

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

FILED

STATE OF OKLAHOMA)
ex rel. THE OKLAHOMA BOARD)
OF MEDICAL LICENSURE)
AND SUPERVISION,)
)
Plaintiff,)
)
)
v.)
)
JENNIFER R. CAMERON, M.D.)
LICENSE NO. 23608)
)
)
Defendant.)

MAY - 8 2014

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 13-03-4703

COMPLAINT

Plaintiff, State of Oklahoma ex rel. the Oklahoma State Board of Medical Licensure and Supervision (the "Board"), by and through its attorney, Matthew R. Stangl, Assistant Attorney General, for its Complaint against Jennifer R. Cameron, M.D. ("Defendant"), Oklahoma license number 23608, states and alleges 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, Jennifer R. Cameron, M.D., holds Oklahoma license number 23608.

Current Allegations of Unprofessional Conduct

3. Defendant displayed characteristics of a disruptive physician as evidenced by:
 - a) Between February 2013 and September 2013, the Board received four (4) complaints regarding Defendant from former business partners and hospital personnel alleging, among other things, erratic behavior, personality change(s), harassment, rapid speech, angry and/or argumentative outbursts, inappropriate attire, failure to show up for work, and, an inappropriate relationship with one of her patients. During that time, Defendant was also in the midst of divorce proceedings that involved three protective orders between her and her husband,

three civil court cases, and one small claims case involving over twenty issues related to business dealings with former business partners.

- b) On September 27, 2013, Defendant signed an Agreement Not to Practice.
- c) On September 20-23, 2013, Defendant underwent a comprehensive multidisciplinary evaluation at Professional Renewal Center (“PRC”) to determine her fitness for duty. Between October 2013 and February 2014, Defendant entered Santé Center and PCS and participated in all treatment recommendations. On February 18, 2014, Santé reported that Defendant had successfully completed all requirements and deemed her safe to return to practice. They did, however, recommend that Defendant continue in outpatient therapy for a period of time deemed necessary by her provider and the Board.
- d) Defendant had begun treating Patient JG back in January 2013, establishing a patient/physician relationship as evidenced by verified written prescriptions. In June 2013, Defendant entered into a sexual relationship with JG that reportedly lasted through July 2013. Defendant admits that JG was her patient and that a medical chart on patient JG could not be produced upon request.
- e) Board investigators reviewed the text messages between Defendant and Patient JG which do reflect that a sexual relationship took place during the time JG was defendant’s patient, and, Defendant admitted the sexual relationship to staff members at Santé.
- f) Between June 2013 when their sexual relationship began, and July 2013 when that relationship ended, JG was prescribed the following medications by Defendant:

<u>Written Date</u>	<u>Medication</u>	<u>Amount</u>
6-02-13	Promethazine Hydrochloride and codeine Phosphate	240 ml
6-04-13	Hydrocodone Bitartrate and Acetaminiphen 10/325	180
6-25-13	Pentermine 37.5mg	30
7-13-13	Alprazolam 2mg	90
7-13-13	Pentermine 37.5	30

4. 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 Oklahoma Administrative Code Section (“OAC”) 435:10-7-4(11);
- b) 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 Okla. Stat. § 509.17; and

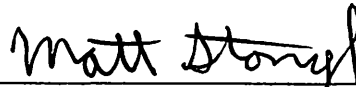
- c) Commission of any act of sexual abuse, misconduct, or exploitation related or unrelated to the licensee's practice of medicine and surgery in violation of OAC 435:10-7-4(23).

Conclusion

Plaintiff, State of Oklahoma ex rel. the Oklahoma State Board of Medical Licensure and Supervision, 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 the revocation or suspension of Defendant's license to practice medicine 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 medicine in the State of Oklahoma.

Dated this 8th of May, 2014.

Respectfully submitted,



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