

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

STATE OF OKLAHOMA, *ex rel.*)
OKLAHOMA STATE BOARD)
OF MEDICAL LICENSURE)
AND SUPERVISION,)
)
Plaintiff,)
)
v.)
)
JASON TYLER STANSILL, M.D.,)
LICENSE NO. MD 22433,)
)
Defendant.)

FILED
JUL 07 2017
OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 16-08-5349

VERIFIED COMPLAINT FOR PROFESSIONAL MISCONDUCT

The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision (“Board”) alleges and states as follows for its Complaint against Jason Tyler Stansill, M.D. (“Defendant”):

I. JURISDICTION

1. This Board has jurisdiction over the subject matter and 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. 59 O.S. 2011, § 480, *et seq.* and Okla. Admin. Code 435:5-1-1 *et seq.*
2. Defendant holds Oklahoma medical license no. 22433, which was first issued on September 3, 2002. His license was inactive from September 2, 2004, through May 17, 2007, and has been active since his renewal in May 2007.

II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

3. This action arises out of an affirmative response on Defendant’s 2016 license renewal. Defendant stated that he was arrested on April 30, 2016, for sexual assault for an incident that occurred at a Renaissance Fair in Muskogee. Defendant admitted to striking a woman on the buttocks. Defendant was arrested shortly thereafter.
4. Defendant was charged with one count of sexual battery, a felony, in Muskogee County case number CF-2016-482. Further review shows that the charge was reduced to the misdemeanor, Act Resulting in Gross Injury, to which he plead guilty, was given a two year deferred sentence and a \$500 fine.

5. Subsequently, another complaint was made by a former patient of Defendant. The patient, R.L.W., stated that Defendant sent her sexually explicit texts on or about August 14, 2016.
6. Defendant was interviewed by Board Investigator Stephen Washbourne on August 18, 2016. Defendant admitted to striking a woman at the renaissance fair, but did not remember sending sexually inappropriate texts to patient R.L.W. Defendant stated he would not deny the allegation if that is what the texts showed. Defendant further stated that he is an alcoholic and had been attending Alcoholics Anonymous for three days.
7. Defendant completed an assessment at Professional Renewal Center in Lawrence, Kansas, from August 24, 2016 through August 27, 2016. At this evaluation, Defendant admitted to sending sexually inappropriate text messages to four or five other patients.
8. Defendant also received in-patient treatment at Pine Grove Behavioral Health and Addiction Services, from September 12, 2016 through December 10, 2016, and from February 6, 2017 through March 6, 2017.

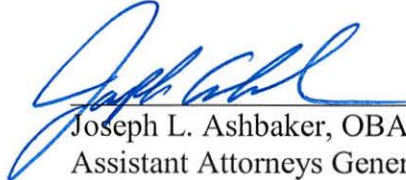
III. VIOLATIONS

9. Based on the foregoing, Defendant is guilty of unprofessional conduct as follows:
 - a. Habitual intemperance or the habitual use of habit-forming drugs, in violation of 59 O.S. 2011, § 509(4);
 - b. Dishonorable or immoral conduct which is likely to deceive, defraud, or harm the public, in violation of 59 O.S. 2011, § 509(8);
 - c. Engaging in physical conduct with a patient which is sexual in nature, or in any verbal behavior which is seductive or sexually demeaning to a patient, in violation of 59 O.S. 2011, § 509(17);
 - d. The habitual or excessive use of any drug which impairs the ability to practice medicine with reasonable skill and safety to the patient, in violation of Okla. Admin. Code § 435:10-7-4(3);
 - e. Conduct likely to deceive, defraud, or harm the public, in violation of Okla. Admin. Code § 435:10-7-4(11);
 - f. Commission of any act of sexual abuse, misconduct, or exploitation related or unrelated to the licensee's practice of medicine and surgery, in violation of Okla. Admin. Code § 435:10-7-4(23); and
 - g. Abuse of physician's position of trust by coercion, manipulation or fraudulent representation in the doctor-patient relationship, in violation of Okla. Admin. Code § 435:10-7-4(44).

IV. CONCLUSION

Given the foregoing, the undersigned 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 professional license, including an assessment of costs and attorney’s fees incurred in this action as provided by law.

Respectfully submitted,




Joseph L. Ashbaker, OBA No. 19395
Assistant Attorneys General
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION
101 N.E. 51st Street
Oklahoma City, Oklahoma 73105
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VERIFICATION

I, Stephen Washbourne, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

- 1. I have read the above Complaint regarding Jason Tyler Stansill, M.D.; and
- 2. The factual statements contained therein are true and correct to the best of my knowledge and belief.



Stephen Washbourne, Investigator
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Date: 7-6-17

Oklahoma County
County, State of Execution