 20, 2023, nearly

two (2) years. Defendant, as the allopathic physician supervising Ngozi Nwokolo, APRN, had and has duty to provide adequate supervision of his supervisee and accordingly knew or should have known that supervisee Ngozi Nwokolo, APRN's OBN registration number was expired and that she was legally precluded from writing prescriptions for CDS during this time.

III. VIOLATIONS

4. Based on the foregoing, Defendant is guilty of unprofessional conduct as follows:
 - a. Aiding or abetting, directly or indirectly, the practice of medicine by any person not duly authorized under the laws of this state, in violation of 59 O.S. 509(14).

V. CONCLUSION

Given the foregoing, the undersigned respectfully requests 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 professional license, including an assessment of costs and attorney's fees incurred in this action as provided by law.

Respectfully submitted,



Alex A. Pedraza, OBA No. 33584
Assistant Attorney General
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION
101 N.E. 51st Street
Oklahoma City, Oklahoma 73105
Telephone: 405.522.5264
Email: Alex.Pedraza@oag.ok.gov

Faint, illegible text at the top of the page, possibly a header or introductory paragraph.

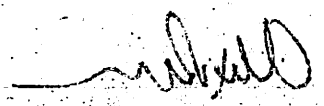
Section header or title, centered on the page.

Second paragraph of faint, illegible text.

Section header or title, centered on the page.

Third paragraph of faint, illegible text.

Text centered below the third paragraph.



Printed text block below the signature, containing several lines of illegible characters.

VERIFICATION

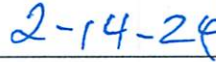
I Robbin Roberts, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

1. I have read the above Complaint regarding Okey Nwokolo, M.D.; and
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.



Robbin Roberts, Investigator
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Date:





County, State of Execution