

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,)
)
v.)
)
STEVEN FREDERICK RICHARDSON,)
LICENSE NO. P.A. 3060,)
)
Defendant.)

FILED

JUL 09 2021

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 21-01-5964

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 **STEVEN FREDERICK RICHARDSON, P.A.** ("Defendant"):

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 Physician Assistants in the State of Oklahoma. **59 O.S. §519.3, et seq.** and **Okla. Admin. Code 435:15-5-11.**
2. In Oklahoma, Defendant holds Oklahoma Physician Assistant (P.A.) license no. 3060. He was granted said license on June 20, 2019.

II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

3. In March of 2020, Defendant was indicted in California for offenses committed in 2016 and 2017. On July 31, 2020, in the Superior Court of the State of California, Orange County, Defendant pled guilty to and was convicted of 2 felonies: (1) one count of Prescribing a Controlled Substance Without a Legitimate Medical Purpose, and (2) one count of Identity Theft. He was sentenced to 180 days in jail, suspended on the condition that he complete 3 years of probation and pay restitution and court costs.

4. Other licensing jurisdictions took action against Defendant's license as follows:
 - a. Idaho: Voluntary surrender on September 1, 2020.
 - b. Virginia: Suspended indefinitely on September 15, 2020.
 - c. Illinois: Voluntary surrender on October 23, 2020.
 - d. Alabama: Voluntary surrender on November 19, 2020.
 - e. New York: Revocation without the right to reapply on December 9, 2020.
 - f. Kentucky: Voluntary surrender on December 17, 2020.
 - g. Wisconsin: Voluntary Surrender on January 20, 2021.
 - h. California: Voluntary Surrender on March 19, 2021.
 - i. Pennsylvania: Indefinite suspension on March 11, 2021.
 - j. Hawaii: Revocation on March 11, 2021.
 - k. DEA: Voluntary Surrender of License on June 3, 2020.

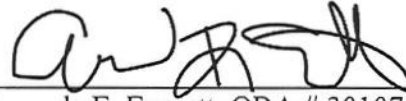
III. VIOLATIONS

5. Based on the foregoing, **STEVEN FREDERICK RICHARDSON, P.A.**, is guilty of unprofessional conduct as follows:
 - a. Convicted of a felony, in violation of Okla. Admin. Code 435:15-5-11(b)(2).
 - b. Fraudulent use of license, in violation of 435:15-5-11(a)(2).
 - c. Engaging in unprofessional conduct, in violation of Okla. Admin. Code 435:15-5-11(b)(9).
 - d. Prescribing or distributing a controlled substance for other than a medically accepted therapeutic purpose, in violation of Okla. Admin. Code 435:15-5-11(b)(10).
 - e. Has been disciplined by another state or jurisdiction based upon acts or conduct similar to acts or conduct that would constitute grounds for disciplinary action as defined in this section, in violation of Okla. Admin. Code 435:15-5-11(b)(12).
 - f. Representing oneself as a physician, in violation of Okla. Admin. Code 435:15-5-11(b)(14).

IV. CONCLUSION

Given the foregoing, the undersigned respectfully request the Board to conduct a hearing, and upon proof of the allegation(s) contained herein, impose an appropriate punishment pursuant to the applicable law and rule on **STEVEN FREDERICK RICHARDSON**, including an assessment of costs and attorneys' fees incurred in this action as provided by law.

Respectfully submitted,



Amanda E. Everett, OBA # 30107
Assistant Attorney General
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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 **STEVEN FREDERICK RICHARDSON, 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

Executed this 8th day of July, 2021, in Oklahoma County, State of Oklahoma.