

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

STATE OF OKLAHOMA, *ex rel.*)
OKLAHOMA STATE BOARD)
OF MEDICAL LICENSURE)
AND SUPERVISION,)
)
Plaintiff,)
)
v.)
)
JON MICHAEL DRAGOO, R.C.,)
LICENSE NO. RC 4878,)
)
Defendant.)

FILED

OCT - 6 2022

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 22-07-6141

VERIFIED COMPLAINT

The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision (“Board”), for its Verified Complaint against Jon Michael Dragoo, R.C. (“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 4878.

II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

3. Defendant has been licensed as a respiratory care practitioner by the Board since March 7, 2019.
4. Defendant presented to his place of employment, St. Francis Health System, Tulsa, OK, for his employment shift on June 17, 2022. During shift, Defendant was “suspected” by “multiple employees” of being under the influence of intoxicating substances. Defendant was asked to submit to a drug and alcohol analysis to which he voluntarily agreed. Defendant’s results were positive for alcohol, and Defendant was subsequently terminated on June 29, 2022 as a result.

III. VIOLATIONS

5. Based on the foregoing, Defendant is guilty of violating the following relevant provisions of law:
- a. Is guilty of dishonest or unethical conduct, in violation 59 O.S. 2040(5);
 - 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 59 O.S. 2040(9), to wit:
 - i. Any conduct which potentially or actually jeopardizes a patient's life, health or safety on violation of Okla. Admin. Code § 435:45-5-3(3);
 - ii. Negligence while in practice as a respiratory care practitioner or violating the "Standards of Ethics and Professional Conduct" adopted by the Board in violation of Okla. Admin. Code § 435:45-5-3(11);
 - iii. Violating any provision of the Respiratory Care Practice Act or the rules promulgated by the Board in violation of Okla. Admin. Code § 435:45-5-3(21);
 - iv. Violating any provision(s) of the medical practice act or the rules and regulations of the Board or of an action, stipulation, agreement or order of the Board, in violation of Okla. Admin. Code § 435:45-5-3(24);
 - v. Failure to demonstrate behavior that reflects integrity, supports objectivity, and fosters trust in the profession and its professionals, in violation of Okla. Admin. Code § 435:45-5-4(1); and
 - vi. Failure to refuse to participate in illegal or unethical acts, in violation of Okla. Admin. Code § 435:45-5-4(8).

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,



Alex A. Pedraza, OBA No. 33584
Assistant Attorney General

OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION
101 N.E. 51st Street
Oklahoma City, Oklahoma 73105
405.522.5264

VERIFICATION

I, Jim Stokes, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

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



Jim Stokes, Investigator
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Date:



County, State of Execution