BEFORE THE BOARD OF MEDICAL EXAMINERS

STATE OF OKLAHOMA

STATE OF OKLAHOMA, ex rel. STATE BOARD OF MEDICAL EXAMINERS,

Plaintiff,

VS.

1 . .

DOUGLAS DOYN LEATHERMAN, M.D., Medical License No. 7303,

Defendant

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STATE BOARD MEDICAL EXAMINERS

COMPLAINT

COMES NOW D. C. MOSSHART, Inspector for the Board of Medical Examiners, State of Oklahoma, and being first duly sworn upon oath, states

1. That DOUGLAS DOYN LEATHERMAN, M.D., holding Oklahoma Medical License No. 7303, is in violation of the Oklahoma Medical Practice Act, 59 O.S. \$509, paragraphs 5 and 16, to-wit:

- "5. Habitual intemperance or the habitual use of habitforming drugs."
- "16. The inability to practice medicine with reasonable skill and safety to patients by reason of age, illness, drunkeness, excessive use of drugs, narcotics, chemicals, or any other type of material or as a result of any mental or physical condition."

2. That DOUGLAS DOYN LEATHERMAN, M.D., is in violation of the Rules and Regulations promulgated by this Board, specifically, Rule 3, to-wit

> "Rule 3. The habitual or excessive use of any drug which impairs the ability to practice medicine with reasonable skill and safety to the patient."

3. That based upon an investigation conducted by the undersigned Inspector for the Board of Medical Examiners, information would indicate that the Defendant, DOUGLAS DOYN LEATHERMAN, M.D., has been habitually taking the drug Stadol since October, 1981, in such a quantity as to impair his ability to practice medicine with reasonable skill and safety to the patient.

4. That on or about the 30th day of May, 1982, Dr. Leatherman was observed by hospital personnel at the Weatherford Hospital to be in an impaired state while engaged in the practice of medicine THEREFORE, premises considered, Complainant prays that a hearing be held and upon proof of the allegations contained herein that such action be taken by the Board as is authorized by law.

Dated this 16th day of August, 1982.

D. C. MOSSHART. (Complainant

Subscribed and sworn to before me this 167h day of August 1982

Alaymond Surfice

My Commission Expires:

<u>6-30-86</u> (SEAL)