

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.)
)
DAVID D. SNYDER, M.D.) CASE NO. 91-03-1161
Medical License No. 7094,)
)
 Defendant.)

COMPLAINT

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

1. That David D. Snyder, M.D., holding Oklahoma Medical License No. 7094, is in violation of the Oklahoma Medical Practice Act, 59 O.S. 1981, Sec. 509, Paragraphs 13 and 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 David D. Snyder, M.D., is in violation of Rules and Regulations promulgated by this Board, specifically Section X, Rules 1A, 1B, and 1F, to-wit:


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

3. That from approximately January 7, 1991, to June 17, 1991, Defendant did prescribe, administer or dispense controlled dangerous substances to his spouse, one M.A.S., without establishing a valid physician-patient relationship and in amounts considered in excess of the amount considered good medical practice.

4. That during the same time period, Defendant did prescribe to his spouse, one M.A.S., approximately 46 prescriptions for a total of 2,040 dosage units of Percocet 5mg., Tylox, Fiorinal, Vicodin 5mg., Carisproidol 350mg., Dalmene 30mg., Diazepam .05mg., Xanax .5mg., and Lomotil 2.5mg., for an average of 12.59 dosage units per day.

5. That Defendant is perpetuating significant harm to public health, safety, and welfare by continuing the acts and omissions set forth in the above allegations.

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.



JIM BIRDSONG, Investigator
State Board of Medical Licensure
and Supervision

Subscribed and sworn to before me this 14th day of August, 1991.



Notary Public

My Commission expires:
January 16, 1995