

4. Beginning on or about August 25, 2004, the Department received information that from on or about October 18, 2002, through on or about October 7, 2004, Respondent prescribed the following controlled substances to M.P.:

a. Aprazolam .25	quantity 50
b. Clonazepam .5 mg	quantity 190
c. Demerol 100mg/ml	quantity 220
d. Demerol 50mg/ml	quantity 20
e. Diazepam 5mg	quantity 30
f. Dilaudid 2mg/ml	quantity 422
g. Duragesic Patch 100mcg/hr	quantity 4
h. Duragesic Patch 50 mcg/hr	quantity 6
i. Hydrocodone/APAP 5/325	quantity 140
j. Hydrocodone/APAP 10/325	quantity 205
k. Hydrocodone/APAP 10-650	quantity 10
l. Hydrocodone/APAP 5/500	quantity 515
m. Hydrocodone/APAP 7.5/750	quantity 135
n. Hydromorphone 2 mg/ml	quantity 60
o. Hydromorphone 4 mg	quantity 70
p. Meperidine 100 mg/ml	quantity 20
q. Methadone 10 mg	quantity 330
r. Methadone HCL 10 mg	quantity 360
s. Methadose 10 mg	quantity 100
t. Morphine Sulfate 15mg/ml	quantity 100
u. Morphine Sulfate ER 15	quantity 30
v. Morphine Sulfate 30 mg	quantity 30
w. Morphine Sulfate SI 10	quantity 12
x. Norco 10/325	quantity 15
y. Oxycodone 5 mg	quantity 280
z. Oxycotin 10	quantity 15
aa. Oxycotin 40 mg	quantity 20

bb. Oxycotin 80 mg	quantity 20
cc. Temazepam 30 mg	quantity 30

5. Respondent prescribed and/or administered controlled substances and narcotics for other than medically accepted therapeutic purposes.
6. Respondent engaged in dishonorable, unethical or unprofessional conduct of a character likely to cause harm to the public.
7. The foregoing acts and / or omissions are grounds for revocation or suspension of a Certificate of Registration pursuant to 225 Illinois Compiled Statutes (2002), Section 60/22 (A), paragraph (5), relying upon the Rules for the Administration of the Medical Practice Act, Illinois Administrative Code, Title 68, Section 1285.240 (a)(1)(B)(E) and (F), and 225 Illinois Compiled Statutes (2002), Section 60/22 (A), paragraphs (17) and (33).

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION, DIVISION OF PROFESSIONAL REGULATION, of the State of Illinois, by Sadzi M. Oliva, its Chief of Medical Prosecutions, prays that the Physician and Surgeon License and Controlled Substance License of Bruce Elliott Greenfield, M.D., by suspended, revoked, or otherwise disciplined.

COUNT II

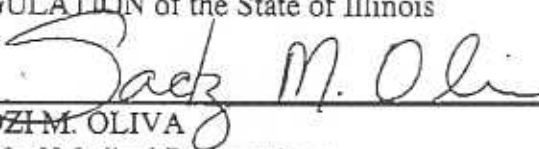
- 1-6. The Department hereby realleges paragraphs 1 through 6 of Count I as paragraphs 1 through 6 of Count II of this Complaint.
7. At all times relevant to this Complaint, Respondent participated in a personal and sexual relationship with M.P. while M.P. was a patient under Respondent's care.
8. On or about February 15, 2005, Respondent, upon leaving M.P.'s residence, Respondent confronted and threatened M.P.'s father.

9. The foregoing acts and/or omissions are grounds for revocation or suspension of a Certificate of Registration pursuant to 225 Illinois Compiled Statutes (2002), Section 60/22(A), paragraph (5) relying upon the Rules for the Administration of the Medical Practice Act, Illinois Administrative Code, Title 68, Section 1285.240 (a)(1)(F), and 225 Illinois Compiled Statutes (2002), Section 60/22 (A), paragraph (20) relying upon the Rules for the Administration of the Medical Practice Act, Illinois Administrative Code, Title 68, Section 1285.240 (b)(1).

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION, DIVISION OF PROFESSIONAL REGULATION, of the State of Illinois, by Sadzi M. Oliva, its Chief of Medical Prosecutions, prays that the Physician and Surgeon License and Controlled Substance License of Bruce Elliott Greenfield, M.D., be suspended, revoked, or otherwise disciplined.

DEPARTMENT OF FINANCIAL AND PROFESSIONAL
REGULATION of the State of Illinois

By:



SADZI M. OLIVA
Chief of Medical Prosecutions

Anthony M. DeVito
Staff Attorney
Department of Financial and Professional Regulation
Division of Professional Regulation
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Petitioner further alleges that the public interest, safety and welfare imperatively require emergency action, in that the Respondent's continued practice of medicine constitutes an immediate danger to the public.

WHEREFORE, Petitioner prays that the license of Respondent be Temporarily Suspended pending proceedings before the Medical Disciplinary Board of the State of Illinois.

DEPARTMENT OF FINANCIAL AND
PROFESSIONAL REGULATION, DIVISION OF
PROFESSIONAL REGULATION, of the State of Illinois

BY: 
SADZI OLIVA
CHIEF OF MEDICAL PROSECUTIONS

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