

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

FILED

**STATE OF OKLAHOMA
EX REL. THE OKLAHOMA BOARD
OF MEDICAL LICENSURE
AND SUPERVISION,**

Plaintiff,

v.

JULIE DEANNA WILLIAMS, M.D.,

LICENSE NO. 20262

Defendant.

APR 06 2006

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 06-01-3037

CITATION

YOU ARE HEREBY NOTIFIED that on the 6th day of April, 2006, a sworn Complaint was filed with the undersigned Secretary of the Oklahoma State Board of Medical Licensure and Supervision, State of Oklahoma, charging you with violations of the Oklahoma Allopathic Medical and Surgical Licensure and Supervision Act at 59 Okla. Stat. §509 (8), (12), (13) and (18), and OAC 435:10-7-4 (11), (26), (27) and (39). A copy of the Complaint is attached hereto and made a part thereof.

On May 11-13, 2006, the Board will be in regular session at 9:00 o'clock a.m., at its offices located at 5104 N. Francis, Suite C, Oklahoma City, Oklahoma, at which time your Complaint will be considered by the Board, and a hearing will be held pursuant to the Oklahoma Administrative Procedures Act, 75 Okla. Stat. §309, *et seq.*, as amended.

If the Board decides, after considering all the testimony and evidence, that you are guilty as charged, your license to practice as a physician within the State of Oklahoma may be suspended or revoked or other disciplinary action may be taken by the Board as authorized by law, including the assessment of costs and attorney's fees for this action as provided by law.

Under the laws of the State of Oklahoma, you are required to file your written Answer under oath with the Secretary of the Board within twenty (20) days after the Citation is served upon you. Unless your Answer is so filed, you will be considered in default, and the Board may accept the allegations set forth in the complaint as true at the hearing of the complaint. If the charges are deemed sufficient by the Board, your license to practice as a physician in the State of Oklahoma may be suspended or revoked.

THEREFORE, you are cited to appear at the hearing. If you are not present in person, you may be present through your attorney.

DATED this 6th day of April, 2006 at 11:30 am o'clock.

A handwritten signature in dark ink, appearing to read "Gerald C. Zumwalt", written over a horizontal line.

GERALD C. ZUMWALT, M.D., Secretary
Oklahoma State Board of Medical
Licensure and Supervision

RETURN OF SERVICE BY AGENT

Received the attached and foregoing Citation, Complaint and Scheduling Order in the

investigation of JULIE DEANNA WILLIAMS, MD, at Oklahoma City, Oklahoma, on the 7TH day of APRIL, 2006, and on the 7th day of April, 2006, at 2:15 o'clock P.M. served it on the within named defendant by delivering a copy to: Amy Jenkins
(name of person served)

at (address):

for Jami Fenner, Atty for Dr Wms
Lester, Loving Law Firm
1701 S Kelly
Edmond, OK

Served by:

Michael Jenkins

Subscribed and sworn to before me on this 7 day of April, 2006.



Janet Swindle
Notary Public

My Commission expires:

8-22-06

CASE NAME: JULIE DEANNA WILLIAMS, MD
CASE #: 06/01/3037

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OKLAHOMA STATE BOARD OF
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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, Julie Deanna Williams, M.D., Oklahoma license no. 20262, 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, Julie Deanna Williams, M.D., holds Oklahoma license no. 20262, and is a psychiatrist practicing in Oklahoma City, Oklahoma.

3. A review of Defendant's records reveals that Defendant began treating her brother, Patient PWK, on or around August 18, 2004 and continuing through at least December 12, 2005. Prescriptions written by Defendant to Patient PWK during this time include thirteen (13) prescriptions for Adderall, a Schedule II controlled dangerous drug, for 690 dosage units, and three (3) prescriptions for Clonazepam, a Schedule IV controlled dangerous drug, for 130 dosage units. A review of Defendant's records reveals that she failed to perform any physical examination on this patient prior to prescribing the controlled dangerous drugs, and that she failed to maintain complete and accurate records of all controlled dangerous drugs prescribed to her brother, Patient PWK.

4. On December 27, 2005, Board investigators contacted numerous pharmacies in the Oklahoma City area to determine what prescriptions had been written by Defendant to Patient PWK. Board investigators contacted Sav-On Pharmacy #2267 and requested a prescription profile for all controlled dangerous substances prescriptions from Defendant to her brother, Patient PWK. Brian Hooper, pharmacist for Sav-On pharmacy, advised Board investigators that approximately one (1) week earlier, a representative from Defendant's office had contacted him and asked that a prescription profile for all controlled dangerous substances from Defendant to Patient PWK be faxed to Defendant's office. Patient PWK also contacted the pharmacy on that same date and inquired as to when the prescriptions from Defendant to him began.

