

OKLAHOMA FUNERAL BOARD
3700 North Classen Blvd, Suite 175
Oklahoma City, Oklahoma 73118

NOTICE OF REGULAR MEETING

MEETING PLACE: Office of Chief Medical Examiner OKC, 921 N.E. 23rd Street
Conference Room 1st Floor Oklahoma City, OK 73105.

DATE & TIME: March 14, 2024 10:00AM

A copy of this notice of meeting and agenda has been posted in a prominent location at the office of the Oklahoma Funeral Board, 3700 North Classen Blvd Suite 175, Oklahoma City, Oklahoma, on March 11, 2024 at 9:00AM. A copy of this agenda is available on the Funeral Board website at www.oklahoma.gov/funeral

If you plan to attend a Board meeting for Continuing Education credit and would like a rough estimate of the length of time Board staff estimates the meeting might last, please email your request to info@funeral.ok.gov.

*** This symbol denotes the application and/or applicant is not in compliance with 235:1-1-2 (c) (14 day Rule)

ORDER OF BUSINESS: The Board may discuss, vote to approve, vote to disapprove, vote to table, change the sequence of any agenda item, or decide not to discuss any item on the agenda.

1. Roll Call
2. Approval of the February 8, 2024 Regular Board meeting minutes
3. Oklahoma Insurance Department Update from a Representative of OID, with possible discussion
4. Oklahoma Department of Health Update from a Representative of OSDH, with possible discussion
5. Review complaints with possible vote for probable cause or other action

24-18 Embalming Issues

24-29 Overcharging

24-30 Overcharging

6. Matters for consideration: Administrative Hearing, Consent Order, or Scheduling Order

At the conclusion of the parties' presentation and any questions or public discussion by the Board, the Board may in each complaint case:

- i. consider and vote on motion(s) to conduct executive session(s) pursuant to 25 O.S.2011, Section 307(B)(8) to engage in deliberations or rendering a final or intermediate decision in an individual proceeding pursuant to Article II of the Administrative Procedures Act;
- ii. if an executive session is held, designate a person to keep written minutes of the executive session;
- iii. consider and vote on motion(s) to exit executive session and return to open meeting; and
- iv. consider and vote on motion(s) regarding possible action to be taken regarding matter discussed in executive session.

6A. Complaint 23-16 Christopher Harrison, Funeral Director and Embalmer. Member Roberts needs to recuse.

6B. Complaint 23-72 Christopher Harrison, Funeral Director and Embalmer. Member Roberts needs to recuse.

6C. Complaint 24-08 Christopher Harrison, Funeral Director and Embalmer. Member Roberts needs to recuse.

6D. Complaint 24-20 Christopher Harrison, Funeral Director and Embalmer. Member Roberts needs to recuse.

7. Vote to affirm or disaffirm the issuance of the following licenses, registrations, certificates, dissolution or other action

A. Apprenticeship (Original)

1. Gabriella Hawkins, Norman, Havenbrook, Norman
2. Larry Valdez, Lawton, Comanche Nation, Lawton
3. Robert Vincent, Arnett, Shaw FH, Vici

4. Megan Parker, Owasso, Mowery, Owasso
5. Alesia Mann, Moore, Tribute Memorial Care, Norman
6. Grace Holesapple, Jones, Crawford, Edmond
7. Kierra Hayes, Spencer, Howard Harris, OKC

B. Apprenticeship (1st extension)

1. Zachary Graves, Stilwell, Roberts-Reed-Culver, Stilwell
2. Shealyn Wilds, Stilwell, Roberts-Reed-Culver, Stilwell
3. Colton Morgan, Duncan, Whitt FH, Duncan
4. Rylan McPeak, Idabel, Miller & Miller FH, Hugo
5. Christopher Lowe, Duncan, Whitt FH, Duncan
6. Becky Shupe, Ponca City, Grace Memorial, Ponca City (EM Only)
7. Sonja Pellegrin, OKC, Ingram, Smith, and Turner, Yukon
8. Kimberly Lucas, Choctaw, Barnes Friederich, MWC
9. Lezzy Olmedo, Tulsa, Parks Brothers, Prague
10. Sonya Hamilton, OKC, Vondel Smith, OKC
11. William Watkins, Lawton, Whinery-Huddleston, Lawton
12. Amy Borazjani, Tuttle, Tribute Memorial Care, Tuttle
13. Lauren Sloan, Sapulpa, Smith FH, Sapulpa
14. Quade Varner, OKC, Alternative Cremation, OKC
15. Ty Astle, OKC, OMS, OKC (EM Only)

C. Apprenticeship (2nd Extension)

1. Darin Haddox, Claremore, MMS-Payne FH, Claremore

D. Apprenticeship (3rd Extension)

1. Mike Hopkins, Broken Arrow, Hopkins Funeral Service, Collinsville

E. Funeral Director and/or Embalmer (Reciprocal)

1. Garrett Lundberg, Arkansas

F. Funeral Director and/or Embalmer (Original)

1. Riley Caple, Catoosa (FD Only)

G. Establishments

1. Hopkins-Reynolds FS, Collinsville, request to change name to Hopkins Funeral Service
2. Cruz Family FH, OKC, request to change FDIC from Jocelyn Bell to Mylei Saysana
3. Twin Creek Cremation and Funeral Service, Mustang, New Establishment, AJ & K, LLC, Mustang, Owner, Alec Dyer, Yukon, FDIC

8. **New Business.** Any matter not known about or which could not have been reasonably foreseen prior to the time of posting the agenda or any revised agenda. 25 O.S. Section 311.9.

