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

FILED

STATE OF OKLAHOMA	)
EX REL. THE OKLAHOMA BOARD	) AUG 2 6 2005
OF MEDICAL LICENSURE	
AND SUPERVISION,	OKLAHOMA STATE BOARD OF MEDICAL LICENSURE & SUPERVISION
Plaintiff	)
	) Case No. 05-08-2983
RALPH EDWIN ADAMS, M.D.,	)
OKLAHOMA MEDICAL LICENSE NO. 9148,	)
	)
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, Ralph Edwin Adams, M.D., Oklahoma medical license no. 9148, 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 physicians and surgeons in the State of Oklahoma pursuant to 59 Okla. Stat. §480 *et seq*.

2. Defendant, Ralph Edwin Adams, M.D., holds Oklahoma medical license no. 9148.

3. On or about July 19, 2005, Defendant was disciplined by the Oregon Board of Medical Examiners whereby his license to practice medicine was suspended on an emergency basis based upon a finding that his continued practice represented an immediate danger to the public health, safety and welfare and that he lacked the competence to practice medicine safely. Specifically, the suspension was based upon a finding that Defendant failed to correctly interpret an abdominal ultrasound and misdiagnosed an 8 cm. aneurysm that subsequently ruptured. Defendant claimed that he knew his vision was impaired, yet he continued to practice medicine as a radiologist prior to his corrective surgery. The Oregon Board found that there were a significant number of errors both before and after his corrective surgery to call into question his overall competence to practice medicine.

- 4. Defendant is guilty of unprofessional conduct in that he:
  - A. Was subject to disciplinary action of another state or jurisdiction based upon acts or conduct by the licensee similar to acts or conduct that would constitute grounds for action as defined in this section pursuant to OAC 435:10-7-4(31).

## Conclusion

WHEREFORE, plaintiff 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 the revocation or suspension of the Defendant's license to practice as a physician and surgeon in the State of Oklahoma, the assessment of costs and fees incurred in this action, and any other appropriate action with respect to Defendant's license to practice as a physician and surgeon in the State of Oklahoma.

Dated this  $2\mathcal{C}$  day of August, 2005 at 1233 p.m.

Respectfully submitted,

Elizabeth A. Scott, OBA #12470 Assistant Attorney General State of Oklahoma 5104 N. Francis, Suite C Oklahoma City, OK 73118

Attorney for the State of Oklahoma ex rel. Oklahoma State Board of Medical Licensure and Supervision