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

STATE OF OKLAHOMA EX REL. THE OKLAHOMA BOARD	FILED
OF MEDICAL LICENSURE AND SUPERVISION,	SEP 5 2000
Plaintiff,	OKLAHOMA STATE BOARD OF MEDICAL LICENSURE & SUPERVISION
v.) Case No. 00-07-2236
PAUL CLARK REDMAN, M.D., LICENSE NO. 20796,))
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, Paul Clark Redman, 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.
 - Defendant, Paul Clark Redman, M.D., holds Oklahoma license no. 20796
- 3. From January 9, 1999 until July 17, 2000, Defendant wrote approximately thirty-four (34) prescriptions for controlled dangerous drugs to his wife in her maiden name. All of the prescriptions were for Schedule III controlled dangerous drugs. These prescriptions were filled at three (3) different Tulsa, Oklahoma pharmacies during this time period. A review of Defendant's records reveals that he failed to make and keep any records of the controlled drugs he was prescribing to his wife.
- 4. Upon information and belief, some if not all of the controlled dangerous drugs that Defendant prescribed to his wife were for his personal use.
- 5. On or about August 8, 2000, Defendant was admitted to Talbott Recovery Center for evaluation and treatment for substance abuse.
 - 6. Defendant is guilty of unprofessional conduct in that he

- A. Engaged in dishonorable or immoral conduct which is likely to deceive, defraud or harm the public in violation of 59 O.S. §509(9) and OAC 435:10-7-4(11).
- B. 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(14) and OAC 435:10-7-4(39).
- C. Prescribed, sold, administered, distributed, ordered or gave a drug legally classifed 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).
- D. Prescribed a drug without sufficient examination and establishment of a valid physician patient relationship in violation of 59 O.S. §509(13).
- E. Wrote a false or fictitious prescription for any drugs or narcotics declared by the laws of this state to be controlled or narcotic drugs in violation of 59 O.S. §509(12).
- F. Committed an act which is a violation of the criminal laws of any state when such act is connected with the physician's practice of medicine in violation of 59 O.S. §509(10).
- G. Indiscriminate or excessive prescribing of controlled or narcotic drugs in violation of OAC 435:10-7-4(1).
- H. Used a false, fraudulent or deceptive statement in a document connected with the practice of medicine and surgery in violation of OAC 435:10-7-4(19).
- I. 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(19).
- J. Habitually uses habit-forming drugs in violation 59 O.S. §509(5) and OAC 435:10-7-4(3).
- K. 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(16) and OAC 435:10-7-4(40).

- L. Violated a state or federal law or regulation relating to controlled substances in violation of OAC 435:10-7-4(27), 63 O.S. §2-404, OAC 475:25-1-3 and OAC 475:30-1-3.
- M. Purchased or prescribed any regulated substance in Schedule I through V, as defined by the Uniform Controlled Dangerous Substances Act, for the physician's personal use in violation of OAC 435:10-7-4(5).

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,

Elizabeth A. Scott (OBA #12470)

Assistant Attorney General

State of Oklahoma

5104 N. Francis, Suite C Oklahoma City, OK 73118

Attorney for the Plaintiff