

# LOUISIANA STATE BOARD OF MEDICAL EXAMINERS

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Department of Investigations  
Telephone: (504) 568-6820  
FAX: (504) 568-6754

**In The Matter Of**

**PRAMELA R. GANJI, M.D.**  
(Certificate No. 11311R),

*Respondent.*

**No. 15-I-486**

**STIPULATION AND AGREEMENT  
FOR VOLUNTARY SURRENDER  
OF MEDICAL LICENSE**

This *Stipulation and Agreement* is made by Pramela R. Ganji, M.D. ("Dr. Ganji"), a physician licensed as of the date hereof to practice medicine in the State of Louisiana, with and in favor of the Louisiana State Board of Medical Examiners (the "Board").

1. *Acknowledgment and Stipulations.* Dr. Ganji hereby acknowledges, stipulates and agrees that:

- (a) An investigation was initiated when the Board received information indicating that Dr. Ganji was indicted by a federal grand jury sitting in the United States District Court for the Eastern District of Louisiana, on one (1) count of Conspiracy to Commit Health Care Fraud and two (2) counts of Health Care Fraud, in violation of Title 18 U.S.C §§1349, both of which counts are felony charges under the laws of the United States.<sup>1</sup>
- (b) Among other matters, the indictment alleged that Dr. Ganji facilitated, submitted and caused the submission of fraudulent claims to Medicare by referring Medicare beneficiaries to a home health agency and certifying they were eligible for home health care services that were not medically necessary and, in some instances, were not rendered. The indictment also alleged that Respondent was the referring physician for approximately \$5,748,381 in claims to the home health care provider.
- (c) In March 2016, following a trial by jury in the United States District Court for the Eastern District of Louisiana, Respondent was convicted of two (2) of the three counts

<sup>1</sup>Indictment, *United States of America vs. Pramela Ganji, M.D., et al*, CR Action No. 15-155 (June 12, 2015).

of the indictment with which she was charged. She awaits sentencing by the Court.<sup>2</sup>

- (d) Investigation of the captioned matter was assigned to the Director of Investigations for the Board, whose review and analysis has confirmed that just cause exists for recommending that a formal Administrative Complaint be filed charging Dr. Ganji with violations of the Louisiana Medical Practice Act, La. Rev. Stat. §37:1285A (1), (2) and (11).<sup>3</sup>
- (e) Pursuant to the Louisiana Medical Practice Act, La. Rev. Stat. §§37:1261 *et. seq.*, and the Louisiana Administrative Procedure Act, La. Rev. Stat. §§49:951 *et. seq.*, Dr. Ganji would be entitled, prior to final disciplinary action against her medical license, to have notice of the allegations and charges asserted against her and to administrative adjudication of such charges, pursuant to La. Rev. Stat. §§49:955-958. At such hearing, Dr. Ganji would be entitled to be represented by legal counsel, to have those charges proved against her by evidence, to appear and confront adverse witnesses, to call witnesses and present evidence on her own behalf in defense or in mitigation of the charges made, to a decision thereon by the Board based upon written findings of fact and conclusions of law pursuant to La. Rev. Stat. §§49:955-965 and to any other right to which she may be afforded by the Louisiana Administrative Procedure Act, La. Rev. Stat. §§49:951 *et seq.* or otherwise.

2. *Voluntary Surrender of License.* Notwithstanding her right to notice of formal charges, administrative hearing and a decision thereon, as provided by La. Rev. Stat. §49:951 *et. seq.*, in recognition of the stipulations set forth hereinabove toward final disposition of the investigation now pending in this matter and in lieu of the institution and prosecution of formal administrative proceedings Dr. Ganji, nonetheless, acknowledges the substantial accuracy of the foregoing information and hereby waives her right to notice of charges and formal adjudication and voluntarily surrenders to the Board for cancellation her license to practice medicine in the state of Louisiana, as evidenced by Certificate No. 0201130. By her subscription hereto, Dr. Ganji also hereby authorizes the Director of Investigations to present this Stipulation and Agreement for Voluntary Surrender of Medical License to the Board for its consideration and to fully disclose to and discuss with the Board the nature and results of the investigation, and she waives any objection to such disclosures under La. Rev. Stat. §49:960.

