

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

**FILED**

JUL 11 2023

OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE & SUPERVISION

STATE OF OKLAHOMA, *ex rel.* )  
OKLAHOMA STATE BOARD )  
OF MEDICAL LICENSURE )  
AND SUPERVISION, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
JULIA ELIZABETH VALLEY, RC, )  
LICENSE NO. RC 3845, )  
 )  
Defendant. )

Case No. 23-06-6237

**VERIFIED COMPLAINT**

The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision (“Board”), for its Verified Complaint against Julia Elizabeth Valley (“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 respiratory care practitioners in the State of Oklahoma. 59 O.S. § 2026, *et seq.* and Okla. Admin. Code 435:45-1-1 *et seq.*
2. In Oklahoma, Defendant holds Oklahoma License No. RC 3845 issued by the Board. The act(s) and/or omission(s) complained of herein were made while Defendant was licensed to practice respiratory care by the State of Oklahoma.

**II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT**

3. Defendant was initially licensed as a respiratory care practitioner by the Board on November 8, 2012.
4. Defendant’s license to practice respiratory care expired November 11, 2022.
5. Defendant continued to practice respiratory care in the course of her employment following the November 11, 2022, expiration of her license, through at least early April of 2023.
6. Defendant applied for reinstatement of her license with the Board on April 14, 2023.

7. The foregoing act(s) and/or omission(s) constitute unprofessional conduct as defined under the Respiratory Care Practice Act and corresponding regulations, as detailed herein.

### III. VIOLATIONS

8. Based on the foregoing, Defendant is guilty of violating the following relevant provisions of law:
- a. Practicing respiratory care after the license has expired or has been suspended, in violation of 59 O.S. § 2040(6);
  - b. 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. § 2040(9), to wit:
    - i. Failing to timely make application for license renewal, in violation of Okla. Admin. Code § 435:45-5-3(14);
    - ii. Violating any provision of the Respiratory Care Practice Act or rules promulgated by the Board, specifically the provisions of law cited above, in violation of Okla. Admin. Code § 435:45-5-3(21).

### IV. 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,

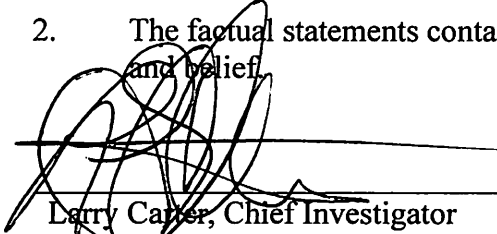


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**VERIFICATION**

I, Larry Carter, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

1. I have read the above Complaint regarding Julia Elizabeth Valley, RC.; and
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
Larry Carter, Chief Investigator  
OKLAHOMA STATE BOARD OF MEDICAL  
LICENSURE AND SUPERVISION

Date: 11 July 2023  
Oklahoma County, Ok  
County, State of Execution