



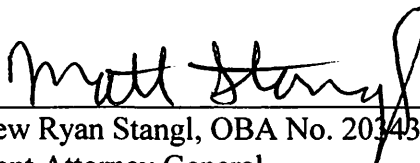
4. On September 16, 2013, Complainant faxed Board Investigator SW a copy of the New York prescribing record which showed prescriptions written to Defendant, as well as Patient JC, by Complainant. Complainant stated that he had never seen Patient JC or Defendant as patients and did not have medical records for either.
5. Complainant informed Board Investigator SW that Defendant worked for him during the months of January, February and March of 2013. Defendant was hired through an employment agency while a staff member of Complainant was out on maternity leave.
6. Upon analyzing the New York prescribing record, it was found that Defendant wrote and authorized four (4) CDS prescription, and also forged two (2) CDS prescriptions, to Patient JC using the prescription pad she had stolen from Complainant. The New York prescribing record also showed that on July 13, 2013, Defendant fraudulently prescribed three (3) CDS to herself by forging Complainant's signature.
7. On October 11, 2013, Board Investigator SW met with Defendant and her attorney. During this meeting **Defendant admitted to forging the three CDS prescriptions (Percocet, Xanax, and Ambien) for herself on July 20, 2013.**
8. **Defendant also admitted to forging two (2) CDS prescriptions (Oxycodone and Alprazolam), and to writing four (4) CDS prescriptions (Oxycodone, Amphetamine x2, and Alprazolam) in Defendant's own name for Patient JC and, further, not creating a medical record.**
9. Defendant is guilty of unprofessional conduct in that she engaged in:
  - a) Dishonorable or immoral conduct which is likely to deceive, defraud, or harm the public in violation of 59 Okla. Stat. § 509(8) and OAC 435:10-7-4(11);
  - b) The commission of any act which is a violation of the criminal laws of any state when such act is connected with the physician's practice of medicine. A complaint, indictment or confession of a criminal violation shall not be necessary for the enforcement of this provision. Proof of the commission of the act while in the practice of medicine or under the guise of the practice of medicine shall be unprofessional conduct in violation of 59 Okla. Stat. § 509(9);
  - c) The writing of false or fictitious prescriptions for any drugs or narcotics declared by the laws of this state to be controlled or narcotic drugs in violation of 59 Okla. Stat. § 509(11);

- d) Prescribing or administering a drug or treatment without sufficient examination and the establishment of a valid physician-patient relationship in violation of 59 Okla. Stat. § 509(12);
- e) Failure 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 Okla. Stat. § 509(18);
- f) Purchasing or prescribing 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);
- g) Prescribing, selling, administering, distributing, ordering, or giving 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); and
- h) Violating any state or federal law or regulation relating to controlled substances in violation of OAC 435:10-7-4(27).

**CONCLUSION**

WHEREFORE, Plaintiff, the State of Oklahoma, 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 physician assistant license, and an assessment of costs and attorney's fees incurred in this action as provided by law.

Respectfully submitted,



Matthew Ryan Stangl, OBA No. 20343  
Assistant Attorney General  
State of Oklahoma  
313 N.E. 21<sup>st</sup> Street  
Oklahoma City, OK 73105

*Attorney for State of Oklahoma ex rel.  
The Oklahoma State Board of Medical  
Licensure and Supervision*