

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.)
)
DONALD AUGUSTUS GUTHRIE,)
LICENSE NO. PA 343,)
)
Defendant.)

FILED

JUL 09 2021

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 21-04-5981

VERIFIED COMPLAINT

The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision ("Board"), alleges and states as follows for its Complaint against **DONALD AUGUSTUS GUTHRIE, P.A.** ("Defendant"):

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 Physician Assistants in the State of Oklahoma. **59 O.S. §519.3, et seq.** and **Okla. Admin. Code 435:15-5-11.**
2. In Oklahoma, Defendant holds Oklahoma Physician Assistant (P.A.) license no. 343.

II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

3. Between April 9, 2020 and March 5, 2021, Defendant prescribed Testosterone, a Schedule III Drug, to his own son at least 9 times.

III. VIOLATIONS

4. Based on the foregoing, **DONALD AUGUSTUS GUTHRIE, P.A.**, is guilty of unprofessional conduct as follows:
- a. Prescribing any drug legally classified as a controlled substance to a family member, in violation of Okla. Admin. Code 435:15-5-11(a)(4) and 435:10-7-4(26).
 - b. Violating any provision of the Medical Practice Act or the rules promulgated by the Board, in violation of Okla. Admin. Code 435:15-5-11(a)(4).
 - c. Engaging in unprofessional conduct, in violation of Okla. Admin. Code 435:15-5-11(b)(9).

IV. CONCLUSION

Given the foregoing, the undersigned respectfully request the Board to conduct a hearing, and upon proof of the allegation(s) contained herein, impose an appropriate punishment pursuant to the applicable law and rule on **DONALD AUGUSTUS GUTHRIE**, including an assessment of costs and attorneys' fees incurred in this action as provided by law.

Respectfully submitted,



Amanda E. Everett, OBA # 30107
Assistant Attorney General
OKLAHOMA STATE BOARD OF MEDICAL
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VERIFICATION

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

1. I have read the above Complaint regarding **DONALD AUGUSTUS GUTHRIE, P.A.**
and,
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.



Melissa Davis, R.N., Investigator
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Executed this 7th day of July, 2021, in Oklahoma County, State of Oklahoma.