

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

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STATE OF OKLAHOMA
EX REL. THE OKLAHOMA BOARD
OF MEDICAL LICENSURE
AND SUPERVISION,

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE
AND SUPERVISION

Plaintiff

v.

Case No. 05-11-3016

DAWN MARIE LAFROMBOISE, M.D.,
LICENSE NO. 23500,

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, Dawn Marie Lafromboise, M.D., Oklahoma license no. 23500, 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, Dawn Marie Lafromboise, M.D., holds Oklahoma license no. 23500 and is a third year resident in the Psychiatry Residency Program at the University of Oklahoma College of Medicine in Tulsa, Oklahoma.

3. In or around September 2003, Defendant treated Patient VMT, a psychiatric patient, at St. John's Medical Center in Tulsa, Oklahoma. Defendant subsequently engaged in a sexual relationship for approximately eighteen (18) months with Patient VMT which continued until at least August 31, 2005. During a portion of this time, Defendant and Patient VMT lived together. Defendant admits that she provided Patient VMT with samples of Zoloft and Zyprexa she had taken from the OU Psychiatry Clinic sample cabinet.

4. In or around October, 2003 Defendant treated Patient RTT, a psychiatric patient, at St. John's Medical Center in Tulsa, Oklahoma. Defendant subsequently engaged in a sexual relationship with Patient RTT which lasted several months.

5. On or about September 1, 2005, Defendant met with the Director of the Psychiatry Residency Training Program in Tulsa, Oklahoma and admitted the facts set forth in paragraphs 3 and 4 above.

6. On or about October 31, 2005 and continuing through November 4, 2005, Defendant obtained an assessment at the Professional Renewal Center in Lawrence, Kansas. The assessment team concluded that Defendant should enter a four (4) to six (6) week intensive treatment program that focuses on sexual misconduct in the workplace. As of the date of the filing of the Complaint, Defendant has not initiated the recommended treatment.

7. On or about December 1, 2005, Defendant was terminated from the Psychiatry Residency Program at the University of Oklahoma College of Medicine in Tulsa, Oklahoma.

8 Defendant is guilty of unprofessional conduct in that she:

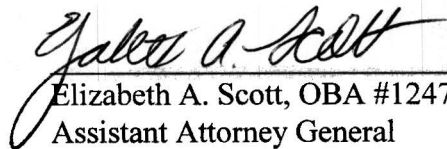
- A Engaged in dishonorable or immoral conduct which is likely to deceive, defraud or harm the public in violation of 59 O.S. § 509 (8) and OAC 435:10-7-4 (11).
- B Engaged in physical conduct with a patient which is sexual in nature, ... in violation of 59 O.S. §509 (17).
- C Committed an act of sexual ... misconduct or exploitation related or unrelated to the licensee's practice of medicine and surgery in violation of OAC 435:10-7-4 (23).
- D Abused the physician's position of trust by coercion [or] manipulation ... in the doctor-patient relationship in violation of OAC 435:10-7-4(44).
- E 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 OAC 435:10-7-4(39).
- F Is unable to practice medicine with reasonable skill and safety to patientsas a result of any mental ...condition in violation of 59 O.S. §509 (15) and OAC 435:10-7-4(40).
- G Is physically or mentally unable to practice medicine and surgery with reasonable skill and safety in violation of OAC 435:10-7-4(17).

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 16th day of December, 2005 at 9:00 a.m.

Respectfully submitted,


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Attorney for the State of Oklahoma ex rel.
Oklahoma State Board of Medical
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