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

STATE OF OKLAHOMA

RECEIVED

JUN 29 1990
OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE
AND SUPERVISION

STATE OF OKLAHOMA, ex rel,)
OKLAHOMA STATE BOARD OF)
MEDICAL LICENSURE AND)
SUPERVISION,)
)
Plaintiff,)
)
vs.)
)
LANNY G. ANDERSON, M.D.)
Medical License No. 7810,)
)
Defendant.)

CASE NO. 90-03-1033

VOLUNTARY SUBMITTAL TO JURISDICTION

COMES NOW the above-name Defendant, Lanny G. Anderson, M.D. (hereinafter referred to as "Defendant"), who holds Oklahoma Medical License No. 7810, and states as follows, to-wit:

(a) That he is of sound mind and is thinking clearly and handling his own affairs.

(b) That he is not under the influence of alcohol or any drug or medication or impaired therefrom.

(c) That he has consulted with, and is represented by legal counsel, William M. Jack, Oklahoma City, Oklahoma.

(d) That he has not been coerced or threatened in any way as regards to this proceeding.

(e) That he takes the following action voluntarily, of his own volition, fully understanding its consequences.

(f) That he is fully aware of the Complaint and Citation served upon him and acknowledges lawful service thereof.

(g) That he has been advised and understands his right to appear before the Oklahoma Board of Medical Licensure and Supervision en banc for evidentiary hearing, pursuant to 59 O.S. Supp. 1988, Section 504-507, on allegations raised in the Complaint and Citation.

After carefully considering the allegations made in the Citation and Complaint, weighing the potential evidence and discussing the matter thoroughly with his attorney, the Defendant

waives his right to an evidentiary hearing before the Oklahoma Board of Medical Licensure and Supervision. The Defendant neither admits nor denies, but chooses not to contest the allegations of the aforesaid Complaint and voluntarily submits to the jurisdiction of the Oklahoma State Board of Medical Licensure and Supervision insofar as it entails the following activities and restrictions:

1. That Defendant accepts and agrees to and does hereby begin a term of voluntary probation to the Oklahoma State Board of Medical Licensure and Supervision to continue for a period of five (5) years, unless earlier modified by the Board, on its own motion or on the motion of the Defendant, under the following terms and conditions:

- (a) During the period of probation Defendant will not prescribe, administer or dispense any medications for his personal use, to specifically include controlled dangerous substances.
- (b) During the period of Probation Defendant will take no medication except that which is authorized by a physician treating him for a legitimate medical need and Defendant shall have an affirmative duty to inform any physician treating him of Defendant's previous use of Dilaudid and Levo Dromoran.
- (c) During the period of probation Defendant will abstain from consuming alcohol or any substance, specifically including but not limited to controlled dangerous substances, which would adversely affect his ability to practice medicine or surgery as interpreted by the Oklahoma State Board of Medical Licensure and Supervision.
- (d) During the period of probation Defendant will submit biological fluid specimens to include, but not limited to, blood and urine, for analysis, upon request of any investigator or other agent representing the Oklahoma State Board of Medical Licensure and Supervision, and Defendant will pay for testing and analysis of those specimens.
- (e) During the period of probation Defendant will furnish to the office of the Oklahoma State Board of Medical Licensure and Supervision all current legal addresses and any change of address in writing.
- (f) That Defendant shall appear before the Board or a designated member thereof whenever requested to do so.
- (g) During the period of probation Defendant will submit

to the Investigation Division of the Oklahoma State Board of Medical Licensure and Supervision any required reports and forms on a timely and prompt basis.

- (h) Pursuant to Section 26, H.B. 1478, 1987 Legislature, Defendant shall promptly pay upon receipt of invoice from the Investigation Division of the Board the costs of investigation, prosecution and probation of this case.
- (i) During the period of probation Defendant shall notify any hospital where he holds staff privileges, or clinic, or group where he practices, of the terms and conditions of this Board Order and supply a copy thereof.
- (j) During the period of probation Defendant shall continue all in-patient and out-patient treatment by and through the Talbot Recovery System, Atlanta, Georgia, and shall authorize physicians at that institution and affiliated therewith to report to the Board periodically on Defendant's progress and to authorize his physicians to furnish copies of his treatment records to the Board for their review. Further, Defendant agrees to participate in such other recovery programs as may be recommended by Dr. J. Darrell Smith, Director of the Oklahoma State Medical Association Physicians' Recovery Program.
- (k) That violation of any of the terms and conditions of probation shall be grounds for additional charges to be presented to the Board after notice to the Defendant.

2. That the jurisdiction of the Board in this individual proceeding will continue until the terms and conditions of probation are modified or lifted by the Oklahoma Board of Medical Licensure and Supervision on their own motion or on the motion of the Defendant.

3. The Defendant further agrees that failure to meet any of the above terms of probation will constitute cause for the Board to initiate additional proceedings to suspend or revoke Defendant's Oklahoma Medical License, after additional due notice and hearing

4. It is specifically understood and agreed by the Defendant and the Oklahoma State Board of Medical Licensure and Supervision that the Defendant has entered into this Voluntary Submittal to Jurisdiction as a compromise settlement and that this instrument shall not be used in any other proceeding; and further

that by executing this Voluntary Submittal to Jurisdiction by way of compromise settlement, Defendant is making no admission of guilt as to any material allegation contained in the aforesaid Complaint.

I have read this instrument and understand same

Lanny G. Anderson M.D.
LANNY G. ANDERSON, M.D.
Medical License No. 7810

June Subscribed and sworn to before me this 27th day of
_____, 1990.

Betty J. Fox
Notary Public

My Commission expires:

October 22, 1990
(S E A L)

erson.vsj