

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

FILED

JUN - 5 2024

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

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

Case No. 24-02-6295

VOLUNTARY SURRENDER OF LICENSE IN LIEU OF PROSECUTION

State of _____)
) ss:
_____ County)

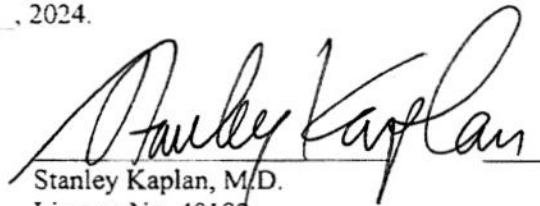
I, Stanley Kaplan, M.D. ("Defendant"), being of lawful age and after first being duly sworn, depose and state as follows:

1. I desire and hereby do voluntarily surrender my Oklahoma allopathic physician license no. 40182. 59 O.S. 509.1(E), *et seq.*
2. The surrender of my license is freely and voluntarily made. I have not been subject to any coercion or duress, and I am fully aware of the consequences of the surrender of my license.
3. I am the subject of an investigation and proceeding by the Oklahoma State Board of Medical Licensure and Supervision ("Board") involving allegations which, if proven in a hearing on the matter, would constitute grounds for disciplinary action by the Board.
4. On September 19, 2023, I 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.
5. The aforementioned violation of law constitutes a criminal felony for which I have been subsequently sentenced.
6. I am guilty of unprofessional conduct by violating the following rules of professional conduct:

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- a. Conviction or confession of, or plea of guilty, nolo contendere, no contest 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).
10. I understand that I am ineligible to apply for reinstatement of my Oklahoma allopathic physician license for a minimum of one (1) year from the date this surrender is accepted by the Board. Any reinstatement will be under terms and conditions as imposed by the Board.
 11. If the Board does not accept this Voluntary Surrender of License in Lieu of Prosecution, the Plaintiff and Defendant (collectively, the "Parties") stipulate that it shall be regarded as null and void. Admissions by Defendant herein, if any, shall not be regarded as evidence against him in a subsequent disciplinary hearing. Defendant will be free to defend himself, and no inferences will be made from his willingness to have this Order accepted by the Board. The Parties stipulate that neither the presentation of the Order nor the Board's consideration of this Order shall be deemed to have unfairly or illegally prejudiced the Board or its individual members and, therefore, shall not be grounds for precluding the Board nor any individual Board member from further participation in proceedings related to the matters set forth herein.

Dated this 04 day of June, 2024.


Stanley Kaplan, M.D.
License No. 40182

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Subscribed and sworn before me this 04 day of June, 2024.



Katherine Stojakovic

Notary Public

My commission expires: 01/23/2027

My commission number: 01ST6446473

ACCEPTED:

Billy H. Stout

Billy H. Stout, M.D., Board Secretary
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Dated this 5th day of JUNE, 2024.

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