

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. 23<sup>rd</sup> Street  
Conference Room 1<sup>st</sup> Floor Oklahoma City, OK 73105.

DATE & TIME: August 14, 2025 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 August 11, 2025 at 9:45AM. A copy of this agenda is available on the Funeral Board website at [www.oklahoma.gov/funeral](http://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](mailto: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. Swearing in and oath of office for newly appointed Board Member  
Jeremy Sparks of Moore
3. Approval of the July 10, 2025 Regular Board meeting minutes
4. Oklahoma Funeral Director's Association Update from a Representative of OKFDA, with possible discussion
5. Oklahoma Insurance Department Update from a Representative of OID, with possible discussion
6. Oklahoma Department of Health Update from a Representative of OKDH, with possible discussion
7. Review complaints with possible vote for probable cause or other action

25-14 Contract Issues

25-27 Unlicensed Practice

25-37 Unlicensed Practice

25-38 Non-Payment of Vendor

25-39 Non-Payment of Vendor

25-40 Cremated Remains Issues

25-42 Unlicensed Practice/Contract Issues

25-43 Unprofessional Staff

25-44 Contract Issues

**8. Matters for consideration: 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.

8A. Complaint 24-32, McKay-Davis Funeral Home, Inc, OKC, Beside Stillwaters, LLC, OKC, Owner, Johnnie Swanson, Jr, OKC, FDIC. Member Matherly needs to recuse.

8B. Complaint 24-40, Lewis Robinson III, Guthrie. Member Matherly needs to recuse.

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

A. Apprenticeship (Original)

1. Lorelai Rivas Silva, Warr Acres, Bill Eisenhower FH, OKC
2. Reyna Acosta, Shawnee, Walker F&CS, Shawnee
3. Rosalind Carl, OKC, Smith & Kernke FD, OKC
4. Layne Ryan, OKC, Ingram, Smith & Turner Mortuary, Yukon
5. Amanda Sparks, Edmond, Corbett F&CS, OKC
6. Brionna Gray, Norman, Advantage F&CS, OKC
7. Clay Neel, Norman, Corbett F&CS, OKC
8. Ryleigh Deaver, Tulsa, Butler-Stumpff & Dyer CS, Tulsa

B. Apprenticeship (1<sup>st</sup> Extension)

1. Morgan White, Norman, Wilson-Little FH, Purcell
2. Dan Samuel, Piedmont, McNeil's FS, Mustang (FD Only)
3. Kathleen Salas Roldan, Tulsa, Schaudt's Glenpool-Bixby FS&C, Glenpool
4. Trinady Smith, Alva, Mercer-Adams FS, Bethany

C. Apprenticeship (2<sup>nd</sup> Extension)

1. Tyler Robbins, Bartlesville, Davis Family FH, Bartlesville
2. Samuel Hild, OKC, Bill Eisenhower FH, OKC
3. RayLynn Blanton, Yukon, Memorial Park FH, OKC
4. Alexandria Nimsey, Tulsa, Butler-Stumpff & Dyer CS, Tulsa

D. Apprenticeship (4<sup>th</sup> Extension)

1. Mathew Burch, Antlers, Serenity FS, Antlers
2. Michael Frazier, Hugo, Prater-Lampton-Mills & Coffey FH, Hugo (FD Only)

E. Funeral Director Assistant (Original)

1. William Swanson, MWC, Wilson FS, El Reno
2. Cole Hart, Walters, Hart-Wyatt FH, Walters
3. Philip McGehee, Poteau, Evans & Miller FH, Poteau
4. Laci Gabbert, Sallisaw, Agent Mallory Martin FS, Sallisaw
5. Tara Turner, Blair, Kincannon FH&CS, Altus
6. Kimberly Clark, Tishomingo, DeArman-Clark FS, Tishomingo

F. Funeral Director and/or Embalmer (Reciprocal)

1. Stuart Thompson, Texas

G. Funeral Director and/or Embalmer (Original)

1. Sarah Brown, Bartlesville
2. Madelynn Holuby, Henryetta (FD Only)
3. Sherry Gray, Wilson (EM Only)
4. Chia Minn Loo, OKC
5. Jensen Hernandez, Sand Springs (FD Only)
6. Alaina Webster, Noble

H. Establishments

1. Neptune Society, Edmond, request to close establishment
2. Community FH, Guthrie, request to change FDIC from Lyndel Hamilton to Randilyn Walker

