

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

STATE OF OKLAHOMA, *ex rel.*)
OKLAHOMA STATE BOARD)
OF MEDICAL LICENSURE)
AND SUPERVISION,)
)
Plaintiff,)
)
v.)
)
EDWARD GERARD MELTON, M.D.)
LICENSE NO. MD 24098,)
)
Defendant.)

FILED

DEC 07 2021

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 21-09-6046

VERIFIED COMPLAINT

The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision (“Board”), for its Verified Complaint against Edward Gerard Melton, M.D. (“Defendant”), alleges and states as follows:

I. JURISDICTION

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 and surgeons in the State of Oklahoma. 59 O.S. § 480, *et seq.* and Okla. Admin. Code 435:5-1-1 *et seq.*
2. In Oklahoma, Defendant holds medical license no. 24098.
3. The acts and omissions complained of herein were made while Defendant was licensed to practice medicine by the State of Oklahoma.

II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

4. This action arises out of complaints related to conduct by Defendant, as follows:
 - a. Defendant made inappropriate comments to K.H., a patient, that were flirtatious or sexual in nature.
 - b. Defendant carried on a personal, sexual relationship with T.G., a patient to whom he prescribed Schedules II and IV medications at least 27 times from 2015-2020.

- c. On at least one occasion, Defendant prescribed controlled substances without sufficient examination and the establishment of a valid physician-patient relationship and/or Defendant failed to maintain adequate records to support his treatment and prescribing of controlled substances.

III. VIOLATIONS

5. Based on the foregoing, Defendant is guilty of unprofessional conduct as follows:
 - a. Engaging in 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 O.S. §509(17).
 - 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 59 O.S. §509(18).
 - c. Conduct likely to harm the public, in violation of Okla. Admin. Code § 435:10-7-4(11).
 - d. Improper management of medical records, in violation of Okla. Admin. Code § 435:10-7-4(36).
 - e. Engaging in predatory sexual behavior, in violation of Okla. Admin. Code § 435:10-7-4(45).
 - f. Failure to establish a physician/patient relationship prior to providing patient-specific medical services, care or treatment, in violation of Okla. Admin. Code § 435:10-7-4(49).

IV. CONCLUSION

Given the foregoing, the undersigned 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 suspension or revocation and any other appropriate action with respect to Defendant's professional license, including an assessment of costs and attorney's fees incurred in this action as provided by law.

Respectfully submitted,



Amanda E. Everett, OBA # 30107
Assistant Attorney General
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION
101 N.E. 51st Street
Oklahoma City, Oklahoma 73105
405.962.1400
Amanda.Everett@oag.ok.gov

VERIFICATION

I, Robbin Roberts, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

1. I have read the above Complaint regarding **EDWARD GERARD MELTON, MD**,
and,
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.

Robbin Roberts
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Executed this ____ day of _____, 2021, in Oklahoma County, State of Oklahoma.


Respectfully submitted,

Amanda E. Everett, OBA # 30107
Assistant Attorney General
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION
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Robbin Roberts
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Executed this 30th day of November, 2021, in Oklahoma County, State of Oklahoma.