9. Executive Director's Report

- A. Agency Financial Update
- B. 2024 Legislative Session Bills- HB2959, SB1196, SB1602

10. Strategic Planning: Discussion and possible action regarding change of Board Statutes or Board Rules:

- A. Committee report, committee discussion, and Board discussion for Updating Cremation Statutes and Rules
- B. Committee report, committee discussion, and Board discussion for Funeral Director Assistant License

11. Matters for consideration: Executive Director

- i. Discussion and possible action on the employment, hiring,

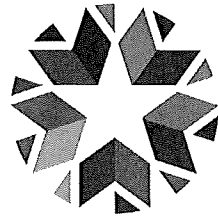
appointment, promotion, demotion, disciplining, or resignation of the Executive Director.

- ii. Vote on possible executive session pursuant to 25 O.S. 2011, Section 307 (B) (1) Discussing the employment, hiring, appointment, promotion, demotion, disciplining or resignation of the Executive Director.
- iii. if an executive session is held, designate a person to keep written minutes of the executive session;
- iv. consider and vote on motion(s) to exit executive session and return to open meeting; and
- v. consider and vote on motion(s) regarding possible action to be taken regarding matter discussed in executive session.

12. Adjournment

Tyler Stiles, MBA
Executive Director

The next regular meeting of the Oklahoma Funeral Board will be held: April 11, 2024. Office of Chief Medical Examiner –OKC 921 N.E. 23rd Street Conference Room – 1st Floor Oklahoma City, OK 73105.



OKLAHOMA Funeral Board

MINUTES OF A REGULAR MEETING

OKLAHOMA FUNERAL BOARD
3700 N. Classen, Suite 175
Oklahoma City, Oklahoma 73118

February 8, 2024

BOARD MEMBERS

Tom Coble
Darin Corbett
Glenn Dunn
John Davenport
Joe Highberger
Brent Matherly
Jim Roberts

STAFF

Rochelle Covington
Tyler Stiles
Kylie Cooper, AAG
Liz Stevens, AAG

MEETING PLACE: MEETING PLACE:

If attending in person at the physical location: Office of Chief Medical Examiner OKC, 921 N.E. 23rd Street Conference Room 1st Floor Oklahoma City, OK 73105.

A copy of this notice of meeting and agenda has been posted in a prominent location at the office of the Oklahoma Funeral Board, 3700 North Classen Blvd Suite 175, Oklahoma City, Oklahoma, on February 6, 2024 at 9:30AM. A copy of this agenda is available on the Funeral Board website at www.ok.gov/funeral

President Roberts called the meeting to order at 10AM. Members Davenport, Dunn, Highberger, Matherly, and Roberts were present. Members Corbett and Coble were absent. A quorum was always present.

Motion by Highberger second by Davenport to approve the January 11, 2024 Regular Board meeting minutes. The motion passed unanimously.

Dustin Pierce with OKFDA provided the following update: The Association had a successful turnout for the District meetings. Lifeshare is offering tours for their facility and within 30 minutes of posting information about the tour, registration was full. OKFDA has spent \$10,000 on lobbying this year and they have met with Sen. McCortney, Senate leadership, and House leadership regarding the casket bill and believe the bill will not be heard this year. The author of the Natural Organic Reduction bill will not seek re-election but a new author is being sought. The convention will be March 11-13, 2024 and will have 8 hours of CE. A women's conference will be held in July.

Gloria Light with OID provided the following update: If funeral homes have insurance assignments or trusts, they need to submit their report by March 15. Contact Gloria with any questions. Gloria.light@oid.ok.gov

Motion by Highberger second by Roberts to find probable cause on complaint 24-09 regarding Pre-Need Issues. The motion passed unanimously.

Motion by Highberger second by Matherly to dismiss complaint 24-22 regarding Next of Kin Issues. The motion passed unanimously.

Motion by Highberger second by Dunn to dismiss complaint 24-25 regarding Unprofessional Funeral Home Staff. The motion passed unanimously.

Motion by Highberger second by Davenport to dismiss complaint 24-27 regarding Next of Kin Issues. The motion passed unanimously.

Regarding the matters for consideration: Administrative Hearing, Consent Order, or Scheduling Order: Complaint 23-16 Christopher Harrison, Funeral Director and Embalmer. No action was taken.

Regarding the matters for consideration: Administrative Hearing, Consent Order, or Scheduling Order: Complaint 23-60 Luginbuel Funeral Home, Vinita, Legacy Funeral Holding of Oklahoma LLC, Owner, Joseph Faulkner, FDIC, Colin Kirk, Apprentice. The prosecution was represented by Kylie Cooper, AAG. Liz Stevens, AAG, was the Board's legal advisor. Members Davenport, Dunn, Highberger, Matherly, and Roberts heard the case. Member Corbett was recused from the case and was not at the meeting.

After the presentation of the agreed upon Consent Order, motion by Roberts second by Highberger to accept the consent order. The consent order consisted of the following: The agreed violations were: unlicensed practice, material misrepresentation, aiding and abetting unlicensed practice, violation

of the Funeral Service Licensing Act, and Rules of the Board. The terms consisted of the following: Administrative Penalty of \$4,000 for Luginbuel Funeral Home, \$2,500 for Joseph Faulkner, \$2,000 for Colin Kirk, refund of \$1,150, Joseph Faulkner shall complete 12 additional hours of CE for 2024 and 12 for 2025, 1 year of reporting probation, and \$750 costs. The motion passed unanimously.

Regarding the matters for consideration: Administrative Hearing, Consent Order, or Scheduling Order: Complaint 23-72 Christopher Harrison, Funeral Director and Embalmer. No action was taken.

