## IN AND BEFORE THE STATE BOARD OF MEDICAL EXAMINERS STATE OF OKLAHOMA

STATE OF OKLAHOMA, ex rel, STATE BOARD OF MEDICAL EXAMINERS,

Plaintiff.

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OCT 15 1984

RONALD RAY SANDERS, M.D., Medical License No. 8769,

Defendant.

STATE BOARD ,MEDICAL EXAMINERS

## COMPLAINT

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COMES NOW D.C. Mosshart, Inspector for the Oklahoma Board of Medical Examiners, being first duly sworn upon oath and states:

- 1. That Ronald Ray Sanders, M.D., holding Oklahoma Medical License No. 8769, is in violation of the Oklahoma Medical Practice Act, 59 O.S. 1981, Section 509, Paragraphs 5 and 16, to-wit:
  - "5. Habitual intemperance or the habitual use of habit-forming drugs.
  - 16. The inability 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."
- 2 That Ronald Ray Sanders, M.D., is in violation of the Rules and Regulations promulgated by this Board, specifically Section IX, Rule 3, to-wit:
- "Rule 3: The habitual or excessive use of any drug which impairs the ability to practice medicine with reasonable skill and safety to the patient."
- 3. That from on or around July 2, 1984, Defendant had habitually and intemperately ingested large amounts of alcohol and had been found passed out in his own office and lying on a table in one of the examination rooms with the strong odor of alcohol on his person and later was observed to have slurred speech and a very unsteady gait.
- 4 That the Defendant's voluntary ingestion of alcohol has reached a point where he is unable to practice medicine with reasonable skill and safety to patients because of his excessive use of alcohol

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 s authorized by aw

D.C. MOSSHART, Inspector State Board of Medical Examiners

Subscribed and sworn to before me this 15th day of October, 1984.

My Commission expires: