

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

STATE OF OKLAHOMA, *ex rel.* )  
OKLAHOMA STATE BOARD )  
OF MEDICAL LICENSURE )  
AND SUPERVISION, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
STANLEY KAPLAN, M.D., )  
LICENSE NO. MD 40182, )  
 )  
Defendant. )

**FILED**

MAR 14 2024

OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE & SUPERVISION

Case No. 24-02-6295

**VERIFIED COMPLAINT**

The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision ("Board"), for its Verified Complaint against Stanley Kaplan, M.D. ("Defendant"), alleges and states as follows:

**I. JURISDICTION**

1. The Board has jurisdiction over this subject matter and is a duly authorized agency of the State of Oklahoma empowered to license and oversee the activities of allopathic physicians and surgeons in the State of Oklahoma. 59 O.S. § 480, *et seq.* and Okla. Admin. Code 435:5-1-1, *et seq.*
2. Defendant holds medical license No. 40182, issued 09/27/2022 by the Board. The acts and/or omissions complained of herein were made while Defendant was licensed to practice medicine by the State of Oklahoma.

**II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT**

3. This action arises out of criminal and unprofessional conduct by Defendant as detailed herein.
4. On September 19, 2023, Defendant pled guilty to one count of securities fraud, in violation of 15 U.S.C. § 78j(b), 17 C.F.R. § 240.10b-5, 17 C.F.R. § 240.10b-5-2 and 18 U.S.C. § 2 in the United States District Court for the Southern District of New York, case no. 1:23-cr-00320-GHW-3. Violation of the foregoing provisions of law are punishable by a term of imprisonment of not more than twenty (20) years and therefore classified as Class C felony offenses under federal law. *See* 15 U.S.C. § 78ff(a); 18 U.S.C. § 3559(a)(3). Defendant was subsequently sentenced on January 12, 2024, to a term of imprisonment of five (5)

**FILED**

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OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE & SUPERVISION

STATE OF OKLAHOMA  
OKLAHOMA STATE BOARD  
OF MEDICAL LICENSURE  
& SUPERVISION

Medical

Case No. 24-01-0124

STATE OF OKLAHOMA  
OKLAHOMA STATE BOARD  
OF MEDICAL LICENSURE  
& SUPERVISION

Personnel

MEMORANDUM

The Board of Oklahoma State Board of Medical Licensure and Supervision (Board) is hereby notified that the following information was received from the Oklahoma State Board of Medical Licensure and Supervision (OSBLS) on March 14, 2024:

DISCIPLINE

The Board has received information regarding the disciplinary action taken against a licensee. The licensee, [Name], was found to have violated the rules and regulations of the Board. The Board has determined that the licensee is in violation of the rules and regulations of the Board, and has therefore taken disciplinary action against the licensee. The Board has determined that the licensee is in violation of the rules and regulations of the Board, and has therefore taken disciplinary action against the licensee. The Board has determined that the licensee is in violation of the rules and regulations of the Board, and has therefore taken disciplinary action against the licensee.

II. ALLEGATIONS OF UNLAWFUL CONDUCT

The Board has received information regarding the disciplinary action taken against a licensee. The licensee, [Name], was found to have violated the rules and regulations of the Board. The Board has determined that the licensee is in violation of the rules and regulations of the Board, and has therefore taken disciplinary action against the licensee. The Board has determined that the licensee is in violation of the rules and regulations of the Board, and has therefore taken disciplinary action against the licensee. The Board has determined that the licensee is in violation of the rules and regulations of the Board, and has therefore taken disciplinary action against the licensee.

months followed by three (3) years supervised release, ordered to forfeit \$472,053.61 (proceeds traceable to the offense) and assessed an additional \$100.

5. Defendant, through counsel, subsequently reported his judgement and sentence as described above to the Board, received February 13, 2024.

### III. VIOLATIONS

6. Based on the foregoing, Defendant is guilty of unprofessional conduct as follows:
  - a. Conviction or confession of, or plea of guilty, nolo contendere, no context or Alford plea to a felony or any offense involving moral turpitude, in violation of 59 O.S. § 509(5) and Okla. Admin. Code § 435:10-7-4(10).
  - b. Dishonorable or immoral conduct which is likely to deceive, defraud, or harm the public, in violation of 59 O.S. § 509(8) and Okla. Admin. Code § 435:10-7-4(11).
  - c. The violation, or attempted violation, direct or indirect, of any of the provisions of the Oklahoma Allopathic Medical and Surgical Licensure and Supervision Act, either as a principal, accessory or accomplice, in violation of 59 O.S. § 509(13).
7. Additionally, while the Board is entitled to take disciplinary action at its discretion for the above-described unprofessional conduct, the Board is obligated to revoke Defendant's license to practice medicine for Defendant's felony conviction, pursuant to 59 O.S. § 513(A)(3) and Okla. Admin. Code § 435:5-1-5.2(b).

### V. CONCLUSION

Given the foregoing, the undersigned respectfully requests 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 professional license, including an assessment of costs and attorney's fees incurred in this action as provided by law.

Respectfully submitted,



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Alex A. Pedraza, OBA No. 33584  
Assistant Attorney General  
OKLAHOMA STATE BOARD OF MEDICAL  
LICENSURE AND SUPERVISION  
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VERIFICATION

I, Robbin Roberts, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

1. I have read the above Complaint regarding Stanley Kaplan, MD.; and
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.



Robbin Roberts, Investigator  
OKLAHOMA STATE BOARD OF MEDICAL  
LICENSURE AND SUPERVISION

Date:

3-14-24



County, State of Execution