

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

FILED

JUN 19 2024

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

STATE OF OKLAHOMA, *ex rel.*)
OKLAHOMA STATE BOARD)
OF MEDICAL LICENSURE)
AND SUPERVISION,)
)
Plaintiff,)
)
v.)
)
PARKER RICHARDSON, ANA,)
LICENSE NO. ANA 31,)
)
Defendant.)

Case No. 24-04-6324

VERIFIED COMPLAINT

The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision (“Board”), for its Verified Complaint against Parker Richardson (“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 anesthesiologist assistants in the State of Oklahoma. 59 O.S. § 3201, *et seq.* and Okla. Admin. Code 435:65-1-1, *et seq.*
2. In Oklahoma, Defendant holds Anesthesiologist Assistant license No. ANA 31 issued by the Board. The act(s) and/or omission(s) complained of herein were made while Defendant was licensed to practice physical therapy by the State of Oklahoma.

II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

3. Defendant’s Anesthesiologist Assistant License No. ANA 31 expired on October 31, 2023, after Defendant failed to timely renew.
4. Defendant was notified via e-mail on October 9, 2023, of failure to renew their license, including the necessary steps for renewal, but did not respond to said notification until April 9, 2024.
5. Defendant’s response to the Oklahoma Medical Board on April 9, 2024, included notification that his employer alerted him of his expired licenses and that he had practiced till mid-February.

6. Defendant continued to practice in the course of his employment following the October 31, 2023, expiration of his license, through at least February 29, 2024.
7. Defendant applied for reinstatement of his license with the Board on March 1, 2024.
8. The foregoing act(s) and/or omission(s) constitute unprofessional conduct as defined under the Anesthesiologist Assistant Act and corresponding regulations, as detailed herein.

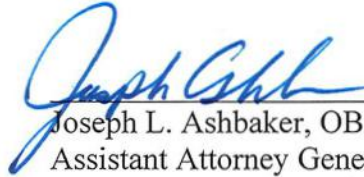
III. VIOLATIONS

9. Based on the foregoing, Defendant is guilty of unprofessional conduct as follows:
 - a. Practicing while not licensed in accordance with the provisions of the Anesthesiologist Assistant act, in violation of 59 O.S. § 3205.
 - b. Violating the rule and regulations of the Board, in violation of Okla. Admin. Code §435:65-3-1.
 - c. Engaging in unprofessional conduct as defined by the rules established by the Board, or of violating the code of ethics adopted and published by the Board, in violation of 59 O.S. § 3204(1), to wit:
 - i. Failing to timely make application for license renewal, in violation of Okla. Admin. Code §435:65-3-2(g).
 - ii. Violating any provision of the Anesthesiologist Assistant Act or rules promulgated by the Board, specifically the provisions of law cited above, in violation of Okla. Admin. Code §435:65-1-6(a).

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: 405.962.1400

Email: Joe.ashbaker@oag.ok.gov

VERIFICATION

I, Valeska Barr, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

1. I have read the above Complaint regarding Parker Richardson; and
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.



Valeska Barr, Assistant Director of

Licensing

OKLAHOMA STATE BOARD OF MEDICAL

LICENSURE AND SUPERVISION

Date:

June 19, 2024