Regarding the matters for consideration: Administrative Hearing, Consent Order, or Scheduling Order: Complaint 24-08 Christopher Harrison, Funeral Director and Embalmer. No action was taken.

Regarding the matters for consideration: Administrative Hearing, Consent Order, or Scheduling Order: Complaint 24-20 Christopher Harrison, Funeral Director and Embalmer. No action was taken.

Motion by Matherly second by Highberger to approve the following: Apprenticeship (Original) Ainsley Butterfield, Plano, Smith & Kernke, OKC; Lilly Close, Copan, Stumpf FH, Bartlesville; Alexander Marshall, Alva, Marshall FH, Alva; Laci Duffy, Enid, Anderson Burris, Enid. The motion passed unanimously.

Motion by Roberts second by Highberger to table the following: Apprenticeship (1st extension) Zachary Graves, Stilwell, Roberts-Reed-Culver, Stilwell; Shealyn Wilds, Stilwell, Roberts-Reed-Culver, Stilwell; Colton Morgan, Duncan, Whitt FH, Duncan; Rylan McPeak, Idabel, Miller & Miller FH, Hugo. The motion passed unanimously.

Motion by Highberger second by Davenport to approve the following: Apprenticeship (1st extension) Aidan Parker, OKC, Chapel Hill, OKC; Dennis Baker, Kingfisher, Sanders FS, Kingfisher, (FD Only); Philip Seeley, Stillwater, Strode FH, Stillwater; Lorna Schofield, Park Hill, Reed-Culver FH, Tahlequah. The motion passed unanimously.

Motion by Matherly second by Highberger to approve the following: Apprenticeship (2nd Extension). Kenslie Villoni, Tulsa, Floral Haven FH, Broken Arrow; Breece Low, Edmond, Baggerley FH, Edmond; Caitlin Snell, Rose, Shipman's, Pryor, (FD Only); Lewis Robinson III, Guthrie, Community, Guthrie. The motion passed unanimously.

Motion by Matherly second by Highberger to approve the following: Apprenticeship (3rd Extension). Perry Simpson, Noble, McMahan FH, Noble. The motion passed unanimously.

Motion by Matherly second by Highberger to approve the following: Funeral Director and/or Embalmer (Reciprocal), Dylan DeStafano, Virginia. The motion passed unanimously.

Motion by Matherly second by Highberger to table the following: Funeral Director and/or Embalmer (Reciprocal), Garrett Lundberg, Arkansas. The motion passed unanimously.

Motion by Matherly second by Highberger to approve the following: Funeral Director and/or Embalmer (Original) Lawanda Colbert, Midwest City (FD Only); Amy Kinsey, Pryor; Karley Page, Muskogee; Harlea Walker, Broken Arrow; Kristen Wajda, Moore (FD Only). The motion passed unanimously.

Motion by Matherly second by Highberger to approve the following: Establishments, Moore Funeral & Cremation, Moore, request to change FDIC from Michael Kelly to Megan Dorman; Whinery-Huddleston FS, Lawton, request to change FDIC from Amber Woommavovah to Randilyn Walker; Community FH, Guthrie, request to change FDIC from Monica Kroier to Lyndel Hamilton; Affordable Cremation, OKC, request to change FDIC from Monica Kroier to Lyndel Hamilton; Reynolds & Adamscrest FS, Tulsa, request to change FDIC from Nick Reynolds to Scott Holz; Fallon Mortuary, OKC, request to close establishment. The motion passed unanimously.

Motion by Matherly second by Highberger to approve the following: Crematories, Great Plains Cremation Service, Lawton, Lawton, request to change FDIC from Amber Woommavovah to Randilyn Walker. The motion passed unanimously.

There was no new business

Agency Financial update- Mr. Stiles reported gross receipts for January 2024 to be \$92,243.00 with \$8,999.30 going to the State of Oklahoma general fund. The expenses for the same timeframe totaled \$36,293.49 and net income after expenses totaled \$46,950.21.

2024 Legislative Session Bills- Mr. Stiles reported that a new session has started! Board staff will be tracking the following Bills closely this session.

HB1074, This is a carry over Bill allowing anyone to sell caskets without a license.

HB2671, This is a carry over Bill creating the Funerals Act. It is a shell Bill so we will track it to see what it will entail.

HB2959, Extends the sunset of the Funeral Board to 2027

HB2961, Creates the Oklahoma Sunset Act

SB356, Requires funeral establishments to provide consumers information of their subcontractors

SB599, Extends the medical certification completion to 14 days

SB957, Removes the requirement for mortuary schools to be accredited by the American Board

SB1444, Directs licensing agencies to use a central website for online applications and renewals

SB1602, Allows anyone to sell caskets without a license.

SB1637, Creates a license for Natural Organic Reduction (Human Composting)

SB1764, Requires licensing agencies to create a grid regarding how they penalize licensees.

Strategic Planning: Discussion and possible action regarding change of Board Statutes or Board Rules: Board discussion for Updating Cremation Statutes and Rules. There was no update.

The FD Assistant committee met and agreed that the Funeral Director Assistant should have the minimum requirements: 60 college credit hours, pass the law exam, submit quarterly reports, fee of \$250, 6 hours of continuing education, and 1 FDIC can only have 1 assistant. The committee wants to discuss requirements for an Embalmer Assistant and revise the requirements for Apprentices at the March meeting.

Motion by Highberger second by Matherly to adjourn the meeting at 10:27AM. The motion passed unanimously.

