

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

JUN - 2 2005

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

Plaintiff)

v.)

JONATHAN DRAKE CHANCELLOR, M.D.,)
LICENSE NO. 11284,)

Defendant.)

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 05-05-2962

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, Jonathan Drake Chancellor, M.D., Oklahoma license no. 11284, 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, Jonathan Drake Chancellor, M.D., holds Oklahoma license no. 11284.

3. On February 24, 2005, Defendant approached an undercover Tulsa police officer at Turkey Mountain Park, a public park in the City of Tulsa. Defendant told the undercover officer that he liked to have oral sex but practiced safe sex. He then reached over and grabbed the officer's penis, at which time he was arrested. At the time of this incident, several other people were in the park.

4. On or about March 16, 2005, Defendant was charged with the crime of OUTRAGING PUBLIC DECENCY, a misdemeanor, in violation of 21 O.S. §0022, in the District Court of Tulsa County, State of Oklahoma.

5. On or about May 9, 2005, Defendant submitted his Application for Renewal of Oklahoma license. On his application, Defendant was asked the following question:

"Since the last renewal or initial licensure (whichever is most recent), have you been arrested for, charged with, or convicted of a felony or misdemeanor other than a traffic violation?"

In response to this question, Defendant answered "No."

6. Title 59 O.S. §508 provides as follows:

"Whenever any license has been procured or obtained by fraud or misrepresentation...it shall be the duty of the State Board of Medical Licensure and Supervision to take appropriate disciplinary action in the same manner as is provided... for the disciplining of unprofessional conduct."

Section 508 further provides as follows:

"Use of fraudulent information to obtain a license shall be a misdemeanor offense, punishable, upon conviction, by the imposition of a fine of not less than One Thousand Dollars (\$1,000.00), or by imprisonment in the State Penitentiary for not more than one (1) year, or by both such fine and imprisonment."

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

- 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. Engaged in fraud or misrepresentation in applying for or procuring a medical license or in connection with applying for or procuring periodic reregistration of a medical license in violation of OAC 435:10-7-4 (8).
- C. Engaged in the use of any false, fraudulent, or deceptive statement in any document connected with the practice of medicine and surgery in violation of OAC 435:10-7-4 (19).


- D. Committed any act of sexual abuse, misconduct, or exploitation related or unrelated to the licensee's practice of medicine and surgery in violation of OAC 435:10-7-4 (23).

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 2nd day of June, 2005 at 8:30 a.m.

Respectfully submitted,


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Oklahoma State Board of Medical
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