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<sup>2</sup>*Court Minutes, United States of America vs. Pranela Ganji, Cr. Action No. 15-155 (Mar. 17, 2016).*

<sup>3</sup>La. Rev. Stat. §37:1285A provides that the Board may take action against the license of a physician as the result of: (1) '[C]onviction of a crime or entry of a plea of guilty or *nolo contendere* to a criminal charge constituting a felony under the laws of Louisiana or of the United States;' (2) '[C]onviction of a crime or entry of a plea of guilty or *nolo contendere* to any criminal charge arising out of or in connection with the practice of medicine;' and (11) '[M]aking or submitting false, deceptive, or unfounded claims, reports, or opinions to any patient, insurance company or indemnity association, company, individual, or government authority for the purpose of obtaining anything of economic value.'

3. *Effect of Voluntary Surrender of License.* Dr. Ganji acknowledges, stipulates and agrees that the voluntary surrender of her medical license affected hereby in the presence of an administrative investigation shall have, and shall be deemed by the Board to have, the same effect as if the Board had entered an order of revocation upon the conclusion of formal administrative proceedings. Dr. Ganji further acknowledges, stipulates and agrees that as a result of the voluntary surrender of her medical license affected hereby she shall not have any right or entitlement to reinstatement or renewal of her license to practice medicine in this state, nor shall she hereafter be entitled to apply for or otherwise attempt to obtain any original, reinstated or renewed license to practice medicine in the state of Louisiana.

4. *Termination of Proceedings.* By the voluntary surrender of her medical license, and the attendant dismissal of the investigation occasioned hereby, Dr. Ganji, moreover, acknowledges, stipulates and agrees that she hereby waives any right to which she may be entitled pursuant to the Louisiana Administrative Procedure Act, La. Rev. Stat. §49:951 *et. seq.* or to which otherwise may be afforded to her by any law, to contest her agreement to or the force and effect of this document in any court or other forum relating to the stipulations, agreements, acknowledgments and other matters referred to herein.

5. *Advice of Counsel.* Dr. Ganji acknowledges that she has had the opportunity to seek the advice and guidance of legal counsel with respect to this Stipulation and Agreement for Voluntary Surrender of Medical License and that all of the terms, conditions, restrictions and limitations contained herein have been explained to her and/or that she fully understands them.

6. *Public Record.* Dr. Ganji acknowledges, stipulates and agrees that this Stipulation and Agreement for Voluntary Surrender of Medical License shall be, and shall be deemed, to be a **PUBLIC RECORD.**

**STIPULATION  
AND AGREEMENT**

STATE OF LOUISIANA  
PARISH OF JEFFERSON

I, PRAMELA R. GANJI, M.D., hereby acknowledge, stipulate, approve, accept and consent to entry of the above and foregoing Stipulation and Agreement, this 19<sup>th</sup> day of December 2016.

Pramela Ganji  
PRAMELA R. GANJI, M.D.

WITNESSES:

[Signature]  
Signature

[Signature]  
Signature

William Lord  
Printed Name

Robert Lord  
Printed Name

255 Hickory Ave Harahan, LA 70123  
Address

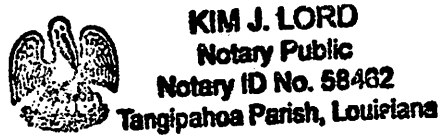
259 Hickory Ave Harahan, LA 70123  
Address

Sworn to and subscribed before me at Harahan, Louisiana, this 19<sup>th</sup> day of December 2016, in the presence of the two stated witnesses.

[Signature and Seal]  
Notary Public (Signature and Seal)

Kim J. Lord  
Printed Name

58462  
Notary or Bar Number (or Stamp)



**ACCEPTANCE**

CONSIDERING THE ABOVE AND FOREGOING, this Stipulation and Agreement for Voluntary Surrender of Medical License is hereby **APPROVED AND ACCEPTED** by the Louisiana State Board of Medical Examiners at New Orleans, Louisiana, on this 9<sup>th</sup> day of JAN. 2017.

**LOUISIANA STATE BOARD  
OF MEDICAL EXAMINERS**

By: 

J. MICHAEL BURDINE, M.D.  
*President*