

**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,)
)
vs.)
)
ERIC JOSEPH PIPPI, P.A.,)
LICENSE NO. PA 2468,)
)
Defendant.)

FILED

DEC 11 2020

**OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION
Case No. 20-04-5896**

VERIFIED COMPLAINT

The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision ("Board"), alleges and states as follows for its Complaint against Eric Joseph Pippi, P.A. ("Defendant"):

1. The Board is a duly authorized agency of the State of Oklahoma empowered to license and oversee the activities of physician assistants in the State of Oklahoma pursuant to 59 Okla. Stat. §§ 480 et seq. and 519.1 et seq. and Oklahoma Administrative Code ("OAC") 435:1-1-1 et seq.
2. Defendant holds Oklahoma Physician Assistant license number PA 2468, which was issued April 1, 2015.
3. The acts and omissions complained of herein were made while Defendant was acting as a Physician Assistant pursuant to the Physician Assistant license conferred upon him by the State of Oklahoma. Such acts and omissions occurred within the physical territory of the State of Oklahoma.

I. ALLEGATIONS OF PROFESSIONAL MISCONDUCT

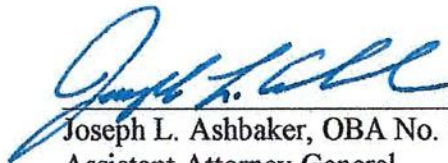
1. Defendant was required to complete twenty (20) hours of continuing education by December 31, 2018. Defendant failed to complete the required twenty (20) hours and, therefore, was then required to complete a total of forty (40) hours of continuing education no later than December 13, 2019.
2. Defendant failed to complete the forty (40) hours by December 31, 2019.

II. VIOLATIONS

4. Based on the foregoing, the Defendant is guilty of professional misconduct as follows:
- a. Licenses issued to the physician assistants shall be renewed annually on a date determined by the State Board of Medical Licensure and Supervision. Each application for renewal shall document that the physician assistant has earned at least twenty (20) hours of continuing medical education during the preceding calendar year in violation of Title 59 § 519.8 (A); and
 - b. Any applicant for renewal who does not meet the requirements for continuing education by December 31 of the previous calendar year may not renew until deficient hours are obtained and verified. Additionally, within the next calendar year the licensee will be required to obtain forty (40) hours of Category 1 CME. Failure to meet those additional requirements will result in further disciplinary action, in violation of Okla. Admin. Code § 435:15-3-17(d).

III. CONCLUSION

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




Joseph L. Ashbaker, OBA No. 19395
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OKLAHOMA STATE BOARD OF MEDICAL
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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 the Defendant, Eric Joseph Pippi, P.A.; 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: 12-10-20



Place of Execution