

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

AUG 10 2011

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

Plaintiff,

v.

CHRISTOPHER JOSEPH LADNER, M.D.,  
LICENSE NO. 28421,

Defendant.

OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE & SUPERVISION

Case No. 11-08-4269

**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, Christopher Joseph Ladner, 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, Christopher Joseph Ladner, M.D., holds Oklahoma license no. 28421 and practices teleradiology at the Virtual Radiologic Professionals, LLC in Eden Prairie, Minnesota.

**FRAUDULENT LICENSURE APPLICATION**

3. On or about April 4, 2011, Defendant submitted his initial Application for an Oklahoma Medical License. In response to the question "Have you ever been arrested, charged with, or convicted of a felony or misdemeanor, other than traffic violations?", Defendant answered "NO". Defendant was additionally asked the following question: "Have you been arrested, charged with, or convicted of a traffic violation involving the use of any drug or chemical substance, including alcohol?" In response to this question, Defendant answered "NO".

4. Based upon the answers and information contained on his licensure application, the Board issued Defendant a license to practice medicine and surgery on or about June 8, 2011.

5. On or about June 28, 2011, Board staff received a letter from Defendant wherein Defendant admitted that the information provided on his licensure application may have been "incomplete". Specifically, Defendant admitted that on May 14, 1989, he was arrested in California and charged with possession of a controlled dangerous substance (marijuana) and possession of alcohol (since he was underage at the time). Defendant was arrested and taken to jail where he remained overnight. He made a court appearance, plead no contest and paid a fine.

6. In his June 28, 2011 letter to the Board, Defendant advised that he wished to amend his licensure application to reflect his criminal history which he had not disclosed prior to being granted a license by the Board.

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. Violated any provision of the medical practice act or the rules and regulations of the Board or of an action, stipulation, or agreement of the Board in violation of 59 O.S. §509(13) and OAC 435:10-7-4(39).

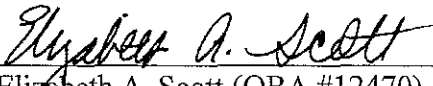
C. Engaged in fraud or misrepresentation in applying for or procuring a medical license or in connection with applying for or procuring periodic reregistration of a medical license in violation of OAC 435:10-7-4(8).

D. 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).

### ***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,

  
Elizabeth A. Scott (OBA #12470)

Assistant Attorney General

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Attorney for the Plaintiff