Jim Roberts
Oklahoma Funeral Board President

**BEFORE THE OKLAHOMA FUNERAL BOARD
STATE OF OKLAHOMA**

**IN THE MATTER OF THE COMPLAINT
AGAINST:**

Christopher Harrison

Licenses: 2927FD and 3308EM,

Address: 1300 North Lottie Ave

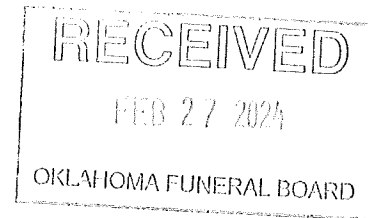
Oklahoma City, OK 73117

A Licensed Funeral Director and Embalmer
and the former Funeral Director in Charge
at

**HERITAGE FUNERAL HOME AND
CREMATION SERVICES, LLC,**

Respondent.

Complaint No. 23-16



COMPLAINT AND NOTICE OF HEARING

The State of Oklahoma, *ex rel.*, Oklahoma Funeral Board ("Board"), by and through Assistant Attorney General Kylie Cooper, files this Complaint and Notice of Hearing, alleging that the Respondent, CHRISTOPHER HARRISON has violated provisions of the State Funeral Services Licensing Act, 59 O.S. § 395.1 *et seq.* (the

“Act”), and Rules of the Board, Oklahoma Administrative Code (“O.A.C.”) Section 235:10-1-1 *et seq.* (the “Rules”), in the manner set forth below:

JURISDICTION

1. Respondent HERITAGE FUNERAL HOME AND CREMATION SERVICES (“Funeral Home”) was formerly licensed by the Board, establishment license number 1659ES, and was located at 1300 North Lottie Avenue, Oklahoma City, OK 73117.

2. Respondent CHRISTOPHER HARRISON (“Funeral Director in Charge” or “FDIC”) is licensed by the Board as a funeral director and embalmer, license numbers 2927FD and 3308EM, and at all relevant times was the Funeral Director in Charge at Funeral Home.

3. Respondent HERITAGE FUNERAL HOME AND CREMATION SERVICES LLC (“Owner”) is, and at all relevant times was, the owner of record for Funeral Home. Upon information and belief, Respondent CHRISTOPHER HARRISON is the owner and registered agent for Respondent HERITAGE FUNERAL HOME AND CREMATION SERVICES LLC.

4. The Board has jurisdiction over Respondents pursuant to 59 O.S. §§ 396.2a(9) and (11). *See also* 59 O.S. § 396.12f(F).

FACTUAL ALLEGATIONS

5. On or about September 21, 2022, Board staff received a letter from Jackson Brown at Stems & Stones Cemetery Services, stating that Heritage Funeral Home had a past due balance of \$2,747.73. Mr. Brown included copies of invoices.

6. On September 21, 2022, Board staff filed a complaint with the Board, alleging a violation of OAC 235:10-7-2(9), failure to discharge a financial obligation within 90 days. The Board

provided Respondents with the Notice of Complaint via certified letter, which was mailed on the date the complaint was filed.

7. On October 26, 2022, Respondents filed their response to Complaint 23-16 with the Board. Respondents state that they do not have any invoices from Jackson Brown. They further state that they've only spoken with Tom Brown at Stems & Stones and allege they do not have invoices.

8. By public vote during the meeting on July 13, 2023, the Board found probable cause to file a formal complaint against Respondents for the violations alleged herein.

9. The prosecution has sufficient evidence which, if presented to the Board at an evidentiary hearing, would constitute clear and convincing evidence of the alleged violations.

ALLEGED CONCLUSIONS OF LAW

10. Respondents violated O.A.C. 235:10-3-2(9) by failing to pay a vendor or third party obligation within 90 days.

11. FDIC is "responsible for the legal and ethical operation of the [Funeral Home] and is accountable to the Board." 59 O.S. § 396.2(12). Therefore, Respondent CHRISTOPHER HARRISON, as the Funeral Director in Charge of the Funeral Home is also liable for the above violations.

12. Due to the above violations, Respondents are subject to disciplinary action by the Board. *See* 59 O.S. §§ 396.2a(9) and (11); *id.* at §§ 396.12c(A)(5) and (8); *id.* at § 396.12d; *id.* at § 396.12e.

AUTHORIZED PENALTIES

13. The Board is authorized to impose any of the following penalties for violations of the Act or Rules: (1) denial, revocation, suspension, or nonrenewal of license or certificate of

apprenticeship; (2) administrative fines up to ten thousand dollars (\$10,000.00) per series of related violations¹; (3) injunctive proceedings; and (4) other disciplinary action. 59 O.S. §§ 396.12c(5) and (8); *id.* at § 396.12c; *id.* at § 396.12d; *id.* at § 396.12e.

14. Further, the Board is authorized to “impose . . . as a condition of any adverse disciplinary action, the payment of costs expended by the Board in investigating and prosecuting the violation.” 59 O.S. § 396.12e(B). Costs may include, but are not limited to, “staff time, salary and travel expenses, [and] witness fees and attorney fees.” *Id.*

15. In lieu of prosecution, Respondents “may elect to surrender the license.” *Id.* at § 396.12e(D). However, should Respondents surrender their licenses, they “shall be forever barred from obtaining a reissuance of said license or certificate of apprenticeship.” *Id.*

NOTICE OF HEARING

An **EVIDENTARY HEARING** will be held before the Board on **MARCH 14, 2024 at 10:00 A.M.** Respondents may appear personally or through an attorney. If Respondents fail to appear, the hearing will be held in their absence. Respondents have the right to submit a written response, cross-examine witnesses, and present evidence on their behalf. *See* 75 O.S. §§ 309 and 310. If the Board decides, after considering all the evidence presented, that Respondents are in violation of any of the above-referenced laws, the Board may take any authorized disciplinary action it deems appropriate.

