

**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.** )  
 )  
**ELIZABETH ROMANIK KINZIE, M.D.,** )  
**LICENSE NO. MD 25482,** )  
 )  
**Defendant.** )

**FILED**

JUL 12 2023

OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE & SUPERVISION

**Case No. 22-04-6119**

**VERIFIED COMPLAINT**

The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision (“Board”), for its Verified Complaint against Elizabeth Romanik Kinzie, 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. Defendant holds medical license No. 25482, issued 03/15/2007 by the Oklahoma Board of Medical Licensure and Supervision. The acts and/or omissions complained of herein were made while Defendant was licensed to practice medicine by the State of Oklahoma.

**II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT**

3. This action arises out of unprofessional conduct by Defendant as detailed herein. The Board originally received a complaint asserting allegations that Defendant had been prescribing multiple sedatives and respiratory depressants to a patient with a known history of self-administered medication overdose. After reviewing the patient’s medical records, Board staff became concerned regarding Defendant’s simultaneous prescribing of various controlled dangerous substances.
4. Based on these concerns, Board staff subpoenaed medical records for ten (10) of Defendant’s patients, four (4) of which were randomly selected and provided to an expert for review. The expert determined that for all four (4) patients Defendant had concurrently prescribed multiple controlled dangerous substances with only cursory and/or vague

clinical indications, and further failed to conduct any thorough psychiatric assessment which would have comported with the relevant standard of care. Compounding this misconduct, Defendant was determined to have prescribed various sedatives and stimulants despite all four (4) patients' known history of substance use dependence and/or misuse/disorder. Accordingly, the expert determined that these practices were inconsistent with or in violation of the appropriate standard(s) of care.

### III. VIOLATIONS

5. Based on the foregoing, 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 violation of 59 O.S. 509(16)(a) and Okla. Admin. Code § 435:10-7-4(2).
  - b. Indiscriminate or excessive prescribing, dispensing or administering of controlled or narcotic drugs, in violation of Okla. Admin. Code § 435:10-7-4(1).
  - c. Prescribing or administering a drug or treatment without sufficient examination and the establishment of a valid physician-patient relationship and not prescribing in a safe, medically accepted manner, in violation of 59 O.S. 509(12).
  - d. 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).
  - e. Failure to maintain adequate medical records to support diagnosis, procedure, treatment or prescribed medications, in violation of 59 O.S. § 509(21) and Okla. Admin. Code § 435:10-7-4(41).

### V. 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,



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OKLAHOMA STATE BOARD OF MEDICAL  
LICENSURE AND SUPERVISION  
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**VERIFICATION**

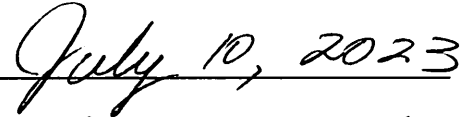
I Melissa Davis, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

1. I have read the above Complaint regarding Elizabeth Romanik Kinzie, M.D.; and
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.



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

Date:



  
\_\_\_\_\_  
County, State of Execution