



two years, then placed in an assisted living facility in OKC for approximately two years. Although during this time M.C. ceased being Defendant's patient, the two remained friends.

7. Upon leaving her assisted living facility, M.C. returned to her Tulsa home which was just a few blocks from Defendant's clinic and M.C. became Defendant's patient again. In 2017, Defendant placed M.C. on Methadone for chronic pain and Clonazepam for severe anxiety and continued to see her on a regular basis from 2017 through 2020.
8. From approximately mid-2022 to mid-2023, Defendant would routinely see M.C. in her home but failed to make any corresponding physicians notes in her chart at the clinic.
9. Defendant readily admits to continued prescribing of controlled substances (Methadone and Clonazepam) in a regularly scheduled manner with the absence of drug screens and EMR documentation for a period of about one year.
10. Per PMP Patient History Results dated January 1, 2017 – July 24, 2024, Defendant did appropriate and timely PMP checks on M.C.

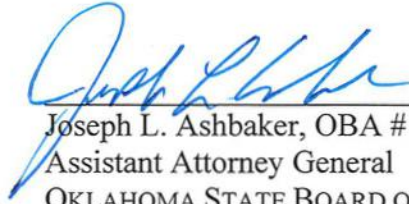
### **III. VIOLATIONS**

11. Based on the foregoing, Defendant is guilty of unprofessional conduct as follows:
  - a. 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).
  - b. Improper management of medical records, in violation of Okla. Admin. Code § 435:10-7-4(36).
  - c. Failure to provide a proper setting and assistive personnel for medical act, including but not limited to examination, surgery, or other treatment. Adequate medical records to support treatment or prescribed medications must be produced and maintained, in violation of Okla. Admin. Code § 435:10-7-4(41).

### **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,



Joseph L. Ashbaker, OBA # 19395

Assistant Attorney General

OKLAHOMA STATE BOARD OF MEDICAL  
LICENSURE AND SUPERVISION

101 N.E. 51<sup>st</sup> Street

Oklahoma City, Oklahoma 73105

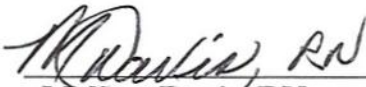
405.962.1400

joe.ashbaker@oag.ok.gov

**VERIFICATION**

I, Melissa Davis, RN, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

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



Melissa Davis, RN

OKLAHOMA STATE BOARD OF MEDICAL  
LICENSURE AND SUPERVISION

Executed this 1<sup>st</sup> day of October, 2024, in Oklahoma County, State of Oklahoma.