

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

FILED

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OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

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

Plaintiff)

v.)

Case No. 06-01-3037)

JULIE DEANNA WILLIAMS, M.D.,)
LICENSE NO. 20262,)

Defendant.)

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, Julie Deanna Williams, M.D., Oklahoma license no. 20262, 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, Julie Deanna Williams, M.D., holds Oklahoma license no. 20262, and is a psychiatrist practicing in Oklahoma City, Oklahoma.

3. A review of Defendant's records reveals that Defendant began treating her brother, Patient PWK, on or around August 18, 2004 and continuing through at least December 12, 2005. Prescriptions written by Defendant to Patient PWK during this time include thirteen (13) prescriptions for Adderall, a Schedule II controlled dangerous drug, for 690 dosage units, and three (3) prescriptions for Clonazepam, a Schedule IV controlled dangerous drug, for 130 dosage units. A review of Defendant's records reveals that she failed to perform any physical examination on this patient prior to prescribing the controlled dangerous drugs, and that she failed to maintain complete and accurate records of all controlled dangerous drugs prescribed to her brother, Patient PWK.

4. On December 27, 2005, Board investigators contacted numerous pharmacies in the Oklahoma City area to determine what prescriptions had been written by Defendant to Patient PWK. Board investigators contacted Sav-On Pharmacy #2267 and requested a prescription profile for all controlled dangerous substances prescriptions from Defendant to her brother, Patient PWK. Brian Hooper, pharmacist for Sav-On pharmacy, advised Board investigators that approximately one (1) week earlier, a representative from Defendant's office had contacted him and asked that a prescription profile for all controlled dangerous substances from Defendant to Patient PWK be faxed to Defendant's office. Patient PWK also contacted the pharmacy on that same date and inquired as to when the prescriptions from Defendant to him began.

5. Board investigators subsequently subpoenaed and received a copy of the chart Defendant had prepared for Patient PWK. Defendant admits that Patient PWK's chart was kept in a place separate from other charts at her practice and that she treated him either at her office or at his house. Patient PWK's chart contains numerous inaccuracies, including two (2) instances where prescriptions were noted to have been given, but the prescriptions were filled days before the alleged office visits. The chart is missing alleged office visits, contains undated or misdated office visits, and references an office visit which could not have occurred yet since it was in the future. Additionally, nine (9) of the sixteen (16) prescriptions for controlled dangerous drugs are not noted in the chart in any way.

6. Defendant additionally wrote, administered or authorized prescriptions for non-controlled dangerous drugs to Patient PWK, including Lexapro, Respa-PE and Fluticasone. Defendant failed to perform any physical examination on Patient PWK prior to prescribing these dangerous drugs to him, she did not establish a legitimate medical need for the medications, and she did not establish a valid physician patient relationship prior to prescribing the medications. Defendant's chart contains no reference to any of these prescriptions to Patient PWK.

7. Defendant is guilty of unprofessional conduct in that she:
- A. 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).
 - B. Prescribed or administered a drug or treatment without sufficient examination and the establishment of a valid physician patient relationship in violation of 59 O.S. § 509 (12).
 - C. Failed to maintain an office record for each patient which accurately reflects the evaluation, treatment, and medical necessity of treatment of the patient in violation of 59 O.S. § 509 (18).
 - D. Prescribed, sold, administered, distributed, ordered, or gave any 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).

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

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 6th day of April, 2006 at 11:00 a.m.

Respectfully submitted,



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