Instead of proceeding with the aforementioned hearing, the parties may present a **JOINT**

¹ When determining the amount of an administrative penalty, the Board shall consider, but not be limited to:

the nature, circumstances and gravity of the violation and, with respect to the person or entity found to have committed the violation, the degree of culpability, the effect on ability of the person or entity to continue to do business and any show of good faith in attempting to achieve compliance with the provisions of the Funeral Services Licensing Act.

59 O.S. § 396.12e(C).

PROPOSED CONSENT ORDER to the Board on the same date and time. *See* 75 O.S. § 309(E).

Respectfully submitted:

A handwritten signature in black ink that reads "Kylie Cooper". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Kylie Cooper, OBA # 32758
Assistant Attorney General
Office of the Oklahoma Attorney General
313 NE 21st Street
Oklahoma City, OK 73105
kylie.cooper@oag.ok.gov

Attorney for Oklahoma Funeral Board

CERTIFICATE OF SERVICE

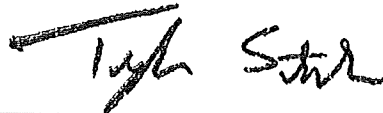
I hereby certify that on the 27 day of February, 2024, a true and correct copy of the foregoing *Complaint and Notice of Hearing* was served either mailing by Certified Mail or by E-Mail for service in person, as follows:

BY CERTIFIED MAIL:

Heritage Funeral Home and Cremation Services LLC
1300 North Lottie Ave
Oklahoma City, OK 73117
Cjharrison17@gmail.com

Christopher Harrison
1300 North Lottie Ave
Oklahoma City, OK
73117
Cjharrison17@gmail.com

Ronald Skip Kelly
205 NW 63rd St, STE 150
Oklahoma City, Ok 73116
Kellyron01@yahoo.com



Tyler Stiles, MBA
Executive Director

**BEFORE THE OKLAHOMA FUNERAL BOARD
STATE OF OKLAHOMA**

**IN THE MATTER OF THE COMPLAINT
AGAINST:**

Christopher Harrison

Licenses: 2927FD and 3308EM,

Address: 1300 North Lottie Ave

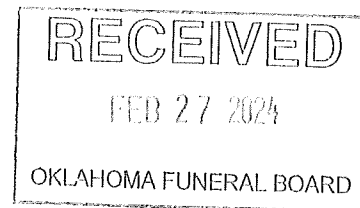
Oklahoma City, OK 73117

A Licensed Funeral Director and Embalmer
and the former Funeral Director in Charge
at

**HERITAGE FUNERAL HOME AND
CREMATION SERVICES, LLC,**

Complaint No. 23-72

Respondent.



COMPLAINT AND NOTICE OF HEARING

The State of Oklahoma, *ex rel.*, Oklahoma Funeral Board ("Board"), by and through Assistant Attorney General Kylie Cooper, files this Complaint and Notice of Hearing, alleging that the Respondent, CHRISTOPHER HARRISON, has violated provisions of the State Funeral Services Licensing Act, 59 O.S. § 395.1 *et seq.* (the

“Act”), and Rules of the Board, Oklahoma Administrative Code (“O.A.C.”) Section 235:10-1-1 *et seq.* (the “Rules”), in the manner set forth below:

JURISDICTION

1. Respondent HERITAGE FUNERAL HOME AND CREMATION SERVICES (“Funeral Home”) was formerly licensed by the Board, establishment license number 1659ES, and was located at 1300 North Lottie Avenue, Oklahoma City, OK 73117.

2. Respondent CHRISTOPHER HARRISON (“Funeral Director in Charge” or “FDIC”) is licensed by the Board as a funeral director and embalmer, license numbers 2927FD and 3308EM, and at all relevant times was the Funeral Director in Charge at Funeral Home.

3. Respondent HERITAGE FUNERAL HOME AND CREMATION SERVICES LLC (“Owner”) is, and at all relevant times was, the owner of record for Funeral Home. Upon information and belief, Respondent CHRISTOPHER HARRISON is the owner and registered agent for Respondent HERITAGE FUNERAL HOME AND CREMATION SERVICES LLC.

4. The Board has jurisdiction over Respondents pursuant to 59 O.S. §§ 396.2a(9) and (11). *See also* 59 O.S. § 396.12f(F).

FACTUAL ALLEGATIONS

5. On or about June 16, 2023, Board staff received a complaint from Monarch Resources, stating that Heritage Funeral Home had a past due balance of \$175.38. Invoices were included.

6. On June 19, 2023, Board staff filed a complaint with the Board, alleging a violation of OAC 235:10-7-2(9), failure to discharge a financial obligation within 90 days. The Board provided Respondents with the Notice of Complaint via email.

7. On July 28, 2023, Respondents filed their response to Complaint 23-72 with the Board. Respondents state that the balance to Monarch Resources had been paid.

8. By public vote during the meeting on August 10, 2023, the Board found probable cause to file a formal complaint against Respondents for the violations alleged herein.

9. The prosecution has sufficient evidence which, if presented to the Board at an evidentiary hearing, would constitute clear and convincing evidence of the alleged violations.

ALLEGED CONCLUSIONS OF LAW

10. Respondents violated O.A.C. 235:10-3-2(9) by failing to pay a vendor or third-party obligation within 90 days.

11. FDIC is “responsible for the legal and ethical operation of the [Funeral Home] and is accountable to the Board.” 59 O.S. § 396.2(12). Therefore, Respondent CHRISTOPHER HARRISON, as the Funeral Director in Charge of the Funeral Home is also liable for the above violations.

