

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

FILED
JUN 17 2016
OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

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

Case No. 13-03-4703

**ORDER OF SUSPENSION OF LICENSE
PENDING EVALUATIONS AND BOARD APPROVAL FOR REINSTATEMENT**

This cause came on for hearing before the Oklahoma State Board of Medical Licensure and Supervision (herein, “Board” or “State”) on May 12, 2016, at the office of the Board, 101 N.E. 51st Street, Oklahoma City, Oklahoma 73105, pursuant to notice given as required by law and the rules of the Board.

Dr. Jennifer R. Cameron, M.D. (herein, “Dr. Cameron” or “Defendant”), holding Oklahoma medical license no. 23608, appeared in person, represented by counsel Daniel J. Gamino of Daniel J. Gamino and Associates, P.C.

Joseph L. Ashbaker, Assistant Attorney General, appeared on behalf of the State.

The Board *en banc* heard testimonies of witnesses, arguments of counsels, reviewed the exhibits presented, and being fully apprised of the premises, finds and orders as follows:

Findings of Fact

1. Defendant currently holds Oklahoma medical license number 23608.
2. 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.

3. 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 for Healing and Psychological Counseling Services, Inc., Ltd. (“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.
 - a. On December 20, 2013, Defendant completed an intensive outpatient program through PCS.
 - b. On February 18, 2014, Defendant completed a boundaries course at Santé Center for Healing.
4. Between June 2013 and July 2013, Defendant entered into a sexual relationship with patient JG, during which time she wrote five (5) controlled dangerous substances prescriptions to JG.
5. On September 27, 2013 Defendant voluntarily signed an Agreement Not to Practice (“2013 ANTP”) with the Board.
6. On May 8, 2014, a Complaint and Citation, Case No. 13-03-4703, were filed against Defendant for allegations of unprofessional conduct including violations of conduct likely to harm the public and sexual misconduct with a patient related to licensee’s practice of medicine.
7. On May 15, 2014, at a regular hearing of the Board, Defendant appeared in person. AAG Matthew Ryan Stangl, appeared on behalf of the State. Defendant offered, and the Board accepted, a Voluntary Submittal to Jurisdiction (“2014 VSJ”), with two (2) years’ PROBATION and Standard and Specific Terms, for violations including sexual misconduct. The 2014 VSJ was made effective and filed of record on May 15, 2014.
8. On December 23, 2015, Defendant voluntarily executed an Agreement Not to Practice (“2015 ANTP”) with the Board due to multiple reports of employment and behavior issues with the Department of Corrections, at the Oklahoma State Penitentiary in McAlester, Oklahoma. Counsel for Defendant, Daniel J. Gamino, executed the 2015 ANTP as witness.
9. On April 27, 2016, the Board filed a Motion to Enforce Board Order for violations of the terms of her 2014 VSJ, which was served upon Defendant’s counsel, Daniel J. Gamino, on April 28, 2016 as is evidenced by a Return of Service filed May 2, 2016.
10. On May 9, 2016, Dr. Cameron’s Answer to Motion to Enforce Board Order was filed.
11. On May 9, 2016, Dr. Cameron filed a Motion to Return to Practice of Medicine (“Motion to Return”), with attached professional evaluations regarding Dr. Jennifer R. Cameron, numbered as pages 1-12. The Motion to Return includes a request for the Board to

maintain the attachments under seal. However, on May 12, 2016, Mr. Gamino admitted the attachments to the Motion to Return into the record.

12. The following are the Defense admitted attachments to the Motion to Return:

- Pg. 1 Letter dated April 18, 2016, to Daniel J. Gamino
From Natacha Byrams, Senior Pastor/Counselor,
Kingdom Keys Ministries, Tulsa, Oklahoma.
- Pg. 2 Letter dated April 21, 2016, to Daniel J. Gamino
From Dr. Philip J. Muller, D.O.,
Associates for Psychiatric Services, P.C., Sioux City, IA.
- Pgs. 3-6 Letter dated May 4, 2016, to Daniel J. Gamino
From Philip Mueller, D.O./alchemy,
Associates for Psychiatric Services, P.C., Sioux City, IA.
- Pgs. 7-12 Neuropsychological Evaluation, dated April 14, 2016,
By: Dr. Clayton J. Toddy, Psy.D., Clinical Psychologist,
Associates for Psychiatric Services, PC.

