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

STATE OF OKLAHOMA, ex rel.  OKLAHOMA STATE BOARD	FILED
OF MEDICAL LICENSURE AND SUPERVISION,	DEC 13 2024
Plaintiff,	OKLAHOMA STATE BOARD OF MEDICAL LICENSURE & SUPERVISION
v. )	Case No. 24-08-6392
LAVETRICE JOYCE STEELE, PA., LICENSE NO. PA 2386,	
Defendant. )	

## VERIFIED COMPLAINT

The State of Oklahoma, ex rel. Oklahoma State Board of Medical Licensure and Supervision ("Board"), for its Verified Complaint against Lavetrice Joyce Steele, PA ("Defendant"), alleges and states as follows:

#### I. JURISDICTION

- 1. The Board has jurisdiction over the subject matter and is a duly authorized agency of the State of Oklahoma empowered to license and oversee the activities of its licensees in the State of Oklahoma. 59 O.S. § 480, et seq. and Okla. Admin. Code 435:5-1-1, et seq.
- 2. Defendant holds physician assistant license No. 2386, issued 05/23/2014 by the Oklahoma State Board of Medical Licensure and Supervision. The acts and/or omissions complained of herein occurred while Defendant was licensed to practice as a physician assistant by the State of Oklahoma.

### II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

3. This action arises out of unprofessional conduct by Defendant as detailed herein. The Board originally received information from a state agent regarding an investigation into whether Defendant had written prescriptions for controlled dangerous substances ("CDS") for a family member. Subsequent investigation determined that Defendant wrote two (2) prescriptions for CDS for her sister, and Defendant subsequently admitted to the same. Further, at the time Defendant wrote the two (2) forgoing prescriptions, her Drug Enforcement Agency registration number was expired. Defendant later admitted to the Board investigator that she had written at least one (1) prescription for CDS for her son.

### III. VIOLATIONS

- 4. Based on the foregoing, Defendant is subject to discipline for the commission of prohibited acts, specifically described as follows:
  - a. Acts contrary to Chapter 15, Title 435 of the Oklahoma Administrative Code, the Physician Assistant Act, or other laws or regulations governing the licensed health professional or any stipulation or agreement of the Board, in violation of Okla. Admin. Code § 435:15-5-11(a)(3), to wit:
    - i. Engaging in unprofessional or immoral conduct, Okla. Admin. Code § 435:15-5-11(b)(9).
  - b. Violation of any provision of the Medical Practice Act or the rules promulgated by the Board, in violation of Okla. Admin. Code § 435:15-5-11(a)(4), to wit:
    - i. Prescribing, selling, administering, distributing, ordering, or giving any drug legally classified as a controlled substance or recognized as an addictive dangerous drug to a family member or to himself or herself, Okla. Admin. Code § 435:10-7-4(26).
    - ii. Failure to maintain adequate medical records to support treatment or prescribed medications, Okla. Admin. Code § 435:10-7-4(26).

### 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,

Joseph L. Ashbaker, OBA No. 19395

Assistant Attorney General

OKLAHOMA STATE BOARD OF MEDICAL

LICENSURE AND SUPERVISION

101 N.E. 51st Street

Oklahoma City, Oklahoma 73105

Telephone: 405.437.9462

Email: joe.ashbaker@oag.ok.gov

## **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 Lavetrice Joyce Steele, PA.; 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:

12/12/24

County, State of Execution