



### **Agreements and Stipulations**

Plaintiff, Defendant, and the Board Staff stipulate and agree 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 Title 59 O.S. §480 et seq.
2. Defendant, Jennifer R. Cameron, M.D., hold Oklahoma medical license no. 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, the 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 Sante' Center and PCS and participated in all treatment recommendations. On February 18, 2014 Sante' 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 treat Patient JGR 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 JGR that reportedly lasted through July 2013. Defendant admitted that JGR was her patient and that a medical chart on patient JGR could not be produced upon request.
  - e) Board investigators reviewed the text messages between Defendant and Patient JGR which do reflect that a sexual relationship took place during the time JGR 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 Acetaminophen 10/325	180
6-25-13	Phentermine 37.5mg	30
7-13-13	Alprazolam 2mg	90
7-13-13	Phentermine 37.5	30

4. On December 20, 2013, Defendant successfully completed an intensive outpatient program through Psychological Counseling Services, Inc., Ltd., ("PCS"), Scottsdale, Arizona, which was recommended by Santé Center for Healing. Her intensive program included thirty-three (33) individual therapy hours and twenty-two (22) group therapy hours.
5. On February 18, 2014, Defendant completed her recommended boundaries course at Santé Center for Healing.

#### **Conclusions of Law**

6. 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).

**Order**

**IT IS THEREFORE ORDERED** by the Oklahoma State Board of Medical Licensure and Supervision as follows:

1. The Board en banc hereby adopts the agreement of the parties in this Voluntary Submittal to Jurisdiction;
2. It is **ORDERED** that the Defendant will be placed on **PROBATION** for a period of two (2) years. Said **PROBATION** will commence on May 15, 2014 and shall have the following provisions:

**Standard Terms:**


- a) Defendant will conduct her practice in compliance with the Oklahoma Allopathic Medical and Surgical Licensure and Supervision Act as interpreted by the Board. Any question of interpretation regarding the Act or this order shall be submitted in writing to the Board, and no action based on the subject of the question will be taken by Defendant until clarification of interpretation is received by Defendant from the Board or its designee.
- b) Defendant will furnish a copy of this order to each and every state in which she holds licensure or applies for licensure and to all hospitals, clinics or other facilities in which she holds or anticipates holding any form of staff privileges or employment.
- c) Defendant will not supervise allied health professionals that require surveillance of a licensed physician.
- d) Defendant will keep the Board informed of her current address.
- e) Defendant will keep current payment of all assessment by the Board for prosecution, investigation and monitoring of her case unless Defendant affirmatively obtains a deferment of all or part of said fees upon presentation of evidence that is acceptable to the Board Secretary.
- f) Until such time as all indebtedness to the Board has been satisfied, Defendant will reaffirm said indebtedness in any and all bankruptcy proceedings.
- g) Defendant shall make herself available for one or more personal appearances before the Board or its designee upon request.


- h) Defendant shall submit any required reports and forms on a timely and prompt basis to the Compliance Coordinator or designee.
- i) Defendant will execute such releases of medical and psychiatric records during the entire term of probation as necessary for use by the Compliance Coordinator to obtain copies of medical records and authorize the Compliance Coordinator to discuss Defendant's case with Defendant's treating physicians and/or any physicians holding Defendant's records.
- j) Failure to meet any of the terms of this Board Order will constitute cause for the Board to initiate additional proceedings to suspend, revoke or modify license after due notice and hearing.


**Specific Terms:**

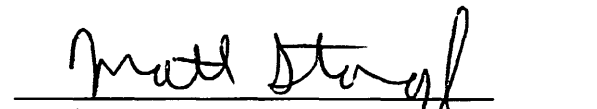
- k) Defendant will sign a contract for a period of two (2) years with Oklahoma Health Professionals Program, Inc., ("OHPP"), under the direction of Dr. Merlin Kilbury.
  - l) Defendant will attend weekly therapy sessions with Dr. Merlin Kilbury of OHPP for a period of two (2) years for the purposes of dealing with Defendant's past boundary issues.
  - m) Defendant will continue twice monthly counseling with her current outside therapist until said therapist and Board Secretary deem it no longer necessary.
  - n) The Defendant, during the term of this probation, will be allowed full prescriptive authority except for no "off label use." Any patients with chronic pain in need of CDS for longer than a 90-day period will require a pain management consultation.
3. Failure to meet any of the terms of this Board Order will constitute cause for the Board to initiate additional proceedings to suspend, revoke or modify license after due notice and hearing.

DATED this 15<sup>th</sup> day of May, 2014.

  
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G. David Casper, M.D., President  
Oklahoma State Board of Medical  
Licensure and Supervision

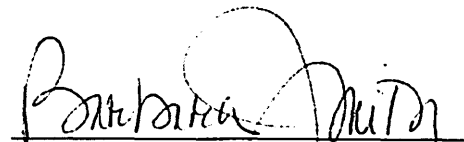
  
Jennifer R. Cameron, M.D.  
License No. 23608

  
Gerald C. Zumwalt, M.D., Secretary  
Oklahoma State Board of Medical  
Licensure and Supervision

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

**Certificate of Service**

This is to certify that on this 15<sup>th</sup> day of May, 2014, a true and correct copy of this Order was sent to Jennifer R. Cameron, M.D., P.O. box 700383, Tulsa, OK 74170-0383.

  
Barbara J. Smith, Legal Assistant