

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

FILED

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

JUN 07 2010

OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE & SUPERVISION

Plaintiff, )

v. )

Case No. 10-04-3979

BRUCE SCOT CARLTON, P.A., )  
LICENSE NO. PA871, )

Defendant. )

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, Bruce Scot Carlton, P.A., 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 *et seq.* and 887.1 *et seq.*

2. Defendant, Bruce Scot Carlton, P.A., holds Oklahoma physician assistant license no. PA871 and practices in Prague, Oklahoma.

3. In or around July 2004, Defendant completed approximately fourteen (14) weeks of inpatient treatment for substance abuse at the Metro Atlanta Residential Recovery program in Georgia. Defendant was treated for abuse of alcohol, Xanax, Hydrocodone, Ritalin and IV Stadol. Upon completion of treatment, Defendant signed a five (5) year contract to be monitored by the Oklahoma Health Professionals Recovery Program.

4. In or around January 2009, Defendant relapsed on alcohol. Defendant admits that in October, he purchased Xanax "on the street" and began abusing it. Defendant further admits that in December 2009, he obtained Lortab from a friend and ingested it.

5. From January 3, 2010 until March 17, 2010, Defendant obtained treatment at Palmetto Addiction Recovery Center.

6. Defendant is guilty of unprofessional conduct in that:
- A. He has violated a provision of the Medical Practice Act or the rules promulgated by the Board pursuant to OAC 435:15-5-11(a)(7).
  - B. He has 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).
  - C. He has violated any 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).
  - D. He habitually uses intoxicating liquors or habit-forming drugs in violation of OAC 435:15-5-11(a)(1), 59 O.S. §509(4) and OAC 435:10-7-4(3).
  - E. He is unable to practice medicine with reasonable skill and safety to patients by reason of age, illness, drunkenness, excessive use of drugs, narcotics, chemicals or any other type of material or as a result of any mental or physical condition in violation of 59 O.S. §509(15) and OAC 435:10-7-4(40).
  - F. He has violated or attempted to violate, directly or indirectly, any of the provisions of the Oklahoma Allopathic Medical and Surgical Licensure and Supervision Act, either as a principal, accessory or accomplice in violation of 59 O.S. §509(13).
  - G. He has confessed to a crime involving violation of the antinarcotic or prohibition laws and regulations of the federal government and the laws of this state in violation of 59 O.S. §509(7).

- H. He violated any state or federal law or regulation relating to controlled substances in violation of OAC 435:10-7-4(27).
- I. He prescribed, sold, administered, distributed, ordered, or gave any drug legally classified as a controlled substance or recognized as an addictive dangerous drug to a family member or to himself or herself in violation of OAC 435:10-7-4(26).
- J. He purchased or prescribed any regulated substance in Schedule I through V, as defined by the Uniform Controlled Dangerous Substance Act, for the physician's personal use in violation of OAC 435:10-7-4(5).

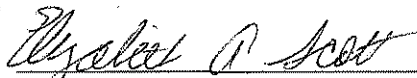
7. These allegations raise serious concerns about Defendant's ability to practice as a physician assistant in the State of Oklahoma with reasonable skill and safety.

*Conclusion*

WHEREFORE, the Plaintiff respectfully 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 suspension or revocation and any other appropriate action with respect to Defendant's physician assistant license, and an assessment of costs and attorney's fees incurred in this action as provided by law.

Dated this 7<sup>th</sup> day of June, 2010.

Respectfully submitted,

  
\_\_\_\_\_  
Elizabeth A. Scott (OBA #12470)  
Assistant Attorney General  
State of Oklahoma  
101 N.E. 51<sup>st</sup> Street  
Oklahoma City, OK 73105  
Attorney for the Plaintiff