3. Affordable Cremation, OKC, request to change FDIC from Lyndel Hamilton to Randilyn Walker
4. Whinery-Huddleston FS, Lawton, request to change FDIC from Randilyn Walker to Kenneth Douglas
5. Stumpff Barnsdall FH, Barnsdall, request to close establishment
6. Reynolds-Holz Cremation & Funeral Service, Tulsa request to change name to Reynolds & AdamsCrest Funeral & Cremation Services
7. Reynolds & AdamsCrest Funeral & Cremation Services request to change FDIC from Scott Holz to Nick Reynolds

I. Crematories

1. Great Plains Cremation Service, Lawton, request to change FDIC from Randilyn Walker to Kenneth Douglas

J. Embalmer Only Program

1. Northeast Texas Community College, Mt. Pleasant, Texas

10. **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.

11. Executive Director's Report

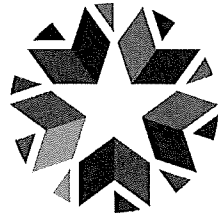
A. Agency Financial Update

12. Adjournment

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Tyler Stiles, MBA  
Executive Director

The next regular meeting of the Oklahoma Funeral Board will be held:  
September 11, 2025. Office of Chief Medical Examiner –OKC 921 N.E. 23<sup>rd</sup> Street  
Conference Room – 1<sup>st</sup> 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

July 10, 2025

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### BOARD MEMBERS

Tom Coble  
Darin Corbett  
John Davenport  
Glenn Dunn  
Brent Matherly

### STAFF

Rochelle Covington  
Tyler Stiles  
Kylie Cooper, AAG

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### MEETING PLACE: MEETING PLACE:

If attending in person at the physical location: Office of Chief Medical Examiner OKC, 921 N.E. 23<sup>rd</sup> Street Conference Room 1<sup>st</sup> 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 July 8, 2025 at 9:45AM. A copy of this agenda is available on the Funeral Board website at [www.ok.gov/funeral](http://www.ok.gov/funeral)

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

Motion by Davenport second by Coble to approve the June 12, 2025 Regular Board meeting minutes. The motion passed unanimously with member Matherly abstaining.

Dustin with OKFDA informed the Board that OKFDA is hosting tours at Lifeshare in OKC each month for 1 hour of CE. There have been great turnouts previously with 15-25 people that typically attend. The Women's Conference will be July 20-21. Fall meetings will start in September.

Rowena with OID informed the Board that name changes need to be sent to OID within 30 days, or a fine can be assessed. RIS Services has a section on the OID website where this information can be sent.

Christen with OKDH informed the Board that there have been delays in processing with the new ROVER but most of the delays have been caught up. There will be additional updates in the coming weeks. If there are any issues, please contact the Health Dept. 86% of Medical Certifiers are in the new system from the old system.

Motion by Coble second by Davenport to approve the following: Apprenticeship (Original) Alejandra Guzman, OKC, Mercer-Adams FS, Bethany; Kaci Pembroke, Enid, Brown-Cummings FH, Enid; Rachel Stuck, Edmond, Smith & Kernke FD, OKC; Regan Sager, Broken Arrow, Hayhurst FH, Broken Arrow; Donald McHugh, Edmond, Mercer Adams, Bethany. The motion passed unanimously.

Motion by Coble second by Davenport to approve the following: Apprenticeship (1st Extension). Kanisha Pankratz, Woodward, Billings FH, Woodward; Alec Richardson, Cyril, Becker-Rabon FH, Lawton; Emmaline Kuhn, Edmond, Smith & Kernke FH, OKC. The motion passed unanimously.

Motion by Coble second by Davenport to approve the following: Apprenticeship (2nd Extension). Ainsley Butterfield, Plano, TX, Hahn-Cook/Street & Draper, OKC; McKailyn Boice, Duncan, Whitt FH, Duncan; Kari Norberto, Cyril, Comanche Nation FH, Lawton. The motion passed unanimously.

Motion by Coble second by Davenport to approved the following: Funeral Director Assistant (Original), Adam Crase, Sperry, Sien-Shelton FH, Skiatook; Daniel Chamberlin, Bixby, Moore FH, Tulsa. The motion passed unanimously.

