

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.)

JOE BILLS REYNOLDS, M.D. CASE NO. 90-03-1036
Medical License No. 7938,

Defendant.

AMENDED COMPLAINT

COMES NOW J.G. Landreth, Investigator for the Oklahoma State Board of Medical Licensure and Supervision, being first duly sworn upon oath and states:

1. That Joe Bills Reynolds, M.D., formerly holding Oklahoma Medical License No. 7938, now under suspension, is in violation of the Oklahoma Medical Practice Act, 59 O.S. 1981, Sec. 509, Paragraphs 6 and 10, and for unprofessional conduct and 59 O.S. Supp. 1990, Sec. 513, to-wit:

"6. Conviction of a felony or of any offense involving moral turpitude."

"10. The conviction of an act which is a violation of the criminal laws of Oklahoma where such act is connected with the physician's practice of medicine."

Sec. 513:

"The license of any physician or surgeon who has been convicted of any felony in or without the State of Oklahoma and whether in a State or Federal court, and which conviction shall have become final, shall be suspended or revoked and canceled by said Board upon the submission thereof of a certified copy of the judgment and sentence of the trial court and the certificate of the clerk of said court that said conviction has become final; Provided, that the revocation of a license of any person convicted of a felony on any other grounds than that of moral turpitude or the violation of the Federal or State narcotic laws, shall be on the merits of the particular case, but the court records in the trial of such case when conviction has been had shall be prima facie evidence of the conviction."

2. That the Defendant performed surgical procedures on patients S.R., B.A., and J.C., and said procedures were performed in an unprofessional manner and in an unprofessional setting.

That on or around June 20, 1991, Defendant was convicted of the felony of Manslaughter in the Second Degree in the case State of Oklahoma v. Joe Bills Reynolds, Oklahoma County Case No. CF-90-2626, and that said conviction has become final and no appeal has been taken therefrom.

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

WHEREFORE, Complainant prays this Board to conduct a hearing for final disposition on this case and upon proof of the allegations contained herein that such disciplinary action be taken by the Board as is authorized by law.

J.G. Landreth
J.G. LANDRETH, Investigator
State Board of Medical Licensure
and Supervision

Subscribed and sworn to before me this 21st day of July, 1991.

Robert Althen
Notary Public

My Commission expires:
12-17-91