

TRUE COPY
Investigation Division
Bureau of Health Services
Dept. of Licensing & Regulation

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATION
BOARD OF MEDICINE

In the Matter of
ROBERT L. ALEXANDER, M.D.
_____ /

ADMINISTRATIVE COMPLAINT

NOW COME the People of the State of Michigan, by Frank J. Kelley, Attorney General for the State of Michigan, by Assistant Attorney General Mark E. Donnelly, and hereby file the within complaint against Robert L. Alexander, hereafter Respondent, alleging upon information and belief as follows:

1. The Board of Medicine, hereafter Board, an administrative agency established by the Public Health Code, 1978 PA 368, as amended; MCL 333.1101 et seq; MSA 14.15(1101) et seq, is empowered to discipline licensees thereunder.
2. Respondent is currently licensed to practice medicine pursuant to the Public Health Code, supra.
3. On or about September 22, 1988, in the United States District Court for the Eastern District of Michigan,

Southern Division, Respondent was found guilty, upon a jury verdict, of conspiracy to possess with intent to distribute and to distribute controlled substances, contrary to 21 USC 841(a)(1) and Counts Seven through Seventeen of an indictment, a copy of which is attached hereto and made a part hereof as if set forth in full.

COUNT I

Respondent's conduct and conviction, as set forth in paragraph 3 above, constitutes a violation of general duty, consisting of negligence or failure to exercise due care, including negligent delegation to or supervision of employees or other individuals, whether or not injury results, contrary to section 16221(1)(a) of the Public Health Code, supra.

COUNT II

Respondent's conduct and conviction, as set forth in paragraph 3 above, constitutes a conduct, practice, or condition which impairs, or may impair, the ability to safely and skillfully practice the health profession, in violation of section 16221(1)(a) of the Public Health Code, supra.

COUNT III

Respondent's conduct and conviction, as set forth in paragraph 3 above, constitutes a departure from, or failure to conform to, minimal standards of acceptable and prevailing practice for the health profession, in violation of section 16221(1)(b)(i) of the Public Health Code, supra.

COUNT IV

Respondent's conduct and conviction, as set forth in paragraph 3 above, constitutes conviction of a crime reasonably related to and adversely affecting Respondent's ability to practice in a safe and competent manner, in violation of section 16221(1)(b) (v) of the Public Health Code, supra.

COUNT V

Respondent's conduct and conviction, as set forth in paragraph 3 above, evidences lack of good moral character, in violation of section 16221(1)(b)(vi) of the Public Health Code, supra.

COUNT VI

Respondent's conduct and conviction, as set forth in paragraph 3 above, constitutes practice outside the scope of a license, in violation of section 16221(1)(c)(iii) of the Public Health Code, supra.

COUNT VII

Respondent's conduct and conviction, as set forth in paragraph 3 above, constitutes obtaining, possessing, or attempting to obtain or possess a controlled substance or a drug without lawful authority, in violation of section 16221(1)(c)(iv) of the Public Health Code, supra.

COUNT VIII

Respondent's conduct and conviction, as set forth in paragraph 3 above, constitutes selling, prescribing, giving away, or administering drugs for other than lawful diagnostic or therapeutic purposes, in violation of section 16221(1)(c)(iv) of the Public Health Code, supra.

WHEREFORE, the People request that the within complaint be served upon Respondent and that Respondent be

offered an opportunity to show compliance with all lawful requirements for retention of the license. If compliance is not shown, the People further request that formal proceedings be commenced pursuant to the Public Health Code, supra, rules promulgated pursuant thereto, and the Administrative Procedures Act of 1969, 1969 PA 306, as amended; MCL 24.201 et seq; MSA 3.560(101) et seq.

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