

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. Case No. 87-5-504

ALLEN HENRY BUNCH, M.D.,
Medical License No. 6117,)
Defendant.)

COMPLAINT

COMES NOW J.G. Landreth, Inspector for the Oklahoma State Board of Medical Licensure and Supervision, being first duly sworn upon oath and states:

1. That Allen Henry Bunch, M.D., holding Oklahoma Medical License No. 6117, is in violation of the Oklahoma Medical Practice Act, 59 O.S. 1981, Sec. 509, Paragraphs 13 and 17, to-wit:

"13. Prescribe or administer a drug or treatment without sufficient examination and the establishment of a valid physician/patient relationship."

"17. Prescribing, dispensing or administering of controlled substances or narcotic drugs in excess of the amount considered good medical practice or prescribing, dispensing or administering controlled substances or narcotic drugs without medical need in accordance with published standards."

2. That Allen Henry Bunch, M.D., is in violation of the Rules and Regulations promulgated by the this Board, specifically Section IX, Rules 1, 2 and 6, to-wit:

"Rule 1: Indiscriminate or excessive prescribing, dispensing or administering of controlled or narcotic drugs."

"Rule 2: Prescribing, dispensing or administering of controlled or narcotic drugs in excess of the amount considered good medical practice."

Rule 6: Dispensing, prescribing or administering a controlled substance or narcotic drug without medical need."

3. That on or around May 6, 1986, Agent Danny Lyon of the Oklahoma State Bureau of Narcotics and Dangerous Drugs entered the office of Defendant and paid \$20.00 for an office call to see

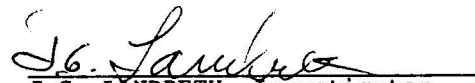
the Defendant. That Mr. Lyon, using the name Jerry Stewart, told the Defendant he wished to obtain a prescription for "bird eggs." Defendant stated he was not familiar with that term and the Defendant then looked in a copy of the Physicians Desk Reference for a picture of Adipex-P. Defendant asked Agent Lyon if the picture looked like "bird eggs." Mr. Lyon replied affirmatively, and Defendant gave this agent a prescription for 45 dosage units of Adipex-P and Defendant weighed the agent and checked the agent's blood pressure

4. That on or around May 15, 1986, Agent Lyon, again using the name Jerry Stewart, entered the Defendant's office, paid a \$20.00 office call and asked the Defendant for a refill on the previously obtained prescription for Adipex-P and the Defendant did write Agent Lyon a prescription for 60 dosage units of Adipex-P and did not perform any other examination or evaluation.

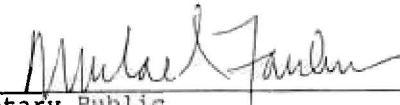
5. That on or around August 27, 1986, Agent Lyon again entered the Defendant's office, paid a \$20.00 office call, and met with the Defendant and requested a refill of the prescription for Adipex-P and the Defendant wrote a prescription for 45 dosage units of Adipex-P.

6. That Adipex-P is a narcotic drug and a controlled dangerous substance and Agent Lyon did not present to the Defendant any medical need for this controlled dangerous substance.

WHEREFORE, Complainant prays this Board to conduct a hearing and upon proof of the allegations contained herein that such disciplinary action be taken by the Board as is authorized by


J.G. LANDRETH, Investigator
State Board of Medical Licensure
and Supervision

Subscribed and sworn to before me this 3rd day of August,


Notary Public

My commission expires:
10-3-90