

**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. )  
  
GEORGE SAMER ALHAJ, M.D. )  
LICENSE NO. MD 22845, )  
  
  **Defendant.** )

**FILED**

APR - 3 2023

OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE & SUPERVISION

Case No. 21-11-6075

**VERIFIED COMPLAINT**

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

**I. JURISDICTION**

1. The 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. § 480, *et seq.* and Okla. Admin. Code 435:5-1-1 *et seq.*
2. In Oklahoma, Defendant holds medical license no. 22845.
3. The acts and omissions complained of herein were made while Defendant was licensed to practice medicine by the State of Oklahoma and occurred within the boundaries of the State of Oklahoma.

**II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT**

4. On November 20, 2021, Board staff learned, via a news report, that murder charges had been filed against the Defendant. The allegations involve the death of patient, C.W., who died on January 21, 2019, allegedly due to the Defendant’s prescribing. Defendant has been charged with Murder in the 2<sup>nd</sup> degree, or in the alternative, Manslaughter in the 2<sup>nd</sup> degree, in Kay County case number CF-2021-655.
5. The medical record for C.W., as well as for two other deceased patients, R.W. and G.M., were subpoenaed and obtained. Also obtained were the Medical Examiner reports for each patient.

6. Expert review was had and the expert found numerous issues which were problematic, dangerous and/or fell outside the standard of care.
7. Among the concerns noted by the expert were the following: Defendant did not take a multidisciplinary approach to pain management in spite of mentioning the need to do repeatedly. Defendant had an extraordinary emphasis on doing procedures as soon as possible then using opioids in whatever doses he saw fit and continue those opioids even when it became clear they were not working. Very few restorative measures were taken. Defendant continued to give what seemed like as many injections as possible, as often as possible whether there were signs of improvement or not. Further, it is clear that Defendant would routinely copy records from visit to visit without actually recording meaningful entries.
8. While Defendant repeatedly noted the need to determine the cause of the patient's pain, there is little to no indication that such investigations ever took place. This is especially concerning where patients were not responding favorably to the high doses of opiates being prescribed. In fact, Defendant often ignored warning signs and red flags of addiction.
9. The Medical Examiner report for C.W. determined the cause of death was mixed drug toxicity due to oxymorphone, morphine and zolpidem. The Medical Examiner report for G.M. determined the cause of death was acute Fentanyl intoxication. The Medical Examiner report for R.W. determined the cause of death was multiple drug toxicity.

### III. VIOLATIONS

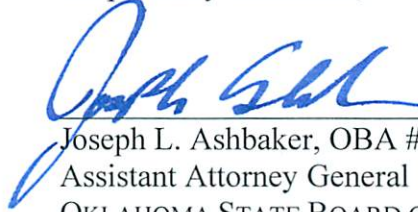
10. Based on the foregoing, Defendant is guilty of unprofessional conduct as follows:
  - a. Dishonorable or immoral conduct which is likely to deceive, defraud, or harm the public, in violation of 59 O.S. §509(8) and Okla. Admin. Code § 435:10-7-4(11).
  - b. Prescribing or administering a drug or treatment without sufficient examination and the establishment of a valid physician-patient relationship and not prescribing in a safe, medically accepted manner, in violation of 59 O.S. §509(12) and Okla. Admin. Code § 435:10-7-4(2).
  - c. Prescribing, dispensing or administering of controlled substances or narcotic drugs in excess of the amount considered good medical practice, in violation of 59 O.S. §509(16)(a).
  - d. Indiscriminate or excessive prescribing, dispensing or administering of Controlled or Narcotic drugs, in violation of Okla. Admin. Code § 435:10-7-4(1).
  - e. Conduct likely to deceive, defraud, or harm the public, in violation of Okla. Admin. Code § 435:10-7-4(11).

- f. Gross or repeated negligence in the practice of medicine, in violation of Okla. Admin. Code § 435:10-7-4(15).

#### 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 # 19395  
Assistant Attorney General  
OKLAHOMA STATE BOARD OF MEDICAL  
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#### VERIFICATION

I, Melissa Davis, RN, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

1. I have read the above Complaint regarding **GEORGE SAMER ALHAJ, MD**, and,
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.



Melissa Davis, RN  
OKLAHOMA STATE BOARD OF MEDICAL  
LICENSURE AND SUPERVISION

Executed this 28<sup>th</sup> day of March, 2023, in Oklahoma County, State of Oklahoma.