

IN AND BEFORE THE OKLAHOMA STATE BOARD  
OF MEDICAL LICENSURE AND SUPERVISION  
STATE OF OKLAHOMA

**FILED**

APR - 4 2008

STATE OF OKLAHOMA )  
EX REL. THE OKLAHOMA BOARD )  
OF MEDICAL LICENSURE )  
AND SUPERVISION, )

Plaintiff )

v. )

STEPHEN VANCE PAUL, P.A., )  
OKLAHOMA PHYSICIAN ASSISTANT )  
LICENSE NO. PA770, )

Defendant. )

OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE & SUPERVISION

Case No. 08-03-3477

COMPLAINT

COMES NOW the plaintiff, the State of Oklahoma ex rel. the Oklahoma State Board of Medical Licensure and Supervision (the "Board"), by and through its attorney, Elizabeth A. Scott, Assistant Attorney General, and for its Complaint against the Defendant, Stephen Vance Paul, P.A., Oklahoma physician assistant license no. PA770, 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 physician assistants in the State of Oklahoma pursuant to 59 Okla. Stat. §§480 and 519.1 *et seq.*

2. Defendant, Stephen Vance Paul, P.A., formerly held Oklahoma physician assistant license no. PA770.

3. On or about November 1, 2007, Defendant was disciplined by the Oklahoma State Board of Medical Licensure and Supervision (the "Board") based upon several incidents involving substance abuse, including two (2) arrests. After due notice and hearing, the Board suspended Defendant's license to practice as a physician assistant for a minimum of six (6) months and ordered that he must personally appear before the Board to request reinstatement.

4. On or about March 13, 2008, Defendant called in a prescription for Tramadol 50 mg. #120 for his wife, Julie Paul, at the CVS Pharmacy located in Mustang, Oklahoma. The pharmacist at CVS confirmed that when asked who his supervising physician was, Defendant gave the name Ray Trammell, M.D. at the Department of Corrections. When the pharmacist

could not confirm that Dr. Trammell was Defendant's supervising physician, he refused to fill the prescription.

5. After the CVS Pharmacy refused to fill the prescription, Defendant attempted to fill the same prescription for Tramadol 50mg. #120 for his wife, Julie Paul, at the Walgreens Pharmacy in Mustang, Oklahoma. The Walgreens pharmacist likewise refused to fill the prescription when he could not confirm that Dr. Trammell was Defendant's supervising physician.

6. The CVS pharmacist confirmed to Board investigators that on or about February 10, 2008, Defendant had called in Phenergan 25mg. #10 for his wife, Julie Paul, and had listed Ray Trammell, M.D. as his supervising physician.

7. Board investigators subsequently contacted Dr. Trammell, who confirmed that he had never called in any prescriptions for Julie Paul, that she was not a patient, and that he had had no contact with Defendant since June 2007.

8. On or about March 28, 2008, Board investigators met with Defendant. When asked if he had called in any prescriptions since he lost his license in November 2007, Defendant lied and stated "NO".

9. When Board investigators confronted him with the Phenergan prescription from February 2008, Defendant then admitted that he had in fact called in that prescription for his wife while he was suspended. Defendant additionally admitted that he had represented to the CVS Pharmacy that Ray Trammell, M.D. was his supervising physician when he knew that was not true. Defendant also admitted that while he was suspended, he had tried to call in the prescription for Tramadol for his wife, but the pharmacists at both CVS and Walgreens refused to fill it.

10. Board investigators then asked Defendant if he had driven himself to the Board offices for his interview, knowing that he had a suspended driver's license due to his most recent DUI in Canadian County. Defendant admitted that he had driven himself even though he had a suspended license. Defendant additionally admitted that if asked by the judge in Canadian County if he had driven with a suspended driver's license, he would lie to the judge.

11. Defendant is guilty of unprofessional conduct in that he:

- A. Engaged in dishonorable or immoral conduct which is likely to deceive, defraud, or harm the public in violation of 59 O.S. §509(8) and OAC 435:10-7-4(11).
- B. Violated a provision of the medical practice act or the rules and regulations of the Board or of an action, stipulation, or agreement of the Board in violation of OAC 435:10-7-4(39) and 435:15-5-11(7).

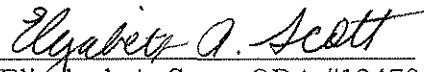
- C. Confessed to a crime involving violation of the laws of this state in violation of 59 O.S. §509(7).
- D. Failed to furnish the Board, its investigators or representatives, information lawfully requested by the Board in violation of OAC 435:10-7-4(37).

*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 physician assistant 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 physician assistant in the State of Oklahoma.

Dated this 4~~th~~ day of April, 2008 at 9:00 a.m.

Respectfully submitted,

  
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Oklahoma State Board of Medical  
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