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.

WILLIAM R. BULLOCK, M.D. Medical License No. 8754,

CASE NO. 93-10-1556

Defendant.

COMPLAINT

COMES NOW Jim Willis, Investigator for the Oklahoma State Board of Medical Licensure and Supervision, being first duly sworn upon oath and states:

- 1. That William R. Bullock, M.D., holding Oklahoma Medical License No. 8754, is in violation of the Oklahoma Medical Practice Act, 59 O.S. Supp. 1993, Sec. 509, Paragraphs 1, 8, and 12, to-wit:
 - "1. Procuring, aiding or abetting a criminal operation."
 - "8. Conviction or confession of a crime involving the violation of the anti-narcotic or prohibition laws and regulations of the Federal government or the Board of Health laws and regulations of the State of Oklahoma."
 - "12. The writing of false or fictitious prescriptions for any drugs or narcotics declared by the laws of Oklahoma to be controlled or narcotic drugs."
- 2. That from approximately January 6, 1993, to October 4, 1993, Defendant did sign 20 prescriptions (19 for controlled dangerous substances) to various patients, and Defendant did direct other office personnel, including (1) an insurance clerk and bookkeeper, (2) first year P.A. student, (3) lab technician, and (4) Licensed Practice Nurse, to sign Defendant's name to at least 11 additional prescriptions (10 for controlled dangerous substances).
- 3. That the aforesaid insurance clerk and bookkeeper, first year P.A. student, lab technician, and LPN are not

authorized under Oklahoma law to sign their name or Defendant's name to prescriptions for controlled dangerous substances and each of the instances set forth above constitutes unprofessional conduct and criminal violations of the narcotic laws of the State of Oklahoma, 63 O.S. 1991, Sec. 2-309, and Bureau of Narcotics Rule 600.03.

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

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.

JIM WILLIS, Investigator
Oklahoma State Board of

Medical Licensure and Supervision

Subscribed and sworn to before me this 17 day of Neconday, 1993.

Notaty Public Downs

My Commission expires: