

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

FILED

AUG - 7 2023

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

STATE OF OKLAHOMA *EX REL*)
OKLAHOMA STATE BOARD OF)
MEDICAL LICENSURE AND)
SUPERVISION,)

Case No. 23-03-6204

Plaintiff)

v.)

JOHN THOMAS BELK, M.D.,)
LICENSE NO. MD 30768)

Defendant.)

**DEFENDANT JOHN THOMAS BELK, M.D.'S
RESPONSE TO THE BOARD'S VERIFIED COMPLAINT**

COMES NOW the Defendant, John Thomas Belk, M.D. ("Defendant" or "Dr. Belk"), by and through his counsel of record from the law firm Rodolf & Todd, and hereby submits his *Response to the Board's Verified Complaint*. Dr. Belk generally denies the Board's allegations, and he further asserts that the Board's *Verified Complaint* exceeds the scope of the Board's statutorily granted jurisdiction and violates his substantive and procedural due process rights, as well as other affirmative defenses. Dr. Belk will file his *Motion to Dismiss* further asserting these defenses in the next ten days.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Emily Jones Ludiker", written over a horizontal line.

David A. Russell, OBA 15104

Emily Jones Ludiker, OBA 21719

RODOLF & TODD

15 East 5th Street, 6th Floor

Tulsa, OK 74103

918-295-2100

918-295-7800 (facsimile)

Attorneys for John Thomas Belk, M.D.

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of August, 2023, a true and accurate copy of the above and foregoing instrument was served via United States Mail, postage prepaid, addressed to:

Alex Pedraza
Assistant Attorney General
Oklahoma Office of the Attorney General
313 NE 21st Street
Oklahoma City, OK 73105
(405) 522-5264
Alex.Pedraza@oag.ok.gov
*Attorney for the State of Oklahoma
ex rel Oklahoma State Board of Medical
Licensure and Supervision*

Nancy Z. Holaday