

**IN AND BEFORE THE OKLAHOMA STATE BOARD
OF EXAMINERS OF PERFUSIONISTS
STATE OF OKLAHOMA**

FILED

NOV 4 2003

**STATE OF OKLAHOMA
EX REL. THE OKLAHOMA STATE BOARD OF
EXAMINERS OF PERFUSIONISTS,**

Plaintiff

v.

**COLETTE SUZANNE CALAME, LP,
OKLAHOMA PERFUSIONIST LICENSE NO. 6,**

Defendant.

Case No. 03-05-2671

COMPLAINT

COMES NOW the plaintiff, the State of Oklahoma ex rel. the Oklahoma State Board of Examiners of Perfusionists (the "Board"), by and through its attorney, Elizabeth A. Scott, Assistant Attorney General, and for its Complaint against the Defendant, Colette Suzanne Calame, LP, Oklahoma perfusionist license no. 6, alleges and states as follows:

1. The Board is a duly authorized agency of the State of Oklahoma empowered to license and oversee the activities of perfusionists in the State of Oklahoma pursuant to 59 Okla. Stat. §2051 *et seq.*

2. Defendant, Colette Suzanne Calame, LP, holds Oklahoma perfusionist license no. 6.

3. On or about May 25, 2003, Defendant was admitted to Midwest Regional Medical Center based upon a self-inflicted overdose of propofol. She also had in her possession pancuronium and IV apparatus when found by paramedics. Defendant was hospitalized for approximately two (2) weeks.

4. Defendant is guilty of unprofessional conduct in that she:


- A. Is unfit or incompetent by reason of negligence, habits, or other cause of incompetence in violation 59 O.S. 407 §2067(2).
- B. Is addicted to, or has improperly obtained, possessed, used, or distributed habit-forming drugs or narcotics in violation of 59 O.S. §2067(4).
- C. Is guilty of dishonest or unethical conduct in violation of 59 O.S. §2067(5).

Conclusion

WHEREFORE, plaintiff requests that 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 the revocation or suspension of the Defendant's license to practice as a perfusionist in the State of Oklahoma, the assessment of costs and fees incurred in this action, and any other appropriate action with respect to Defendant's license to practice as a perfusionist in the State of Oklahoma.

Dated this 4th day of November, 2003 at 9:30 a.m.

Respectfully submitted,


Elizabeth A. Scott, OBA #12470
Assistant Attorney General
State of Oklahoma
5104 N. Francis, Suite C
Oklahoma City, OK 73118

Attorney for the State of Oklahoma ex rel.
Oklahoma State Board of Examiners
of Perfusionists