

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: May 9, 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 May 7, 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.

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 April 11, 2024 Regular Board meeting minutes
3. Oklahoma Funeral Director's Association Update from a Representative of OKFDA, with possible discussion
4. Oklahoma Insurance Department Update from a Representative of OID, with possible discussion
5. 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.

5A. Complaint 23-16 Christopher Harrison, Funeral Director and Embalmer. Member Roberts needs to recuse.

5B. Complaint 23-72 Christopher Harrison, Funeral Director and Embalmer. Member Roberts needs to recuse.

5C. Complaint 24-08 Christopher Harrison, Funeral Director and Embalmer. Member Roberts needs to recuse.

5D. Complaint 24-20 Christopher Harrison, Funeral Director and Embalmer. Member Roberts needs to recuse.

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

A. Apprenticeship (Original)

1. Faith Ziegler, Stillwater, Baggerley, Edmond
2. Sherry Gray, Wilson, Alexander Gray, Wilson(EM only)
3. Chia Minn Loo, Edmond, Mercer-Adams, Bethany
4. Carolyn Randolph, Elk City, Ray & Martha's, Hobart
5. Faith Alvarez, Edmond, Barnes & Friederich, MWC
6. Douglas Bevill, Jr., Cleveland, Chapman-Black, Cleveland (FD only)

B. Apprenticeship (1st Extension)

1. Robert Bethany, Catoosa, Rice, Catoosa
2. Reagan Crenshaw, Edmond, Baggerley, Edmond

3. Brittany Yeager, Weatherford, Lockstone, Weatherford

C. Apprenticeship (2nd Extension)

1. Holland Dugdale, Glenpool, McClendon-Winters, Okmulgee

2. Nicole Albee, MWC, Corbett, OKC

D. Funeral Director and/or Embalmer (Reciprocal)

1. Brad Pingel, Texas (FD Only)

E. Funeral Director and/or Embalmer (Original)

1. Thomas Applegate, Wagoner

2. Dena Cassell, Chattanooga

3. Chad Kaminski, Ada

4. Jessica Ramirez, Purcell (EM only)

5. Jackson Williams, Tulsa (EM only)

F. Establishments

1. Kiesau-Lee FH, Clinton request to change FDIC from Brandon Lee to Troy Lee

2. DeArman's FH, Sulphur request to close establishment

3. DeArman's FH, Sulphur, New Establishment, DeArman Properties, Inc, Owner, Joe DeArman, FDIC, request for temporary location and exemptions per 59-396.2a(19)

7. **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.

8. **Executive Director's Report**

A. Agency Financial Update

B. 2024 Legislative Session Bills- HB2959, SB707, SB1602, SB2038

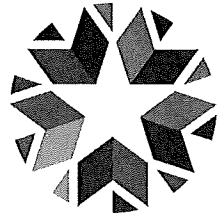
9. Strategic Planning: Discussion and possible action regarding change of Board Statutes or Board Rules:

- A. Committee report, committee discussion, and Board discussion for Updating Cremation Statutes and Rules

10. Adjournment

Tyler Stiles, MBA
Executive Director

The next regular meeting of the Oklahoma Funeral Board will be held: June 13, 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

April 11, 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 April 8, 2024 at 9:00AM. 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 Coble, Corbett, Davenport, Dunn, Highberger, and Roberts were present. Member Matherly was absent. A quorum was always present.

Motion by Highberger second by Corbett to approve the March 14, 2024 Regular Board meeting minutes. The motion passed unanimously with member Coble abstaining.

Ronnie Dighton with OKFDA provided the following update: SB1602, merchandising bill, will not move forward this year and has been defeated.

OID did not provide an update

Dawn Plumb and Christen Johnston with the OSDH provided the following update: ROVER NextGen is anticipated to go live in 2024. It was initially anticipated to go live in May but that is no longer the case. A new vendor is building the system. The OSDH is offering training for the new system that includes videos and an environment for practicing with the new system. President Roberts informed others that Kansas has a Death Certificate system that Oklahoma Funeral Directors are eligible to enroll with to file Kansas Certificates. Those instructions follow the Board meeting notes.

Motion by Highberger second by Roberts to dismiss complaint 24-24 regarding Pre-need Issues due to lack of jurisdiction. The motion passed unanimously.