12. Due to the above violations, Respondents are subject to disciplinary action by the Board. *See* 59 O.S. §§ 396.2a(9) and (11); *id.* at §§ 396.12c(A)(5) and (8); *id.* at § 396.12d; *id.* at § 396.12e.

AUTHORIZED PENALTIES

13. The Board is authorized to impose any of the following penalties for violations of the Act or Rules: (1) denial, revocation, suspension, or nonrenewal of license or certificate of apprenticeship; (2) administrative fines up to ten thousand dollars (\$10,000.00) per series of related

violations¹; (3) injunctive proceedings; and (4) other disciplinary action. 59 O.S. §§ 396.12c(5) and (8); *id.* at § 396.12c; *id.* at § 396.12d; *id.* at § 396.12e.

14. Further, the Board is authorized to “impose . . . as a condition of any adverse disciplinary action, the payment of costs expended by the Board in investigating and prosecuting the violation.” 59 O.S. § 396.12e(B). Costs may include, but are not limited to, “staff time, salary and travel expenses, [and] witness fees and attorney fees.” *Id.*

15. In lieu of prosecution, Respondents “may elect to surrender the license.” *Id.* at § 396.12e(D). However, should Respondents surrender their licenses, they “shall be forever barred from obtaining a reissuance of said license or certificate of apprenticeship.” *Id.*

NOTICE OF HEARING

An **EVIDENTARY HEARING** will be held before the Board on **MARCH 14, 2024 at 10:00 A.M.** Respondents may appear personally or through an attorney. If Respondents fail to appear, the hearing will be held in their absence. Respondents have the right to submit a written response, cross-examine witnesses, and present evidence on their behalf. *See* 75 O.S. §§ 309 and 310. If the Board decides, after considering all the evidence presented, that Respondents are in violation of any of the above-referenced laws, the Board may take any authorized disciplinary action it deems appropriate.

Instead of proceeding with the aforementioned hearing, the parties may present a **JOINT PROPOSED CONSENT ORDER** to the Board on the same date and time. *See* 75 O.S. § 309(E).

¹ When determining the amount of an administrative penalty, the Board shall consider, but not be limited to:

the nature, circumstances and gravity of the violation and, with respect to the person or entity found to have committed the violation, the degree of culpability, the effect on ability of the person or entity to continue to do business and any show of good faith in attempting to achieve compliance with the provisions of the Funeral Services Licensing Act.

59 O.S. § 396.12e(C).

Respectfully submitted:

A handwritten signature in black ink that reads "Kylie Cooper". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Kylie Cooper, OBA # 32758
Assistant Attorney General
Office of the Oklahoma Attorney General
313 NE 21st Street
Oklahoma City, OK 73105
kylie.cooper@oag.ok.gov

Attorney for Oklahoma Funeral Board

CERTIFICATE OF SERVICE

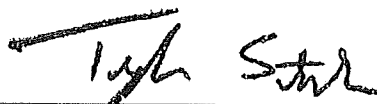
I hereby certify that on the 27 day of February, 2024, a true and correct copy of the foregoing *Complaint and Notice of Hearing* was served either mailing by E-Mail or by handing to a process server for service in person, as follows:

BY CERTIFIED MAIL:

Heritage Funeral Home and Cremation Services LLC
1300 North Lottie Ave
Oklahoma City, OK 73117
Cjharrison17@gmail.com

Christopher Harrison
1300 North Lottie Ave
Oklahoma City, OK
73117
Cjharrison17@gmail.com

Ronald Skip Kelly
205 NW 63rd St, STE 150
Oklahoma City, OK 73116
Kellyron01@yahoo.com



Tyler Stiles, MBA
Executive Director

**BEFORE THE OKLAHOMA FUNERAL BOARD
STATE OF OKLAHOMA**

**IN THE MATTER OF THE COMPLAINT
AGAINST:**

Christopher Harrison

Licenses: 2927FD and 3308EM,

Address: 1300 North Lottie Ave

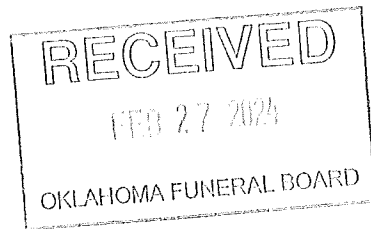
Oklahoma City, OK 73117

A Licensed Funeral Director and Embalmer
and the former Funeral Director in Charge
at

**HERITAGE FUNERAL HOME AND
CREMATION SERVICES, LLC,**

Complaint No. 24-08

Respondent.



COMPLAINT AND NOTICE OF HEARING

The State of Oklahoma, *ex rel.*, Oklahoma Funeral Board ("Board"), by and through Assistant Attorney General Kylie Cooper, files this Complaint and Notice of Hearing, alleging that the Respondent, CHRISTOPHER HARRISON, has violated provisions of the State Funeral Services Licensing Act, 59 O.S. § 395.1 *et seq.* (the

“Act”), and Rules of the Board, Oklahoma Administrative Code (“O.A.C.”) Section 235:10-1-1 *et seq.* (the “Rules”), in the manner set forth below:

JURISDICTION

1. Respondent HERITAGE FUNERAL HOME AND CREMATION SERVICES (“Funeral Home”) was formerly licensed by the Board, establishment license number 1659ES, and was located at 1300 North Lottie Avenue, Oklahoma City, OK 73117.

