IN AND BEFORE THE STATE BOARD OF MEDICAL EXAMINERS

STATE OF OKLAHOMA

STATE OF OKLAHOMA, ex rel, STATE BOARD OF MEDICAL EXAMINERS,	
Plaintiff,	RECEIVED
VS.	DEC 1 5 1980
PERRY THOMAS TAACA, JR. M.D.) CTATE DOADD
Defendant.	STATE BOARD MEDICAL EXAMINERS

COMPLAINT

COMES NOW CAROLE A. SMITH, Inspector for the State Board of Medical Examiners, Oklahoma City, Oklahoma, being first duly sworn upon oath, and states as follows:

- 1. That Perry Thomas Taaca, Jr., M.D., holding Oklahoma Medical License No. 9474, is charged with unprofessional conduct, to wit: Violation of the Oklahoma Medical Practice Act, Title 59 O.S. Supp., 1980, Section 509, paragraphs 6, 8, 10 and 12, to wit:
 - "6. Conviction of a felony or of any offense involving moral turpitude."
 - "8. Conviction or confession of a crime involving the violation of the antinarcotic or prohibition laws and regulations of the federal government or the Board of Health laws and regulations of the State of Oklahoma."
 - "10. The commission of any act which is a violation of the criminal laws of Oklahoma when such act is connected with the physician's practice of medicine. A complaint, indictment or confession of a criminal violation shall not be necessary for the enforcement of this provision. Proof of the commission of the act while in the practice of medicine or under the guise of the practice of medicine shall be unprofessional conduct."
 - "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 on or about the 3rd day of November, 1980, Perry Thomas Taaca, Jr., M.D., pled guilty to knowingly and intentionally attempting to possess 300 diluadid, a Schedule II controlled dangerous substance which is a narcotic drug.

3. That Dr. Taaca wrote six (6) false and fictitious prescriptions in order to obtain said drugs.

4. That said drugs were obtained for the purpose of exchanging the drugs for merchandise.

5. That said acts are in violation of federal and state criminal laws.

6. That said acts are in violation of the heretofore cited sections of the Oklahoma Medical Practice Act.

7. That Perry Thomas Taaca, Jr., M.D., is the holder of an unrevoked license to practice medicine and surgery in the State of Oklahoma.

WHEREFORE, premises considered, complainant prays that upon proof of the facts herein alleged, the Board take such disciplinary action as is authorized by law.

Carole a. SMITH, INSPECTOR

Subscribed and sworn to before me this 15th day of December, 1980

NOTARY PUBLIC

My Commission Expires:

9-18-1984 (SEAL)