

IN AND BEFORE THE STATE BOARD OF MEDICAL EXAMINERS

STATE OF OKLAHOMA

STATE OF OKLAHOMA, ex rel,)
STATE BOARD OF MEDICAL)
EXAMINERS,)
)
) Plaintiff,)
v)
)
LAWRENCE A. REED, M.D.,)
Medical License No. 7688,) CASE NO. 87-3-485
)
) Defendant.)

COMPLAINT

COMES NOW D.C. Mosshart, Investigator for the Oklahoma Board of Medical Examiners, being first duly sworn upon oath states:

1. That Lawrence A. Reed, M.D., holding Oklahoma Medical License No. 7688, is in violation of the Oklahoma Medical Practice Act, 59 O.S. 1981, §509, Paragraph 17, to-wit:

"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 Lawrence A. Reed, M.D., is in violation of 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 from June 29, 1986, through March 10, 1987,

approximately 9 prescriptions from the time of January 7, 1987, through March 4, 1987, for 510 dosage units of controlled or narcotic drugs for an average of 8.95 dosage units per day

5. That the survey reveals that patient P.J. received 12 prescriptions for controlled or narcotic drugs from January 9, 1987, through February 24, 1987, for a total of 406 dosage units for an average of 8.30 dosage units per day.

6. That the survey reveals that patient P.W. received 10 prescriptions for controlled or narcotic drugs from January 9, 1987, through February 25, 1987, for a total of 335 dosage units for an average of 6.98 dosage units per day.

7. That the survey reveals that patient G.Y. received 12 prescriptions for controlled or narcotic drugs from the period of January 7, 1987, through March 6, 1987, for a total of 390 dosage units for an average of 6.61 dosage units per day.

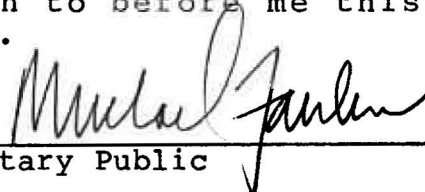
8. That the survey reveals that patient E.S. received 12 prescriptions for controlled or narcotic drugs from the period of December 10, 1986, through February 26, 1987, for a total of 510 dosage units for an average of 6.46 dosage units per day.

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.



D.C. MOSSHART, Investigator
State Board of Medical Examiners

Subscribed and sworn to before me this 1st day of April, 1987.



Notary Public