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COMMONWEALTH OF KENTUCKY
BOARD OF MEDICAL LICENSURE
CASE NO. 2034

IN RE: THE LICENSE TO PRACTICE MEDICINE IN THE COMMONWEALTH OF KENTUCKY HELD BY MICHAEL E. FLETCHER, M.D., LICENSE NO. 31154, 210 THOMAS MORE PARKWAY, CRESTVIEW HILLS, KENTUCKY 41017

AMENDED COMPLAINT

Comes now the Complainant Waqar A. Saleem, M.D., Chair of the Kentucky Board of Medical Licensure's Inquiry Panel A, and on behalf of Inquiry Panel A, states for its Amended Complaint against the licensee, Michael E. Fletcher, M.D., as follows:

1. At all relevant times, Michael E. Fletcher, M.D. ("the licensee"), was licensed by the Board to practice medicine in the Commonwealth of Kentucky.
2. The licensee's medical specialty is interventional pain management.
3. On or about November 18, 2021, in the United States District Court, Eastern District of Kentucky, Northern Division, the licensee was indicted on felony charges related to controlled substances.
4. Specifically, the licensee was indicted on three (3) counts of knowingly and intentionally distributing and dispensing controlled substances pursuant to prescriptions that were not issued for a legitimate medical purpose by an individual practitioner acting in the usual course of his professional practice, in violation of Title 21, United States Code, Section 841(a)(1), as set forth below:

Count	Approximate Date Prescription Written	Substances Distributed To	Substance Name	Quantity
1	June 6, 2016	CH	Oxycodone Hydrochloride	20
2	June 30, 2016	CH	Oxycodone Hydrochloride	20

3	August 8, 2016	SK	Oxycodone Hydrochloride	84
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5. On or about November 23, 2021, the Chair of the Board's Inquiry Panel A determined that the licensee's practice placed his patients and the public at risk and in danger. As a result, the licensee was restricted from utilizing controlled substances in the practice of medicine in the Commonwealth of Kentucky pending resolution of the Complaint.
6. On or about August 4, 2022, a superseding indictment was issued against the licensee, adding an additional count for conspiracy to distribute controlled substances to patients in violation of Title 21, United States Code, Section 846.
7. On or about July 19, 2024, after a bench trial for the licensee's federal criminal charges related to prescribing controlled substances, he was acquitted of conspiracy but found guilty on three counts of knowingly and intentionally distributing and dispensing controlled substances pursuant to prescriptions that were not issued for a legitimate medical purpose by an individual practitioner acting in the usual course of his professional practice.
8. By his conduct, the licensee has violated the provisions of KRS 311.595(4), KRS 311.595(9), as illustrated by KRS 311.597(4), and KRS 311.595(12). Accordingly, legal grounds exist for disciplinary action against his Kentucky medical license.
9. The licensee is directed to respond to the allegations delineated in paragraphs 6 and 7 of the Amended Complaint within thirty (30) days of service thereof and is further given notice that:
 - (a) His failure to respond may be taken as an admission of the charges;
 - (b) He may appear alone or with counsel, may cross-examine all prosecution witnesses and offer evidence in his defense.

10. NOTICE IS HEREBY GIVEN that a hearing on this Amended Complaint is scheduled for **February 6, 2025 at 9:00 a.m.**, Eastern Standard Time, at the Kentucky Board of Medical Licensure, Hurstbourne Office Park, 310 Whittington Parkway, Suite 1B, Louisville, Kentucky 40222. Said hearing shall be held pursuant to the Rules and Regulations of the Kentucky Board of Medical Licensure and pursuant to KRS Chapter 13B. This hearing shall proceed as scheduled and the hearing date shall only be modified by leave of the Hearing Officer upon a showing of good cause.

WHEREFORE, Complainant prays that appropriate disciplinary action be taken against the license to practice medicine held by MICHAEL E. FLETCHER, M.D.


This 10th day of October, 2024.



WAQAR A. SALEEM, M.D.
CHAIR, INQUIRY PANEL A

CERTIFICATE OF SERVICE

I certify that the original of this Amended Complaint was delivered to Mr. Michael S. Rodman, Executive Director, Kentucky Board of Medical Licensure, 310 Whittington Parkway, Suite 1B, Louisville, Kentucky 40222; a copy was mailed to Thomas J. Hellmann, Esq., Hearing Officer, 810 Hickman Hill Road, Frankfort, Kentucky 40601; and a copy was mailed via certified mail return-receipt requested to the licensee, Michael E. Fletcher, M.D., License No. 31154, PO Box 35157, Tulsa, Oklahoma 74135, on this on this 10th day of October, 2024.



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