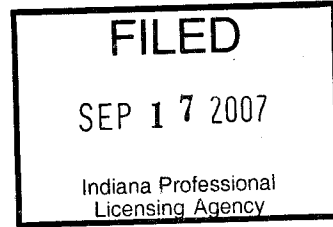


BEFORE THE MEDICAL LICENSING
BOARD OF INDIANA
CAUSE NO. 2007 MLB 0026

IN THE MATTER OF THE LICENSE OF:)
)
JOHN JACOB GREENMAN, M.D.)
LICENSE NUMBER: 01034958A,)
01034958B)
MLB 9/18/07 MLR 9/18/07)
Respondent.)



COMPLAINT

This complaint is brought against the Medical license of John Jacob Greenman, M.D., (“Respondent”) by the State of Indiana, by counsel, Deputy Attorney General, Heather Kennedy, on behalf of the Office of the Attorney General (“Petitioner”) and pursuant to Indiana Code § 25-1-7-7 et seq., Ind. Code § 25-1-5-3, Ind. Code § 25-22.5 et. seq., the Administrative Orders and Procedures Act, Ind. Code § 4-21.5-3 et seq. and Ind. Code § 25-1-9-1 et seq. and in support alleges and states:

FACTS

1. Respondent’s address on file with the Indiana Professional Licensing Agency is Caylor Nickel Clinic/Jane Thompson, One Caylor Nickel Square, Bluffton, IN, 46714 and he is a duly licensed medical doctor in the State of Indiana having been issued license number 01034958.

2. On May 10, 2004, Patient 1 was convicted in a jury trial of Operating a Vehicle after a Lifetime Suspension, a Class C Felony. The Wabash Circuit Court sentenced Patient 1 to four years in the Indiana Department of Correction with two years suspended. Upon release from incarceration, Patient 1 was placed on formal probation

for a period of two years with one of the terms of his probation being that he was not to use alcoholic beverages of any kind.

3. On May 23, 2006, the Wabash County Probation Department conducted a compliance check for Patient 1 and it was discovered that Patient 1 possessed and admitted to consuming alcohol on that date.

4. On May 26, 2006, the Wabash County Prosecutor filed a petition to revoke Patient 1's criminal probation alleging that he violated the terms of his probation by consuming alcohol.

5. On May 26, 2006, Dr. Greenman prepared a letter to Probation Officer Katherine Halverson, stating that "even though Patient 1 was an alcoholic, he (Respondent) would request the Court to allow him (Patient 1) to have two, but only two beers a day for his urinary symptoms."

6. In his response to the consumer complaint, Dr. Greenman indicated that on August 25, 2006, he was aware that Patient 1 was an alcoholic and that Patient 1 was refusing to take medication to control his diabetes. Despite this knowledge, Dr. Greenman issued Patient 1 a "prescription" for beer.

7. On August 28, 2006, the Prosecutor filed a subsequent petition to revoke Patient 1's criminal probation alleging that while on home detention Patient 1 violated the terms of probation by again consuming alcohol on August 22, 2006.

COUNT I

Respondent's conduct is in violation of Indiana Code § 25-1-9-4(a)(4)(B) failure to keep abreast of current theory or practice to wit: 844 IAC 5-2-3, "A practitioner shall exercise reasonable care and diligence in the treatment of patients based upon generally

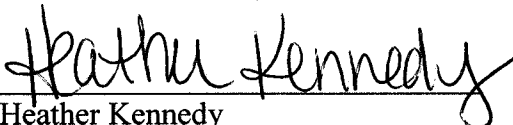
accepted scientific principles, methods, treatments, and current professional theory and practice,” as evidenced by the Respondent’s decision to prescribe an alcoholic up to five beers a day, with knowledge that the patient was an alcoholic as well as noncompliant with medications that treated diabetes and other medical conditions.

WHEREFORE, Petitioner demands an order against the Respondent, that:

1. Imposes the appropriate disciplinary sanction;
2. Directs Respondent to immediately pay all the cost incurred in the prosecution of this case;
3. Provides any other relief the Board deems just and proper.

Respectfully submitted,

STEVE CARTER
Attorney General of Indiana

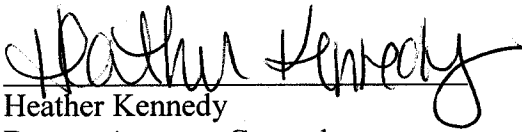
By: 
Heather Kennedy
Deputy Attorney General
Attorney Number: 26317-49A

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing "Complaint" has been served upon the Respondent listed below, by United States mail, first class postage prepaid, on this 17th day of September, 2007.

John Jacob Greenman
Caylor Nickel Clinic/Jane Thompson
One Caylor Nickel Square
Bluffton, IN 46714

Miller Murphy, LLP
Milford Miller
110 W. Berry St. Suite 1500
Fort Wayne, IN 46802


Heather Kennedy
Deputy Attorney General

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