

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

FILED

JUL 10 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

AMENDED 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 as an Anesthesiologist Assistant 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. Board Staff sent a Renewal Notice on September 6, 2023, to Defendant’s street address and his email address which were on file with the Board Staff.
5. Defendant applied and paid for a new application to practice as an ANA on October 8, 2023. Defendant was notified on October 9, 2023, that he had re-applied for a license instead of renewing his license and that he should renew instead. Defendant was informed of the necessary steps for renewal. Defendant did not respond until February 29, 2024.

6. 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 until mid-February.
7. 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.
8. Defendant applied for reinstatement of his license with the Board on March 1, 2024.
9. The foregoing act(s) and/or omission(s) constitute unprofessional conduct as defined under the Anesthesiologist Assistant Act and corresponding regulations, as detailed herein.

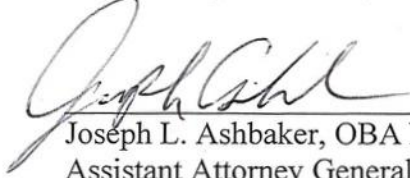
III. VIOLATIONS

10. 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,



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VERIFICATION

I, Lisa Cullen, 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.



Lisa Cullen, Director of Licensing
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Date:

