

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.

RALPH R. ROBINSON, M.D.
Medical License No. 6617

CASE NO. 88-9-676

Defendant

COMPLAINT

COMES NOW Mike Fairless, Chief Investigator for the Oklahoma State Board of Medical Licensure and Supervision, being first duly sworn upon oath and states:

1. That Ralph R. Robinson, M.D., holding Oklahoma Medical License No. 6617, is in violation of the Oklahoma Medical Practice Act, 59 O.S. 1981, Sec. 509, Paragraph 17, to-wit:

"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."

That Ralph R. Robinson, M.D., is in violation of the Rules and Regulations promulgated by 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 March 24, 1988, Defendant did voluntarily enter into an Agreed Order with the Commonwealth of Kentucky, State Board of Medical Licensure, wherein the Defendant

was placed on probation for a period of five (5) years under terms and conditions to not prescribe, administer or dispense certain Schedules of controlled dangerous substances and to obtain continuing medical education in the area of pharmacology at the rate of fifteen (15) hours per year for the first two (2) years of probation and to reimburse the Kentucky Board of its investigative costs expended. A certified copy of the Agreed Order and the Complaint that was the basis of that Order are attached hereto and marked Exhibit A.

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 law.



MIKE FAIRLESS, Chief Investigator
State Board of Medical Licensure
and Supervision

Subscribed and sworn to before me this 4 day of January, 1989.

Janet L. Owens
Notary Public

My Commission expires:
12-17-92