

**SEALED****FILED**

JUN 18 2025

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**Heidi D. Campbell, Clerk  
U.S. DISTRICT COURT**UNITED STATES OF AMERICA,****Plaintiff,****v.****LADD CLAYTON ATKINS, D.O.,****Defendant.****FILED UNDER SEAL****Case No. 25 CR 218 - GKE****INFORMATION****[COUNT ONE: 21 U.S.C. §§ 846  
and 843(d)(1) – Conspiracy to****Distribute a Controlled Substance  
Unlawfully as a Registrant;****COUNT TWO: 18 U.S.C. §§ 1349  
and 1347(a) – Conspiracy to Commit  
Health Care Fraud]****THE UNITED STATES ATTORNEY CHARGES:****COUNT ONE****[21 U.S.C. §§ 846 and 843(d)(1)]**

From in or about September 2023 to in or about June 2024, in the Northern District of Oklahoma and elsewhere, **LADD CLAYTON ATKINS, D.O.**, a registrant under Title 21, United States Code, Sections 821 through 830, knowingly, intentionally, and willfully conspired, confederated, and agreed with others known and unknown to the United States Attorney, to distribute Adderall, a Schedule II controlled substance, in the course of his legitimate business and in a manner not pursuant to an order from the person to whom such controlled substance was distributed as required under Title 21, United States Code, Section 828, and Title 21, Code of Federal Regulations, Section 1305, and in violation of Title 21, United States Code, Section 843(a)(2).

All in violation of Title 21, United States Code, Sections 846 and 843(d)(1).

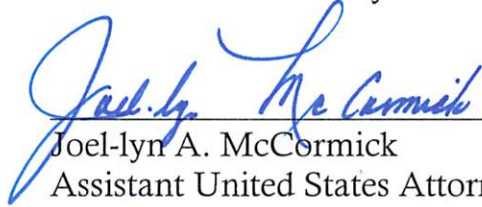
**COUNT TWO**  
**[18 U.S.C. §§ 1349 and 1347(a)]**

From in or about January 2022 to in or about March 2025, in the Northern District of Oklahoma and elsewhere, **LADD CLAYTON ATKINS, D.O.**, and other individuals known to the United States Attorney, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other, to knowingly and willfully execute a scheme and artifice to:

1. Defraud insurers known to the United States Attorney, each of which was a health care benefit program as defined in Title 18, United States Code, Section 24(b), in connection with the delivery of and payment for health care benefits, items, and services, in violation of Title 18, United States Code, Section 1347(a)(1); and
2. Obtain, by means of false and fraudulent pretenses, representations, and promises, the money owned and under the custody and control of insurers known to the United States Attorney, each of which was a health care benefit program as defined in Title 18, United States Code, Section 24(b), in connection with the delivery of and payment for health care benefits, items, and services, in violation of Title 18, United States Code, Section 1347(a)(2).

All in violation of Title 18, United States Code, Sections 1349 and 1347(a).

CLINTON J. JOHNSON  
United States Attorney



Joel-lyn A. McCormick  
Assistant United States Attorney