

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.)
)
DAVID ARI BLOOM, M.D.)
LICENSE NO. MD 30136,)
)
Defendant.)

FILED

AUG 23 2021

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 21-04-5991

VERIFIED COMPLAINT

The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision (“Board”), for its Verified Complaint against David Ari Bloom, 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. 30136.
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 disciplinary action taken by the California Board of Medicine resulting in a *Decision After Non-Adoption* being entered on June 11, 2021 wherein the following findings were made:
 - a. Defendant’s treatment of patient A constituted gross negligence as it was an extreme departure from the standard of care.
 - b. Defendant’s treatment [of] Patient A constituted repeated acts of negligence.

- c. Defendant failed to maintain adequate and accurate records related to his treatment of Patient A.
5. As a result, after a hearing was held on the initial *Accusation* filed in 2018, Defendant's California license was placed on probation for a period of five years, with the following terms and conditions calculated to protect the public:
 - a. Defendant was to, within 60 days, enroll in an approved clinical competence assessment program, and complete said program no later than six months after Defendant's initial enrollment. Defendant was to subsequently participate in an approved professional enhancement program, which included quarterly chart review, semi-annual practice assessment, and semi-annual review of professional growth and education, at Defendant's own expense.
 - b. Defendant was ordered to perform and submit proof annually of 40 additional hours of pre-approved Continuing Medical Education (CME) requirements above those required for license renewal.
 - c. Defendant was ordered to enroll in and attend a pre-approved course in medical record keeping, in addition to the CME requirements for renewal of licensure.
 - d. Defendant was ordered to complete a Professionalism Program (Ethics Course), in addition to the CME requirements for renewal of licensure.
 - e. Defendant was further ordered to have his practice monitored by a qualified and approved licensed physician or surgeon in Defendant's field of practice.
 - f. Defendant was prohibited from engaging in the solo practice of medicine, from supervising physician assistants, and was ordered to obey all laws, Board orders and probation conditions, and to submit quarterly declarations confirming compliance with probation conditions.
6. The *Decision After Non-Adoption* recited the relevant history, which supported the Board's findings recited in paragraph 4, subsections (a), (b), and (c), above.

III. VIOLATIONS

7. Based on the foregoing, Defendant is guilty of unprofessional conduct as follows:
 - a. Disciplinary action of another state or jurisdiction against a license or other authorization to practice medicine and surgery based upon acts of conduct by the licensee similar to acts or conduct that would constitute grounds for action as defined in this section, a certified copy of the record of the action taken by the other state or jurisdiction being conclusive evidence thereof, in violation of Okla. Admin. Code § 435:10-7-4(31).

- b. Gross or repeated negligence in the practice of medicine, in violation of Okla. Admin. Code § 435:10-7-4(15).
- c. Conduct likely to harm the public, in violation of 59 O.S. §509(8) and Okla. Admin. Code § 435:10-7-4(11).
- 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).

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
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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 **DAVID ARI BLOOM, 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 20th day of August, 2021, in Oklahoma County, State of Oklahoma.