2. Respondent CHRISTOPHER HARRISON (“Funeral Director in Charge” or “FDIC”) is licensed by the Board as a funeral director and embalmer, license numbers 2927FD and 3308EM, and at all relevant times was the Funeral Director in Charge at Funeral Home.

3. Respondent HERITAGE FUNERAL HOME AND CREMATION SERVICES LLC (“Owner”) is, and at all relevant times was, the owner of record for Funeral Home. Upon information and belief, Respondent CHRISTOPHER HARRISON is the owner and registered agent for Respondent HERITAGE FUNERAL HOME AND CREMATION SERVICES LLC.

4. The Board has jurisdiction over Respondents pursuant to 59 O.S. §§ 396.2a(9) and (11). *See also* 59 O.S. § 396.12f(F).

FACTUAL ALLEGATIONS

5. On or about August 22, 2023, Board staff received a complaint from a consumer, stating that she lost one of her sons in February and another son in March. At the time of her complaint, she had not received the death certificate for either of her children and had not received the cremated remains for either child, and she had not received the urns purchased.

6. On August 22, 2023, Board staff processed the complaint with the Board, alleging a violation of OAC 235:10-7-2(14), failure to file a death certificate, cremation permit, disinterment permit. The Board provided Respondents with the Notice of Complaint via email.

7. On December 6, 2023, Respondents filed their response to Complaint 24-08 with the Board. Respondents stated that one death certificate has discrepancies regarding the date of death, and they forwarded a correction email to the “OCME.” Regarding the other death certificate, Respondent states that the delay was due to an investigation into the cause of death. The cause of death was certified on 11/29/2023.
8. By public vote during the meeting on December 14, 2023, the Board found probable cause to file a formal complaint against Respondents for the violations alleged herein.
9. The prosecution has sufficient evidence which, if presented to the Board at an evidentiary hearing, would constitute clear and convincing evidence of the alleged violations.

ALLEGED CONCLUSIONS OF LAW

10. Respondents violated O.A.C. 235:10-3-2(14) by failing to file a death certificate, cremation permit, disinterment permit or any other necessary permit as required by law in a timely manner.
11. FDIC is “responsible for the legal and ethical operation of the [Funeral Home] and is accountable to the Board.” 59 O.S. § 396.2(12). Therefore, Respondent CHRISTOPHER HARRISON, as the Funeral Director in Charge of the Funeral Home is also liable for the above violations.
12. Due to the above violations, Respondents are subject to disciplinary action by the Board. *See* 59 O.S. §§ 396.2a(9) and (11); *id.* at §§ 396.12c(A)(5) and (8); *id.* at § 396.12d; *id.* at § 396.12e.

AUTHORIZED PENALTIES

13. The Board is authorized to impose any of the following penalties for violations of the Act or Rules: (1) denial, revocation, suspension, or nonrenewal of license or certificate of apprenticeship; (2) administrative fines up to ten thousand dollars (\$10,000.00) per series of related

violations¹; (3) injunctive proceedings; and (4) other disciplinary action. 59 O.S. §§ 396.12c(5) and (8); *id.* at § 396.12c; *id.* at § 396.12d; *id.* at § 396.12e.

1. Further, the Board is authorized to “impose . . . as a condition of any adverse disciplinary action, the payment of costs expended by the Board in investigating and prosecuting the violation.” 59 O.S. § 396.12e(B). Costs may include, but are not limited to, “staff time, salary and travel expenses, [and] witness fees and attorney fees.” *Id.*
2. In lieu of prosecution, Respondents “may elect to surrender the license.” *Id.* at § 396.12e(D). However, should Respondents surrender their licenses, they “shall be forever barred from obtaining a reissuance of said license or certificate of apprenticeship.” *Id.*

NOTICE OF HEARING

An **EVIDENTARY HEARING** will be held before the Board on **MARCH 14, 2024 at 10:00 A.M.** Respondents may appear personally or through an attorney. If Respondents fail to appear, the hearing will be held in their absence. Respondents have the right to submit a written response, cross-examine witnesses, and present evidence on their behalf. *See* 75 O.S. §§ 309 and 310. If the Board decides, after considering all the evidence presented, that Respondents are in violation of any of the above-referenced laws, the Board may take any authorized disciplinary action it deems appropriate.

Instead of proceeding with the aforementioned hearing, the parties may present a **JOINT PROPOSED CONSENT ORDER** to the Board on the same date and time. *See* 75 O.S. § 309(E).

¹ When determining the amount of an administrative penalty, the Board shall consider, but not be limited to:

the nature, circumstances and gravity of the violation and, with respect to the person or entity found to have committed the violation, the degree of culpability, the effect on ability of the person or entity to continue to do business and any show of good faith in attempting to achieve compliance with the provisions of the Funeral Services Licensing Act.

Respectfully submitted:

A handwritten signature in black ink that reads "Kylie Cooper". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Kylie Cooper, OBA # 32758
Assistant Attorney General
Office of the Oklahoma Attorney General
313 NE 21st Street
Oklahoma City, OK 73105
kylie.cooper@oag.ok.gov

Attorney for Oklahoma Funeral Board

CERTIFICATE OF SERVICE

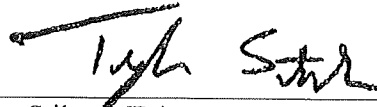
I hereby certify that on the 27 day of February, 2024, a true and correct copy of the foregoing *Complaint and Notice of Hearing* was served either mailing by E-Mail or by handing to a process server for service in person, as follows:

BY CERTIFIED MAIL:

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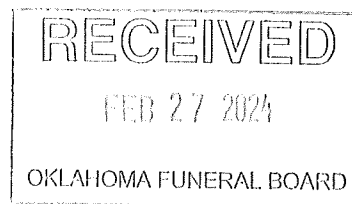
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Complaint No. 24-20

Respondent.



