

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

FILED

JUL 20 2005

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

Plaintiff,

v.

**JOHN ANTHONY FERRIS, M.D.,
LICENSE NO. 12696,**

Defendant.

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 05-07-2972

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, John Anthony Ferris, M.D., 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, John Anthony Ferris, M.D., holds Oklahoma license no. 12696 pursuant to an Agreement for Licensure entered April 10, 2003.

3. On or about June 18, 2003, a Final Decision and Order was issued by the Medical Examining Board for the State of Wisconsin whereby Defendant's license was **SUSPENDED** for a minimum of five (5) years, with the suspension stayed for a period of three (3) months. Defendant was allowed to apply for consecutive three (3) month extensions of the stay of suspension based upon demonstration of compliance with the conditions and limitations imposed by the Wisconsin Board.

4. Defendant's suspension was stayed several times until August 23, 2004 when the Wisconsin Board entered an Order Denying Three Month Stay based upon the fact that Defendant had missed scheduled drug screens and had not timely obtained the required mental health evaluations. The suspension of Defendant's Wisconsin license went into effect on August 28, 2004.

5. On or about December 15, 2004, Defendant appeared before the Wisconsin Medical Board and requested reinstatement of the three month stay of the suspension of his license. By order dated December 17, 2004, the Wisconsin Medical Board denied Defendant's request for reinstatement of the stay of his suspension.

6. On or about June 15, 2005, Defendant appeared before the Wisconsin Medical Board and requested that his Wisconsin license be reinstated. The Wisconsin Board granted his request on the condition that Defendant practice in the State of Oklahoma, along with certain additional conditions.

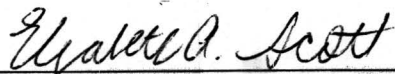
7. Defendant is guilty of unprofessional conduct in that he:

A. Was subject to disciplinary action of another state or jurisdiction against a license or other authorization to practice medicine and surgery based upon acts or conduct by the licensee similar to acts or conduct that would constitute grounds for action as defined in this section in violation of OAC 435:10-7-4(31).

Conclusion

WHEREFORE, the Plaintiff respectfully 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 suspension or revocation and any other appropriate action with respect to Defendant's medical license, and an assessment of costs and attorney's fees incurred in this action as provided by law.

Respectfully submitted,



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