

**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

SEP 16 2021

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION


Case No. 21-01-5964

VOLUNTARY SURRENDER OF LICENSE IN LIEU OF PROSECUTION

State of Oklahoma)
)
 _____ County) ss:

I, Steven Frederick Richardson, Physician Assistant (“Defendant”), being of lawful age and after first being duly sworn, depose and state as follows:

1. I have received a copy of the Verified Complaint and Citation, filed on July 9, 2021. I agree to waive formal service of the same in this matter for purposes of this SILOP.
2. I hereby voluntarily surrender my Oklahoma Physician Assistant License No. PA 3060, effective September 16, 2021. 59 O.S. 509.1(E), *et seq.*
3. The surrender of my license is freely and voluntarily made. I have not been subject to any coercion or duress, and I am fully aware of the consequences of the surrender of my license.
4. I admit that I am the subject of a proceeding by the Oklahoma State Board of Medical Licensure and Supervision (“Board”) involving allegations which, if proven, would constitute grounds for disciplinary action by the Board.
5. In March of 2020, I 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, I 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. I was sentenced to 180 days in jail, suspended on the condition that I complete 3 years of probation and pay restitution and court costs.

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6. Other licensing jurisdictions have taken action against my licenses as follows:
- Idaho: Voluntary surrender on September 1, 2020.
 - Virginia: Suspended indefinitely on September 15, 2020.
 - Illinois: Voluntary surrender on October 23, 2020.
 - Alabama: Voluntary surrender on November 19, 2020.
 - New York: Revocation without the right to reapply on December 9, 2020.
 - Kentucky: Voluntary surrender on December 17, 2020.
 - Wisconsin: Voluntary Surrender on January 20, 2021.
 - California: Voluntary Surrender on March 19, 2021.
 - Pennsylvania: Indefinite suspension on March 11, 2021.
 - Hawaii: Revocation on March 11, 2021.
 - DEA: Voluntary Surrender of License on June 3, 2020.

7. I am guilty of violating the following rules of professional conduct:

- Felony conviction, in violation of Okla. Admin. Code 435:15-5-11(b)(2).
- Fraudulent use of license, in violation of 435:15-5-11(a)(2).
- Engaging in unprofessional conduct, in violation of Okla. Admin. Code 435:15-5-11(b)(9).
- 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).
- Discipline 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).
- Representing myself as a physician, in violation of Okla. Admin. Code 435:15-5-11(b)(14).

8. I hereby submit my wallet card and wall certificate as evidence of my intent to surrender my license. 59 O.S. § 509.1(E)(2).

9. I hereby agree that I will not reapply for reinstatement of my Oklahoma Physician Assistant license for a minimum of one (1) year from the date this Voluntary Surrender in Lieu of Prosecution (“SILOP”) is accepted by the Board. If I am reinstated, I agree it will be under probation with terms and conditions to be determined by the Board at the time of reinstatement.

10. If the Board does not accept this Voluntary Surrender In Lieu of Prosecution the Plaintiff and Defendant (collectively, the “Parties”) stipulate that it shall be regarded as null and void. Admissions by Defendant herein, if any, shall not be regarded as evidence against Defendant in a subsequent disciplinary hearing. Defendant will be free to defend himself, and no

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inferences will be made from his willingness to have this Order accepted by the Board. The Parties stipulate that neither the presentation of the Order nor the Board's consideration of this Order shall be deemed to have unfairly or illegally prejudiced the Board or its individual members and, therefore, shall not be grounds for precluding the Board nor any individual Board member from further participation in proceedings related to the matters set forth herein.

11. As a condition to accepting my voluntary surrender of license in lieu of prosecution, I acknowledge that the Board will require me to pay all costs expended by the Board for any legal fees and cost, any investigation, probation and monitoring fees, including but not limited to staff time, salary and travel expense, witness fees and attorney fees.

Dated this 11th day of September, 2021.



Steven Frederick Richardson, B.A.
License No. PA 3060

Subscribed and sworn before me this _____ day of _____, 20____.

*See a Hatched
certificate*

Notary Public

My commission expires: _____

My commission number: _____

ACCEPTED:



Billy H. Stout, M.D., Board Secretary
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Dated: Dated this 15th day of SEPTEMBER, 2021

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A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Orange

Subscribed and sworn to (or affirmed) before me on this 11th day of September, 2021, by
Date Month Year

(1) Steven Frederick Richardson

(and (2) _____),
Name(s) of Signer(s)



proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

Signature *Michelle Lynn Jarvis*
Signature of Notary Public

Place Notary Seal and/or Stamp Above

OPTIONAL

Completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: Voluntary Surrender of License in Lieu of Prosecution
Document Date: 9/11/2021 Number of Pages: _____
Signer(s) Other Than Named Above: _____