

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

STATE OF OKLAHOMA,
Plaintiff,)
-vs-)
JOE GREER SAVAGE, M.D.,)
Defendant.

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STATE BOARD
MEDICAL EXAMINERS

COMPLAINT

Comes now Carole A. Smith, inspector for the State Board of Medical Examiners, State of Oklahoma, being first duly sworn upon oath and states:

1. That Joe Greer Savage, M.D., holding Oklahoma Medical License No. 9266, is charged with unprofessional conduct, to wit: violation of the Oklahoma Medical Practice Act, 59 O.S. Supp. 1977, §509, more specifically subsection 5, as follows:

"Habitual intemperance or the habitual use of habit-forming drugs."

2. That Joe Greer Savage, M.D., is charged with unprofessional conduct in that Dr. Savage has violated Rule 29, subsections (a), (b) and (c) of the Rules and Regulations of the Board of Medical Examiners, to wit:

"(29) The Board has the right to refuse or revoke a license or certificate for unprofessional conduct.

In addition to the acts defined as 'unprofessional conduct' in 59 O.S. 1971, §509, as amended, the following acts shall be considered as 'unprofessional conduct:'

"(a) Indiscriminate or excessive prescribing of controlled or narcotic drugs;

"(b) Prescribing of controlled or narcotic drugs in excess of the amount considered good medical practice;

"(c) 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 January 1, 1978, to the present date, Joe Greer Savage, M.D., did prescribe, indiscriminately and/or excessively, to a patient, D. B. [REDACTED], certain drugs which are categorized as Schedule II drugs, to

Prescribing of 1,440 dosage units of Sodium Amytal; 260 dosage units of Quaalude, 300 mg.; 520 dosage units of Percodan;
units of Tuinal, 200 mg.

4. That Dr. Savage has been prescribing scheduled drugs for this same patient from 1976 to 1978.

5. That Joe Greer Savage, M.D., is guilty of unprofessional conduct in that he has been habitually using habit-forming drugs, to wit: Codeine, Quaalude, Ritalin, and Tynenol #4

6. That Dr. Savage is a holder of an unrevoked license to practice medicine and surgery in the State of Oklahoma and that, upon proof of the facts herein alleged, the Board should take such action as it deems necessary and as is authorized by law.

Carole A. Smith
COMPLAINANT

Subscribed and sworn to before me this 4th day of December, 1978.

Bobby G. Rogers
NOTARY PUBLIC

My Commission Expires:
Sept. 12, 1980

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