

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

**FILED**

STATE OF OKLAHOMA, *ex rel.* )  
THE OKLAHOMA STATE BOARD )  
OF MEDICAL LICENSURE AND )  
SUPERVISION, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
TIMOTHY SHAUN BREEDLOVE, M.D. )  
LICENSE NO. 29758, )  
 )  
 )  
Defendant. )

JUL - 7 2014

OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE & SUPERVISION

Case No. 14-06-4997

**COMPLAINT**

The State of Oklahoma, *ex rel.* the Oklahoma State Board of Medical Licensure and Supervision (the "Board"), alleges and states for its Complaint against the Defendant, Timothy Shaun Breedlove, M.D.:

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 O.S. § 480, *et seq.*
2. The Defendant, Timothy Shaun Breedlove, M.D., holds Oklahoma medical license no. 29758.

**History with the Board**

3. On June 27, 2013, the Defendant voluntarily entered into an Agreement for Licensure with this Board on June 27, 2013. Also on that same date, the Defendant signed a five-year contract with Oklahoma Health Professionals Program ("OHPP") wherein he was required to participate in SoberLink monitoring and attend the regular support group meetings.

### Violation of Agreement

4. Between June 27, 2013 and September of 2013, the Defendant did not attend any Oklahoma Caduceus meetings nor did OHPP receive any confirmation from any other state saying Dr. Breedlove attended their Caduceus meetings. Further, the Defendant's credit card charges for the SoberLink device were declined for two months.
5. On September 11, 2013, OHPP received an email from the Defendant stating his wife had left him and emptied his accounts.
6. On September 27, 2013, the Defendant stopped using the SoberLink Device.
7. On October 8, 2013, OHPP sent correspondence to the Defendant discharging him from OHPP and asking that he return the SoberLink device and pay the amount due of \$465.00.
8. On or about October 22, 2013, the Defendant was again emailed by OHPP stating he must return the SoberLink device and pay the outstanding balance of \$465.00
9. On or about May 19, 2014, the Defendant emailed OHPP stating he had an opportunity to work in Oklahoma and he inquired as to what steps he needed to take to "obtain his license."
10. On July 12, 2014, OHPP received the Defendant's SoberLink device.
11. On or about June 13, 2014, Jeff Shelton with Newman Memorial Hospital paid the \$465.00 past due monitoring fees on behalf of the Defendant.
12. The Defendant is in violation of the following terms of the Agreement for Licensure entered into on September 27, 2013:

Term 6: Applicant will keep the Board informed of his current address;

Term 16: Applicant will submit any required reports and forms on a timely, accurate and prompt basis to the Compliance Coordinator or designee;

Term 17: Applicant will abide by all recommendations of and any post care contracts with the Kansas Medical Assistance Recovery Network;

Term 19: Applicant will sign a contract with and attend a minimum of one (1) meeting per week of the Oklahoma Health Professionals Program – OHPP; and

Term 20: Applicant will additionally attend two (2) meetings per week of Alcoholics Anonymous (“AA”).

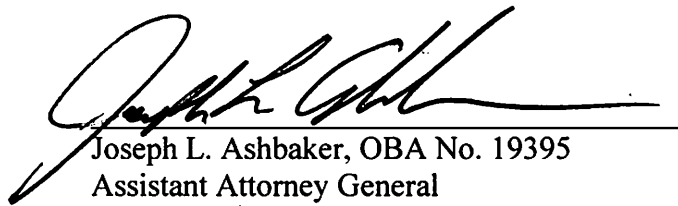
13. The Defendant is guilty of unprofessional conduct in that he is in:

Violation of any provision(s) of the medical practice act or the rules and regulations of the Board or of any action, stipulation or agreement of the Board as stated in Oklahoma Administrative Code § 435:10-7-4(39).

### Conclusion

Given the foregoing, the undersigned requests that a hearing be conducted 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, and an assessment of costs and attorney’s fees incurred in this action as provided by law.

Respectfully submitted,



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Licensure and Supervision*