

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

**FILED**

JUN 12 2024

OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE & SUPERVISION

STATE OF OKLAHOMA, *ex rel.* )  
OKLAHOMA STATE BOARD )  
OF MEDICAL LICENSURE )  
AND SUPERVISION, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
GAYLA R. WATTS-SPARGER, R.C., )  
LICENSE NO. RC 3498, )  
 )  
Defendant. )

Case No. 24-04-6313

**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 Gayla R. Watts-Sparger, R.C. (“Defendant”):

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 physicians, surgeons and other allied health professionals in the State of Oklahoma pursuant to 59 Okla. Stat. § 480 et seq.

Defendant holds Oklahoma respiratory care license number 3498.

The acts and omissions complained of herein were made while Defendant was acting as a respiratory care provider pursuant to her license conferred upon her by the State of Oklahoma. Such acts and omissions occurred within the physical territory of the State of Oklahoma.

**I. ALLEGATIONS OF PROFESSIONAL MISCONDUCT**

This matter was initiated with an anonymous complaint informing Board staff that Defendant was arrested and plead guilty for driving under the influence of drugs.

An investigation was opened regarding this case. It was found that Defendant was arrested on or about June 11 2022. Defendant subsequently pled guilty to driving under the influence of drugs, in this case marijuana, and received an eighteen (18) month deferred sentence in Oklahoma County District Court case CM-2022-3242, on or about February 28, 2024.

On or about December 8, 2022, Defendant filed her Application for Renewal of Oklahoma License. Defendant answered “NO” to the questions “D. Have you been arrested for, charged with, or convicted of a felony or misdemeanor other than a traffic violation?” and “E. Have you

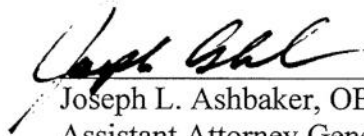
been arrested for, charged with, or convicted of a traffic violation involving the use of drugs or chemical substances and/or alcohol?”. Those answers were incorrect.

## II. VIOLATIONS

1. Based on the foregoing, the Defendant is guilty of professional misconduct as follows:
  - a. Conviction of, or confession or plea of no contest to, a drug related offense in violation of Okla. Admin. Code § 435:45-5-3(6),
  - b. Falsifying documents submitted to the Respiratory Care Advisory Committee or the Oklahoma State Board of Medical Licensure and Supervision in violation of Okla. Admin. Code § 435:45-5-3 (7),
  - c. Violating any provision of the Respiratory Care Practice Act or the rules promulgated by the Board in violation of 59 O.S. § 2040(9),

## III. CONCLUSION

Given the foregoing, the undersigned 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 the Defendant's professional license, including an assessment of costs and attorney's fees incurred in this action as provided by law.




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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 the Defendant, Gayla R. Watts-Sparger, R.C.; 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

Date: 6-12-24