5. Board investigators subsequently subpoenaed and received a copy of the chart Defendant had prepared for Patient PWK. Defendant admits that Patient PWK's chart was kept in a place separate from other charts at her practice and that she treated him either at her office or at his house. Patient PWK's chart contains numerous inaccuracies, including two (2) instances where prescriptions were noted to have been given, but the prescriptions were filled days before the alleged office visits. The chart is missing alleged offices visits, contains undated or misdated offices visits, and references an office visit which could not have occurred yet since it was in the future. Additionally, nine (9) of the sixteen (16) prescriptions for controlled dangerous drugs are not noted in the chart in any way.

6. Defendant additionally wrote, administered or authorized prescriptions for non-controlled dangerous drugs to Patient PWK, including Lexapro, Respa-PE and Fluticasone. Defendant failed to perform any physical examination on Patient PWK prior to prescribing these dangerous drugs to him, she did not establish a legitimate medical need for the medications, and she did not establish a valid physician patient relationship prior to prescribing the medications. Defendant's chart contains no reference to any of these prescriptions to Patient PWK.

7. Defendant is guilty of unprofessional conduct in that she:

- A. Engaged in dishonorable or immoral conduct which is likely to deceive, defraud or harm the public in violation of 59 O.S. § 509 (8) and OAC 435:10-7-4 (11).
- B. Prescribed or administered a drug or treatment without sufficient examination and the establishment of a valid physician patient relationship in violation of 59 O.S. § 509 (12).
- C. Failed to maintain an office record for each patient which accurately reflects the evaluation, treatment, and medical necessity of treatment of the patient in violation of 59 O.S. § 509 (18).
- D. Prescribed, sold, administered, distributed, ordered, or gave any drug legally classified as a controlled substance or

recognized as an addictive dangerous drug to a family member or to himself or herself in violation of OAC 435:10-7-4(26).

- E. Violated any provision of the medical practice act or the rules and regulations of the Board or of an action, stipulation, or agreement of the Board in violation of 59 O.S. §509 (13) and OAC 435:10-7-4(39).
- F. Violated any state or federal law or regulation relating to controlled substances in violation of OAC 435:10-7-4(27).

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 6th day of April, 2006 at 11:00 a. .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

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JUL 20 2006

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 06-01-3037

FINAL ORDER OF SUSPENSION

This cause came on for hearing before the Oklahoma State Board of Medical Licensure and Supervision (the "Board") on July 20, 2006, at the office of the Board, 5104 N. Francis, Suite C, Oklahoma City, Oklahoma, pursuant to notice given as required by law and the rules of the Board.

Elizabeth A. Scott, Assistant Attorney General, appeared for the plaintiff and defendant appeared in person and through counsel, William R. Cathey.

The Board *en banc* after hearing arguments of counsel, reviewing the exhibits admitted and the sworn testimony of witnesses, and being fully advised in the premises, found that there is clear and convincing evidence to support the following Findings of Fact, Conclusions of Law and Orders:

Findings of Fact

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. The Board has jurisdiction over this matter, and notice has been given in all respects in accordance with law and the rules of the Board.
3. Defendant, Julie Deanna Williams, M.D., holds Oklahoma license no. 20262, and is a psychiatrist practicing in Oklahoma City, Oklahoma.

4. A review of Defendant's records reveals that Defendant began treating her brother, Patient PWK, on or around August 18, 2004 and continuing through at least December 12, 2005. Prescriptions written by Defendant to Patient PWK during this time include thirteen (13) prescriptions for Adderall, a Schedule II controlled dangerous drug, for 690 dosage units, and three (3) prescriptions for Clonazepam, a Schedule IV controlled dangerous drug, for 130 dosage units. A review of Defendant's records reveals that she failed to perform a complete physical examination on this patient prior to prescribing the controlled dangerous drugs, and that she failed to maintain complete and accurate records of all controlled dangerous drugs prescribed to her brother, Patient PWK.

5. On December 27, 2005, Board investigators contacted numerous pharmacies in the Oklahoma City area to determine what prescriptions had been written by Defendant to Patient PWK. Board investigators contacted Sav-On Pharmacy #2267 and requested a prescription profile for all controlled dangerous substances prescriptions from Defendant to her brother, Patient PWK. Brian Hooper, pharmacist for Sav-On pharmacy, advised Board investigators that approximately one (1) week earlier, a representative from Defendant's office had contacted him and asked that a prescription profile for all controlled dangerous substances from Defendant to Patient PWK be faxed to Defendant's office. Patient PWK also contacted the pharmacy on that same date and inquired as to when the prescriptions from Defendant to him began.