Motion by Highberger second by Roberts to find probable cause on complaint 24-32 regarding Vendor Payment Issues. The motion passed unanimously.

Motion by Highberger second by Roberts to dismiss complaint 24-34 regarding Holding a Body for Payment with a letter of concern. The motion passed unanimously with member Corbett abstaining.

Regarding the matters for consideration: Administrative Hearing, Consent Order, or Scheduling Order: Complaints 23-16, 23-72, 24-08, and 24-20 Christopher Harrison, Funeral Director and Embalmer. Motion by Highberger second by Dunn to follow the previous Scheduling Order and move the matter to May. The motion passed unanimously with Member Roberts Abstaining.

Motion by Roberts second by Highberger to approve the following: Apprenticeship (Original) NeKiesha Flowers, OKC, Howard Harris, OKC; Caris Vick, Edmond, Smith & Kernke, OKC; Nicole Haynie, Tulsa, Floral Haven, Broken Arrow; Robert Glanville, (FD Only), McAlester, Bishop, McAlester; Rylee Estes, Locust Grove, Locust Grove, Locust Grove; Joshua Cruz, Purcell, Cruz Family FH, OKC; Ty Astle, OKC, OMS-OKC, Mercer-Adams, Bethany. The motion passed unanimously.

Motion by Roberts second by Highberger to approve the following: Apprenticeship (1st extension) Christopher Lowe, Duncan, Whitt FH, Duncan; Ruth Ewing, MWC, Barnes & Friederich, MWC; Natalee Pryor, Edmond, Matthews, Edmond; Dena Cassell, Chattanooga, Lawton Ritter Gray, Lawton. The motion passed unanimously.

Motion by Roberts second by Highberger to approve the following: Apprenticeship (2nd Extension). Tara Cook, Claremore, Dillon, Sand Springs; Jessica Brewer, Holdenville, Williamson-Spradlin, Wetumka. The motion passed unanimously

Motion by Roberts second by Highberger to table the following: Funeral Director and/or Embalmer (Reciprocal), Brad Pingel, Texas (FD Only). The motion passed unanimously.

Motion by Roberts second by Highberger to approve the following: Funeral Director and/or Embalmer (Original, Breanne Strawn, Piedmont, (FD Only); Deanna; Evans, Dewey (FD Only); Lily Johnson, OKC. The motion passed unanimously.

Motion by Roberts second by Highberger to approve the following: Establishments, Kirk Funeral Home, Ardmore, request to close establishment; Kirk Funeral Home, Ardmore, New Establishment, Kirk Funeral Home LLC, Ardmore, Brandon Reid, FDIC. The motion passed unanimously.

There was no new business

Agency Financial update- Mr. Stiles reported gross receipts for March 2024 to be \$6,990.00 with \$699.00 going to the State of Oklahoma general fund. The expenses for the same timeframe totaled \$33,427.07 and net income after expenses totaled -\$27,136.07.

2024 Legislative Session Bills- HB2959 this is the bill to extend the sunset of the Funeral Board for 3 years and it passed the Senate Committee and now waiting for it to be placed on the Senate Floor agenda

SB1602 - this is the funeral service merchandise bill that allows anyone to sell a casket without a license if they are not selling any other funeral services and has not been placed on the House Committee Agenda at this time.

Strategic Planning: Discussion and possible action regarding change of Board Statutes or Board Rules: Board discussion for Updating Cremation Statutes and Rules. Darin Corbett and John Davenport would like to continue discussions, build more of a framework, and is still looking at various cremation statutes and rules and compiling a list.

The Board discussed removing the supervision of apprentices after a certain time frame as long as other requirements have been met and taking the law exam prior to being allowed to be removed from personal supervision.

Matters for consideration: Executive Director. Motion by Highberger second by Dunn to enter executive session. The motion passed unanimously.

Motion by Highberger second by Roberts to exit executive session. No votes were taken and no other matters were discussed while in executive session. The motion passed unanimously.