13. On May 12, 2016, Mr. Gamino called Dr. Cameron as a witness in her own defense.

14. On May 12, 2016, AAG Ashbaker called witnesses in support of the State to testify. In order of appearance: Gary Ricks the Board's Compliance Coordinator, Ms. Robbin Roberts a Board Investigator, and Dr. Merlin Kilbury the Associate Director at the Oklahoma Health Professionals Program ("OHPP").

15. On May 12, 2016, the Board *en banc* concluded that the State has met its burden by clear and convincing evidence, having shown that Dr. Jennifer R. Cameron, M.D. has violated the provisions of the probation and terms set forth in her 2014 VSJ, Case No. 13-03-4703. Specifically:

- a. Dr. Cameron has willfully failed to keep current on her payments as agreed to in paragraph E of her 2014 VSJ and in accordance with the payment schedule she agreed to with Board staff.
- b. Dr. Cameron willfully failed to submit required reports and forms on a timely basis in accordance with paragraph H of the 2014 VSJ and as required by the Board's probation Compliance Coordinator, Gary Ricks.
- c. Dr. Cameron has failed to continue to attend her weekly OHPP meetings as required by paragraph I of the 2014 VSJ and contrary to the recommendations of the OHPP Associate Director, Dr. Merlin Kilbury.
- d. Dr. Cameron has demonstrated erratic and troubling behavior which has led to her termination from her job and in her dealings with both Board Staff and OHPP staff.

16. The Board *en banc* further concluded that in the case of Jennifer R. Cameron, M.D., her Oklahoma medical license should be suspended until she attends a mental health evaluation and receives a fit-for-duty evaluation, and she receives Board Secretary approval for reinstatement of her license under terms of indefinite probation.

Conclusions of Law

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, surgeons and other allied health professionals in the State of Oklahoma pursuant to 59 O.S. § 480 *et seq.* Notice was given as required by law and the rules of the Board.
2. The Board is authorized to suspend, revoke or order any other appropriate sanctions against the license of any physician, surgeon or other allied health professionals holding a license to practice medicine in the State of Oklahoma for unprofessional conduct. 59 O.S. 2011 & Supp. 2014, § 503. 59 O.S. 2011, §§ 509.1(A)(2), (4). This authority is *quasi-judicial* 59 O.S. 2011, § 513(A)(1).
3. The State is authorized to hold this hearing under paragraph J of the 2014 VSJ, shown below, and under 59 O.S. 2011, §509(15), §509.1 and §513(B).
 - 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.
4. The State has met its burden of Clear and Convincing Evidence that Dr. Cameron has willfully violated the terms and conditions of her probation as stated in paragraphs E, H and I of her 2014 VSJ.
5. The State has met its burden by showing that there is probable cause to show that Dr. Cameron cannot currently practice medicine or surgery with reasonable skill and safety as a result of a mental or physical condition.

Orders

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

1. State's Motion to Enforce Board Order is **GRANTED**.
2. The Oklahoma medical license of **JENNIFER R. CAMERON, M.D.** is **SUSPENDED** until such time as she attends, completes and appears before the Board with the results of a mental health evaluation and a fit-for-duty evaluation, approved of in advance by the Board Secretary, and she receives Board Secretary approval for reinstatement of her license under terms of indefinite probation.

3. Failure to meet any of the terms of this Order will be grounds for the Board to initiate proceedings to suspend or revoke the Oklahoma medical license of Jennifer R. Cameron, M.D., after additional notice and hearing as required by law.

