

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

**STATE OF OKLAHOMA, *ex rel.*,
THE OKLAHOMA STATE BOARD
OF MEDICAL LICENSURE AND
SUPERVISION,**)

Plaintiff,)

vs.)

Case No. 21-09-6049

**JUSTIN GRAHAM DOCKENDORF, M.D.,
LICENSE NO. MD 2366,**)

Defendant.)

VERIFIED COMPLAINT

The State of Oklahoma, *ex rel.*, the Oklahoma State Board of Medical Licensure and Supervision (“Board”), alleges and states as follows for its Complaint against JUSTIN GRAHAM DOCKENDORF, M.D. (“Defendant”):

I. JURISDICTION

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 holds Oklahoma medical license number 2366. The acts and omissions complained of herein were made while Defendant was acting as a physician pursuant to the medical license conferred upon him by the State of Oklahoma, and such acts and omissions occurred within the physical territory of the State of Oklahoma.

II. BOARD HISTORY

III. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

3. On or about September 15, 2021, a complaint was filed online on behalf of patient C.I. The complaint alleged C.I. obtained an initial prescription for 180 Lortabs from Defendant who is friends with the patient. The complaint goes on to say that the medications are being given without any medical documentation being kept on the patient. The Complainant stated that this started in July 2019. Complainant then stated that the patient has been on Lortab and Xanax and is abusing both. Complainant alleged patient C.I. has been falling asleep when inappropriate or not sleeping when they should, slurring, forgetting, and is very agitated and irritable.

4. Six (6) patient records were subpoenaed, including patient C.I. There are numerous problems with the care and record keeping provided by Defendant. Records kept by Defendant are extremely sparse and lack information of vital signs, examination, and assessment/plan of treatment and adequate justification for treatment and prescriptions given. Further, Defendant simultaneously prescribes full opioid agonist in concert with Buprenorphine.
5. The records were sent for expert review, a report of which was subsequently provided to the Board Staff. The expert determined that Defendant's treatment was well below the standard of care, and in many instances, grossly inadequate.

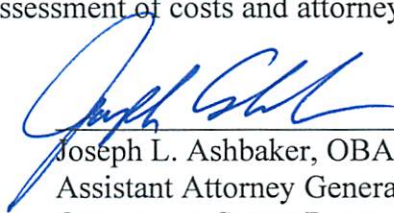
III. VIOLATIONS

6. Based on the foregoing, the Defendant is guilty of unprofessional conduct as follows:
 - a. Prescribing, dispensing or administering of controlled substances or narcotic drugs in excess of the amount considered good medical practice, in accordance with published standards in violation of Title 59 § 509(16)(a) and OAC 435:10-7-4(2),
 - b. Failure to maintain an office record for each patient which accurately reflects the evaluation, treatment and medical necessity of treatment of the patient in violation of Title 59 § 509(18):
 - c. Failure to provide a proper and safe medical facility setting and qualified assistive personnel for a recognized medical act, including but not limited to an initial in-person patient examination, office surgery, diagnostic service or any other medical procedure or treatment. Adequate medical records to support diagnosis, procedure, treatment or prescribed medications must be produced and maintained in violation of Title 59 § 509(20) and OAC 435:10-7-4(41):
 - d. Indiscriminate or excessive prescribing, dispensing or administering of Controlled or Narcotic Drugs in violation of OAC 435:10-7-4(1):
 - e. Dispensing, prescribing or administering a Controlled substance or Narcotic drug without medical need in violation of OAC 435:10-7-4(6):
 - f. Conduct likely to deceive, defraud, or harm the public in violation of OAC 435:10-7-4(11).
 - g. Improper management of medical records 435:10-7-4(36),

CONCLUSION

Given the foregoing, the undersigned 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 the

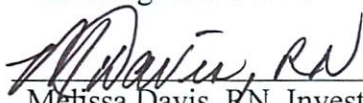
Defendant's professional license, including an assessment of costs and attorney's fees incurred in this action as provided by law.


Joseph L. Ashbaker, OBA No. 19395
Assistant Attorney General
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION
313 NE 21ST Street
Oklahoma City, Oklahoma 73105
405/522.2974
405/522.4536 – Facsimile

VERIFICATION

I, Melissa Davis, RN, under penalty of perjury, under the laws of the State of Oklahoma, state as follows: I have read the above Complaint regarding the Defendant, JUSTIN GRAHAM DOCKENDORF, M.D.; and

The factual statements contained therein are true and correct to the best of my knowledge and belief.


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

Date: 3-30-22