

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

FILED

JUL 30 2024

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

STATE OF OKLAHOMA, *ex rel.*,
THE OKLAHOMA STATE BOARD
OF MEDICAL LICENSURE AND
SUPERVISION,

Plaintiff,

vs.

ADAM LYMAN LARSON, M.D.,
LICENSE NO. MD 39461,

Defendant.

Case No. 24-03-6301

VERIFIED COMPLAINT

The State of Oklahoma, *ex rel.*, the Oklahoma State Board of Medical Licensure and Supervision (“Board”), alleges and states as follows for its Complaint against ADAM LYMAN LARSON, M.D. (“Defendant”):

I. JURISDICTION

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 Okla. Stat. § 480 *et seq.*
2. Defendant, holds Oklahoma medical license number 39461. The acts and omissions complained of herein were made while Defendant possessed a valid and active medical license conferred upon him by the State of Oklahoma.

II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

3. The Utah Medical Board reported to the National Practitioner Data Bank (“NPDB”) that on January 3, 2024, Defendant voluntarily surrendered his Utah Medical License due to acts or conduct similar to acts or conduct that would constitute grounds for action in Oklahoma.
4. The NPDB report explains that Defendant failed to comply with the standard of care in the therapeutic use of subanesthetic Ketamine of the American Society of Ketamine Physicians, Psychotherapists and Practitioners. Specifically, he was the medical director and permitted staff, who were registered nurses, to perform non-ablative cosmetic medical procedures in the absence of general cosmetic medical procedure supervision in violation of Utah “code’s”.

5. Utah's Division of Professional Licensing of the Department of Commerce's eleven (11) page Stipulation and Order describes their investigation in detail. In it, Defendant neither admitted nor denied the allegations, however, agreed that the "Division" entered the findings of fact. Among those were:

- That, as the medical director of a med-spa, Defendant failed to maintain complete medical records including physician orders and standing orders for Ketamine, Ketamine Troches, IV wellness drips and Botox and fillers.
- That Defendant allowed staff, upon receiving controlled substances from pharmacies, to dispense the controlled substances to patients other than the patients for whom the prescriptions were written and dispense the controlled substances to the patients in a different strength than Defendant had ordered.
- That Defendant allowed staff to deliver, directly to patients, the controlled substances that were received from the pharmacies, when the staff were not licensed to do so.
- That Defendant permitted approximately 260,000 mg of ketamine to be dispensed in troche form to patients without prescriptions being issued for said medication.
- That Defendant permitted staff to use a signature stamp to issue CDS prescriptions without Defendant's authorization.
- That Defendant issued "high risk" prescriptions to patients for benzodiazepines in quantities to be used by patients for longer than thirty days without first verifying in the Utah Controlled Substance Database that the patient did not have a currently active "high risk" prescription for benzodiazepines from a different practitioner.
- That Defendant misrepresented an employee's qualifications on company website.
- That Defendant failed to perform thorough medical assessments before deciding if patients were appropriate for Ketamine Therapy.
- That Defendant failed to perform or obtain thorough psychiatric evaluations before deciding if patients were appropriate for Ketamine Therapy.
- That Defendant failed to follow basic safety guidelines for monitoring patients during treatment including monitoring heart rate, pulse ox and blood pressure and level of consciousness.
- That Defendant failed to perform ongoing assessments to monitor for adverse effects of Ketamine therapy.
- That Defendant failed to keep appropriate documentation including what medications were given and in what doses.

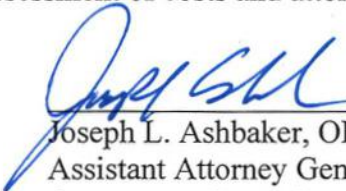
- That Defendant permitted staff, who were registered nurses, to perform non-ablative cosmetic medical procedures in the absence of general cosmetic medical procedure supervision.
6. Utah imposed a \$5,000 fine and allowed Defendant to surrender his license to practice medicine, without the right to reapply for five (5) years.

III. VIOLATIONS

7. Based on the foregoing, the 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 thereof in violation of OAC 435:10-7-4(31):

CONCLUSION

Given the foregoing, the undersigned 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 the Defendant's professional license, including an assessment of costs and attorney's fees incurred in this action as provided by law.



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OKLAHOMA STATE BOARD OF MEDICAL
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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 the Defendant, ADAM LYMAN LARSON, M.D.; and

2. The factual statements contained therein are true and correct to the best of my knowledge and belief.



Robbin Roberts, Investigator
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Date: 7-25-24