4. Promptly upon receipt of an invoice, Defendant shall pay all costs of this action authorized by law, including without limitation, legal fees, investigation costs, staff time, salary and travel expenses, witness fees and attorney's fees. .

5. A copy of this Order shall be provided to Defendant as soon as it is processed.

6. **This Order is subject to review and approval by the Oklahoma Attorney General, and this Order shall become final upon completion of the review by the Oklahoma Attorney General unless disapproved, in which case this Order shall be null and void.**

Dated this 17th day of June, 2016.



Billy H. Stout, M.D., Board Secretary
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Certificate of Mailing

This is to certify that on the 20th day of June, 2016, a true and correct copy of this Order was sent as specified, postage prepaid, to the following:

Certified Mail, Return Receipt Requested

Jennifer R. Cameron, M.D.

3711 Floyd Blvd.

Sioux City, IA 51108

Defendant

By facsimile and U.S. first-class mail:

Daniel J. Gamino

DANIEL J. GAMINO & ASSOCIATES, P.C.

Jamestown Office Park, North Building

3035 N.W. 63rd Street, Suite 214

Oklahoma City, Oklahoma 73116


Telephone: (405) 840-3741

Facsimile: (405) 840-3744

dgamino@coxinet.net

Counsel for Defendant

Jennifer R. Cameron, M.D.



Nancy Thiemann, Legal Secretary



OFFICE OF ATTORNEY GENERAL
STATE OF OKLAHOMA

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**OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION**

**ATTORNEY GENERAL OPINION
2016-392A**

Billy Stout, M.D., Board Secretary
State Board of Medical Licensure and
Supervision
101 NE 51st Street
Oklahoma City, Oklahoma 73105

June 15, 2016

Dear Board Secretary Stout:

This office has received your request for a written Attorney General Opinion regarding agency action that the State Board of Medical Licensure and Supervision intends to take with respect to medical doctor licensee 23608. The proposed action is to suspend the license and require, before reinstatement, submission of positive evaluations of the licensee's mental health and competence to practice. The action also requires that reinstatement include terms of indefinite probation.

The licensee had been disciplined in 2014 due to a sexual relationship with a patient who the licensee had been treating for several months and for whom the licensee had written several prescriptions for controlled dangerous substances. That discipline imposed probation requirements including attendance of counseling sessions, participation in the Board's peer-based mental health program, filing practice reports, and making payments to the Board. Recently, Board staff alleged that the licensee had violated those terms of probation. The Board heard evidence that the licensee failed to make payments, failed to file required reports, and failed to attend meetings as part of the Board's peer-based mental health program. There were also complaints of the licensee engaging in disruptive behavior at work.

The Oklahoma Allopathic Medical and Surgical Licensure and Supervision Act, 59 O.S.2011 & Supp.2015, §§ 480-518.1, authorizes the Board to discipline licensees who engage in unprofessional conduct, 59 O.S.Supp.2015, § 503. Unprofessional conduct includes the "inability to practice medicine with reasonable skill and safety to patients by reason of . . . any mental or physical condition" as well as sexual misconduct with patients. 59 O.S.2011, § 509(15), (17). Further, the Act specifically authorizes the Board to impose additional discipline on those who engage in "willful violations of its orders." *Id.* § 513(B). Here, the Board heard evidence regarding alleged violations of its prior disciplinary order and found that the order had been violated. Further, the Board's order includes a pathway to the restoration of the license, which focuses on mental health and medical competence. The Board may reasonably believe that the suspension of the license with requirements for reinstatement is necessary to enforce the Board's prior disciplinary order.

It is, therefore, the official opinion of the Attorney General that the State Board of Medical Licensure and Supervision has adequate support for the conclusion that this action advances the State of Oklahoma's policy requiring medical doctors observe standards of professionalism.

A handwritten signature in black ink, appearing to read "Scott Pruitt". The signature is stylized with a large initial "S" and a prominent "P".

E. SCOTT PRUITT
ATTORNEY GENERAL OF OKLAHOMA