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

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EX REL. THE OKLAHOMA)	
OF MEDICAL LICENSURE AND SUPERVISION,	N	MA STATE BOARD OF CENSURE & SUPERVISION
Plaintiff)	
v.) Case No. 02-0	9-2550
)	
MILES JAMES JONES, M.D.,)	
OKLAHOMA MEDICAL LICENSE NO. 2184	1,)	
)	
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, Miles James Jones, M.D., Oklahoma medical license no. 21847, 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, Miles James Jones, M.D., holds Oklahoma medical license no. 21847.

3. On or about July 26, 2002, the North Dakota State Board of Medical Examiners entered an order revoking Defendant's license based upon a finding that Defendant was guilty of dishonorable, unethical or unprofessional conduct likely to deceive, defraud, or harm the public, and that he engaged in a pattern of inappropriate care as a physician. Specifically, Defendant repeatedly wrote prescriptions for patients over the Internet without first examining the patient or obtaining appropriate information from the patient.

- 4. Defendant is guilty of unprofessional conduct in that he:
 - A. Was subject to disciplinary action of another state or jurisdiction based upon acts or conduct by the licensee similar to acts or conduct that would constitute grounds for

action as defined in this section pursuant to OAC 435:10-7-4(31).

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 (ay) day of December, 2002 at $\frac{9}{2}$ $\frac{30}{2}$ g.m.

Respectfully submitted,

alth 1.

Elizabeth A. Scott, OBA #12470 Assistant Attorney General State of Oklahoma 5104 N. Francis, Suite C Oklahoma City, OK 73118

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