6. Board investigators subsequently subpoenaed and received a copy of the chart Defendant had prepared for Patient PWK. Defendant admits that Patient PWK's chart was kept in a place separate from other charts at her practice and that she treated him either at her office or at his house. Patient PWK's chart contains numerous inaccuracies, including two (2) instances where prescriptions were noted to have been given, but the prescriptions were filled days before the alleged office visits. The chart is missing alleged office visits, contains undated or misdated office visits, and references an office visit which could not have occurred yet since it was in the future. Additionally, nine (9) of the sixteen (16) prescriptions for controlled dangerous drugs are not noted in the chart in any way.

7. Defendant is guilty of unprofessional conduct in that she:

- A. Prescribed, sold, administered, distributed, ordered, or gave any drug legally classified as a controlled substance or recognized as an addictive dangerous drug to a family member or to himself or herself in violation of OAC 435:10-7-4(26).
- B. Violated any provision of the medical practice act or the rules and regulations of the Board or of an action, stipulation, or agreement of the Board in violation of 59 O.S. §509 (13) and OAC 435:10-7-4(39).

- C. Violated any state or federal law or regulation relating to controlled substances in violation of OAC 435:10-7-4(27).

Conclusions of Law

1. The Board has jurisdiction and authority over the Defendant and subject matter herein pursuant to the Oklahoma Allopathic Medical and Surgical Licensure and Supervision Act (the "Act") and its applicable regulations. The Board is authorized to enforce the Act as necessary to protect the public health, safety and welfare.

2. Defendant is guilty of unprofessional conduct in that she:

- A. Prescribed, sold, administered, distributed, ordered, or gave any drug legally classified as a controlled substance or recognized as an addictive dangerous drug to a family member or to himself or herself in violation of OAC 435:10-7-4(26).
- B. Violated any provision of the medical practice act or the rules and regulations of the Board or of an action, stipulation, or agreement of the Board in violation of 59 O.S. §509 (13) and OAC 435:10-7-4(39).
- C. Violated any state or federal law or regulation relating to controlled substances in violation of OAC 435:10-7-4(27).

3. The Board further found that the Defendant's license should be suspended based upon any or all of the violations of the unprofessional conduct provisions of 59 O.S. §509 (13) and OAC 435: 10-7-4 (26), (27) and (39).

Order

IT IS THEREFORE ORDERED by the Oklahoma State Board of Medical Licensure and Supervision as follows:

1. The license of Defendant, Julie Deanna Williams, M.D., Oklahoma license no. 20262 is hereby **SUSPENDED** as of the date of this hearing, July 20, 2006 for **ONE (1) MONTH**.

2. Defendant shall pay an **ADMINISTRATIVE FINE** in the amount of \$7,500.00 to be paid on or before August 20, 2006.

3. Within one (1) year of the date of this Order, Defendant shall obtain **CONTINUING MEDICAL EDUCATION** approved in advance by the Board Secretary for a minimum of ten (10) hours on prescribing controlled dangerous substances. Defendant shall provide to the Board Secretary proof of completion of the continuing medical education.

4. Within one (1) year of the date of this Order, Defendant shall obtain **CONTINUING MEDICAL EDUCATION** approved in advance by the Board Secretary for a minimum of ten (10) hours on boundary issues. Defendant shall provide to the Board Secretary proof of completion of the continuing medical education.

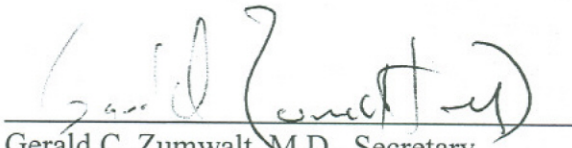
5. Defendant is hereby **FORMALLY REPRIMANDED**.

6. Upon reinstatement of Defendant's license, for one (1) year, Defendant will keep triplicate, serially numbered prescriptions of all controlled dangerous substances readily retrievable, in numerical order, and will furnish copies to investigators or other authorized agents of the Board immediately upon request.

7. Promptly upon receipt of an invoice, Defendant shall pay all costs of this action authorized by law, including without limitation, legal fees and costs, investigation costs, staff time, salary and travel expenses, witness fees and attorney's fees.

8. Defendant's suspension will be lifted, and her license will be reinstated only upon payment in full of all costs and expenses incurred by the State of Oklahoma prior to July 22, 2006.


Dated this 21 day of July, 2006.



Gerald C. Zumwalt, M.D., Secretary
Oklahoma State Board of
Medical Licensure and Supervision

CERTIFICATE OF SERVICE

I certify that on the 21 day of July, 2006, I mailed, via first class mail, postage prepaid, a true and correct copy of this Order to William R. Cathey, 5104 N. Francis, Suite H, Oklahoma City, OK 73118 and Julie Deanna Williams, 18001 Pawtucket Lane, Edmond, OK 73003.



Janet Swindle