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

STATE OF OKLAHOMA, ex rel.,	, FILED
OKLAHOMA STATE BOARD OF	JUN 0 9 2020
MEDICAL LICENSURE	)
AND SUPERVISION,	OKLAHOMA STATE BOARD OF MEDICAL LICENSURE & SUPERVISION
Plaintiff,	
v.	) Case No. 18-10-5664
BRYAN FRANK PERRY, M.D.,	)
LICENSE NO. MD 20773	
Defendant.	)

## VERIFIED COMPLAINT

The State of Oklahoma, *ex rel*. Oklahoma State Board of Medical Licensure and Supervision ("Board"), alleges and states as follows for its Complaint against **BRYAN FRANK PERRY**, **M.D**. ("Defendant"):

#### I. JURISDICTION

- The Board has jurisdiction over the subject matter and is the 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.
- Defendant holds Oklahoma medical license no. 20773.
- The acts and omissions complained of herein were made while Defendant was a licensed physician in the State of Oklahoma. Such acts and omissions occurred within the physical territory of the State of Oklahoma.

#### II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

 On March 2, 2020, a jury found the defendant guilty of Manslaughter, a felony, in Oklahoma County case number CF-2018-5257 and recommended fifteen (15) years incarceration. 5. Sentencing was originally scheduled for April 14, 2020; but, continued to May 21, 2020.

#### III. VIOLATIONS

- Based on the foregoing, the Defendant is guilty of unprofessional conduct as follows: 12.
  - Conviction of a felony, OAC 435:5-1., OAC 435:10-7-4(10), Title 59 O.S. §509(7) and Title 59 O.S. §513(2).

#### IV. CONCLUSION

Given the foregoing, the undersigned respectfully request the Board to conduct a hearing, and upon proof of the allegation contained herein, impose such disciplinary action as authorized by law and any other appropriate action with respect to the Defendant's professional license, including an assessment of costs and attorney's fees incurred in this action as provided by law.

Respectfully submitted,

Marc S. Pate, OBA No. 10567 **Assistant Attorney General** 313 NE 21st Street Oklahoma City, Oklahoma 73105 (405)521-3921

### VERIFICATION

- I, Robbin Roberts, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:
  - I have read the above Complaint regarding BRYAN FRANK PERRY, M.D.; 1.
  - The factual statements contained therein are true and correct to the best of my 2. knowledge and belief.

Robbin Roberts, Investigator

OKLAHOMA STATE BOARD OF MEDICAL

LICENSURE AND SUPERVISION

Date: 4-30-20 Oklahoma County, Oklahoma