Motion by Highberger second by Coble to adjourn the meeting at 11:46AM. 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,

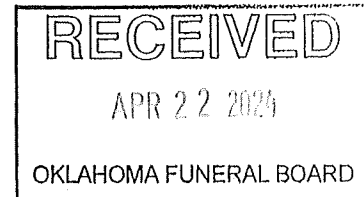
Address: 1300 North Lottie Ave
Oklahoma City, OK 73117

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

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

Complaint No. 23-16

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 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 **MAY 9, 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**

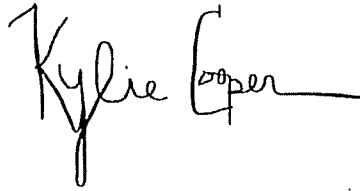
¹ When determining the amount of an administrative penalty, the Board shall consider, but not be limited to:

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 written in a cursive style with a long horizontal flourish extending to the right.

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 22nd day of Apr. /, 2024, a true and correct copy of the foregoing *Complaint and Notice of Hearing* was served either by mailing by Certified Mail or by handing to a process server for service in person as follows:

Heritage Funeral Home and Cremation Services LLC
1300 North Lottie Ave
Oklahoma City, OK 73117

Christopher Harrison
1300 North Lottie Ave
Oklahoma City, OK
73117

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

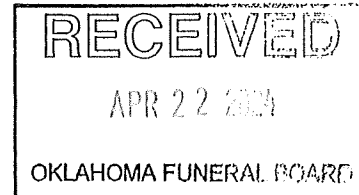
Oklahoma City, OK 73117

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

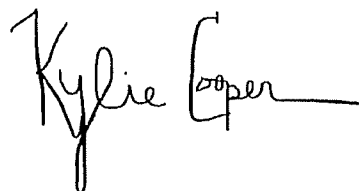
An **EVIDENTARY HEARING** will be held before the Board on **MAY 9, 2024 at 10:00 A.M.** Respondents may appear personally or through an attorney. If Respondents fail to appear, the hearing will be held in their absence. Respondents have the right to submit a written response, cross-examine witnesses, 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 written in a cursive style 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

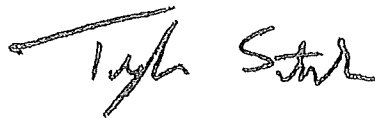
CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of April, 2024, a true and correct copy of the foregoing *Complaint and Notice of Hearing* was served either by mailing by Certified Mail or by handing to a process server for service in person as follows:

Heritage Funeral Home and Cremation Services LLC
1300 North Lottie Ave
Oklahoma City, OK 73117

Christopher Harrison
1300 North Lottie Ave
Oklahoma City, OK
73117

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,

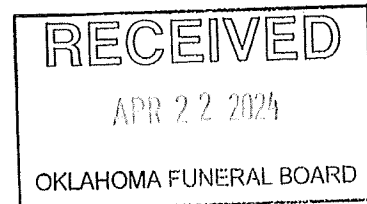
Address: 1300 North Lottie Ave
Oklahoma City, OK 73117

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. Further, Board staff alleged a violation of OAC 235:10-7-2(3), for failing to provide the services or merchandise contracted for regarding the urns that were never received.
8. 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.
9. 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.
10. 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

11. 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.
12. Further, Respondents violated O.A.C. 235:10-7-2(13) by failing to provide the services or merchandise contracted for.
13. 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.
14. 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

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 **MAY 9, 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 written in a cursive style with a long horizontal stroke at the end.

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 22nd day of April, 2024, a true and correct copy of the foregoing *Complaint and Notice of Hearing* was served either by mailing by Certified Mail or by handing to a process server for service in person as follows:

Heritage Funeral Home and Cremation Services LLC
1300 North Lottie Ave
Oklahoma City, OK 73117

Christopher Harrison
1300 North Lottie Ave
Oklahoma City, OK
73117

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

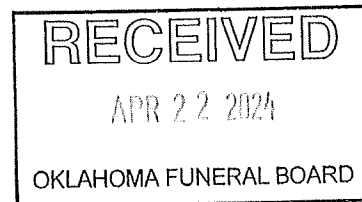
Oklahoma City, OK 73117

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

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

Respondent.

Complaint No. 24-20



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.

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

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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:

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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 22nd day of April, 2024, a true and correct copy of the foregoing *Complaint and Notice of Hearing* was served either by mailing by Certified Mail or by handing to a process server for service in person as follows:

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1300 North Lottie Ave
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1300 North Lottie Ave
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Ronald Skip Kelly
205 NW 63rd St STE 150
Oklahoma City, OK 73116
Kellyron01@yahoo.com



Tyler Stiles, MBA
Executive Director