COMPLAINT AND NOTICE OF HEARING

The State of Oklahoma, *ex rel.*, Oklahoma Funeral Board ("Board"), by and through Assistant Attorney General Kylie Cooper, files this Complaint and Notice of Hearing, alleging that the Respondent, CHRISTOPHER HARRISON, has violated provisions of the State Funeral Services Licensing Act, 59 O.S. § 395.1 *et seq.* (the

“Act”), and Rules of the Board, Oklahoma Administrative Code (“O.A.C.”) Section 235:10-1-1 *et seq.* (the “Rules”), in the manner set forth below:

JURISDICTION

1. Respondent HERITAGE FUNERAL HOME AND CREMATION SERVICES (“Funeral Home”) was formerly licensed by the Board, establishment license number 1659ES, and was located at 1300 North Lottie Avenue, Oklahoma City, OK 73117.

2. Respondent CHRISTOPHER HARRISON (“Funeral Director in Charge” or “FDIC”) is licensed by the Board as a funeral director and embalmer, license numbers 2927FD and 3308EM, and at all relevant times was the Funeral Director in Charge at Funeral Home.

3. Respondent HERITAGE FUNERAL HOME AND CREMATION SERVICES LLC (“Owner”) is, and at all relevant times was, the owner of record for Funeral Home. Upon information and belief, Respondent CHRISTOPHER HARRISON is the owner and registered agent for Respondent HERITAGE FUNERAL HOME AND CREMATION SERVICES LLC.

4. The Board has jurisdiction over Respondents pursuant to 59 O.S. §§ 396.2a(9) and (11). *See also* 59 O.S. § 396.12f(F).

FACTUAL ALLEGATIONS

5. On or about November 13, 2023, Board staff received a complaint from Central Burial Vaults Inc., regarding three invoices totaling \$3,545.00. They alleged that Respondent had not paid the invoices within 90 days. The invoices were included in the complaint.

6. On November 13, 2023, Board staff processed the complaint with the Board, alleging a violation of OAC 235:10-7-2(9), failure to discharge a financial obligation within 90 days. The Board provided Respondents with the Notice of Complaint via email.

7. On December 6, 2023, Respondents filed their response to Complaint 24-20 with the Board. Respondents state that they have ceased operations of Heritage Funeral Home and were working to address outstanding matters.
8. By public vote during the meeting on December 14, 2023, the Board found probable cause to file a formal complaint against Respondents for the violations alleged herein.
9. The prosecution has sufficient evidence which, if presented to the Board at an evidentiary hearing, would constitute clear and convincing evidence of the alleged violations.

ALLEGED CONCLUSIONS OF LAW

10. Respondents violated O.A.C. 235:10-3-2(9) by failing to pay a vendor or third-party obligation within 90 days.
11. FDIC is “responsible for the legal and ethical operation of the [Funeral Home] and is accountable to the Board.” 59 O.S. § 396.2(12). Therefore, Respondent CHRISTOPHER HARRISON, as the Funeral Director in Charge of the Funeral Home is also liable for the above violations.
12. Due to the above violations, Respondents are subject to disciplinary action by the Board. *See* 59 O.S. §§ 396.2a(9) and (11); *id.* at §§ 396.12c(A)(5) and (8); *id.* at § 396.12d; *id.* at § 396.12e.

AUTHORIZED PENALTIES

13. The Board is authorized to impose any of the following penalties for violations of the Act or Rules: (1) denial, revocation, suspension, or nonrenewal of license or certificate of apprenticeship; (2) administrative fines up to ten thousand dollars (\$10,000.00) per series of related

violations¹; (3) injunctive proceedings; and (4) other disciplinary action. 59 O.S. §§ 396.12c(5) and (8); *id.* at § 396.12c; *id.* at § 396.12d; *id.* at § 396.12e.

14. Further, the Board is authorized to “impose . . . as a condition of any adverse disciplinary action, the payment of costs expended by the Board in investigating and prosecuting the violation.” 59 O.S. § 396.12e(B). Costs may include, but are not limited to, “staff time, salary and travel expenses, [and] witness fees and attorney fees.” *Id.*

15. In lieu of prosecution, Respondents “may elect to surrender the license.” *Id.* at § 396.12e(D). However, should Respondents surrender their licenses, they “shall be forever barred from obtaining a reissuance of said license or certificate of apprenticeship.” *Id.*

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Instead of proceeding with the aforementioned hearing, the parties may present a **JOINT PROPOSED CONSENT ORDER** to the Board on the same date and time. *See* 75 O.S. § 309(E).

¹ When determining the amount of an administrative penalty, the Board shall consider, but not be limited to:

the nature, circumstances and gravity of the violation and, with respect to the person or entity found to have committed the violation, the degree of culpability, the effect on ability of the person or entity to continue to do business and any show of good faith in attempting to achieve compliance with the provisions of the Funeral Services Licensing Act.

59 O.S. § 396.12e(C).

Respectfully submitted:

A handwritten signature in black ink that reads "Kylie Cooper". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Kylie Cooper, OBA # 32758
Assistant Attorney General
Office of the Oklahoma Attorney General
313 NE 21st Street
Oklahoma City, OK 73105
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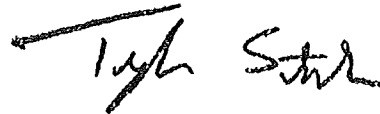
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