

Adderall since 2010 from Diana Chen, M.D., and Candy Ting, D.O.

5. On or about August 26, 2013, Board Investigator SW met with Defendant wherein he **admitted to forging Dr. Dona Veal's signature** on two prescriptions:

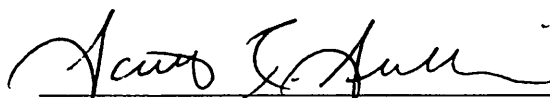
*Depakote 100 mg, 30 tablets, dated August 13, 2013; and
Adderall 10 mg. C-II, 30 tablets, dated August 13, 2013.*

6. Defendant is guilty of unprofessional conduct in that he engaged in:
- a) Committed any act which is a violation of the criminal laws of any state when such act is connected with the physician's practice of medicine in violation of Title 59 O.S. §509(9);
 - b) Violated a state or federal law or regulation regulating to controlled substances in violation of Oklahoma Administrative Code Rule 435:10-7-4-(27) and Title 63 O.S. §2-402, §2-404, §2-406 and §2-407 and Oklahoma Administrative Code Rule 435:25-1-3 and Oklahoma Administrative Code Rule 435:30-1-3;
 - c) Wrote a false or fictitious prescription for any drugs or narcotics declared by the laws of this state to be controlled in violation of Title 59 O.S. §509(11);
 - d) Purchased or prescribed a regulated substance in Schedules I through V for the physician's person use in violation of Oklahoma Administrative Code Rule 435:10-7-4(5);
 - e) Prescribed, sold, administered, distributed, ordered or gave a drug legally classified as a controlled substance or recognized as an addictive dangerous drug to himself or herself in violation of Oklahoma Administrative Code Rule 435:10-7-4-(26); and
 - f) Engaged in the use of any false, fraudulent, or deceptive statement in any document connected with the practice of medicine and surgery in violation of Oklahoma Administrative Code Rule 435:10-7-4-(19).

CONCLUSION

WHEREFORE, the Plaintiff respectfully requests that 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 medical license, and an assessment of costs and attorney's fees incurred in this action as provided by law.

Respectfully submitted,



Scott Randall Sullivan, OBA #11179
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION
101 N.E. 51st Street
Oklahoma City, OK 73105

Attorney for Plaintiff