Motion by Coble second by Davenport to deny the following: Funeral Director and/or Embalmer (Reciprocal), Tucson Smith, Texas. The motion passed unanimously.

Motion by Coble second by Davenport to approve the following: Funeral Director and/or Embalmer (Reciprocal), Kenneth Douglas, Louisiana. The motion passed unanimously.

Motion by Coble second by Davenport to table the following: Funeral Director and/or Embalmer (Reciprocal), Stuart Thompson, Texas. The motion passed unanimously.

Motion by Coble second by Davenport to table the following: Funeral Director and/or Embalmer (Original), Sarah Brown, Bartlesville. The motion passed unanimously.

Motion by Coble second by Davenport to approve the following: Establishments, Brown Funeral Home & Cremations, Broken Arrow, request to change name to Brown's Funeral & Cremation Service; Brown Funeral Home & Cremations, Coweta, request to change name to Brown's Funeral & Cremation Service; McElyea & Owens Funeral Group, Shawnee, request to change FDIC from Michael McElyea to Robert Owens; Roberts and Son FH, Blackwell, request to temporarily change FDIC from James Roberts III to Michael McElyea. The motion passed unanimously.

Motion by Coble second by Davenport to approved the following: Crematories, McElyea & Owens Cremation Services, Shawnee, request to change FDIC from Michael McElyea to Robert Owens. The motion passed unanimously.

There was no new business

Agency Financial update- Mr. Stiles reported gross receipts for June 2025 to be \$14,305.00 with \$580.50 going to the State of Oklahoma general fund. The expenses for the same timeframe totaled \$37,612.12 and net income after expenses totaled -\$23,887.62

Motion by Corbett second by Coble to reelect Brent Matherly as Board President. The motion passed unanimously with member Matherly abstaining.

Motion by Corbett second by Matherly to reelect Tom Coble as Board Vice-President. The motion passed unanimously with member Coble abstaining.

Motion by Coble second by Corbett to adjourn the meeting at 10:13AM. The motion passed unanimously.

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Brent Matherly  
Oklahoma Funeral Board President



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

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

**McKAY-DAVIS FUNERAL HOME, INC**

A Licensed Funeral Establishment,  
Establishment License # 1905ES  
1616 NE 36th  
Oklahoma City, OK 73111

**owned by:**

**BESIDE STILLWATERS, LLC**

1616 36th  
Oklahoma City, OK 73111

**JOHNNIE SWANSON JR**

Licenses: 3024FD and 3408EM

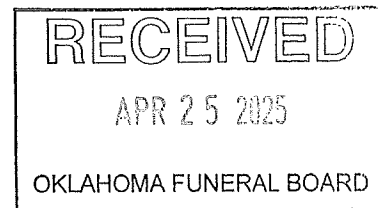
Address: 620 NE 63rd  
Oklahoma City, OK 73105

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

**McKAY-DAVIS FUNERAL HOME, INC,**

**Respondents.**

**Complaint No. 24-32**



**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 Respondents, McKAY-DAVIS FUNERAL HOME, INC, BESIDE STILLWATERS, LLC, and JOHNNIE SWANSON JR, have 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 McKAY-DAVIS FUNERAL HOME, INC (“Funeral Home”) was formally licensed by the Board, establishment license number 1905ES, and was located at 1616 NE 36th, Oklahoma City, OK 73111.

2. Respondent JOHNNIE SWANSON JR (“Funeral Director in Charge” or “FDIC”) is licensed by the Board as a funeral director and embalmer, license numbers 3024FD and 3408EM, and at all relevant times was the Funeral Director in Charge at Funeral Home.

3. Respondent BESIDE STILLWATERS, LLC (“Owner”) is, and at all relevant times was, the owner of record for Funeral Home. Upon information and belief, Respondent JOHNNIE SWANSON JR is the FDIC and registered agent for Respondent BESIDE STILLWATERS, 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 February 5, 2024, Board staff received a complaint from the Oklahoma Mortuary Service, alleging that they had not been paid within 90 days upon the funeral home receiving their vendor’s invoice.

6. On February 6, 2024, Board staff processed the complaint, alleging that Respondents had violated Board rule O.A.C. 235:10-7-2(9), by failing to discharge a financial obligation within 90 days. The Board provided Respondents with the Notice of Complaint via email on the same day.

7. On February 22, 2024, Respondents filed their response to Complaint 24-32 with the Board. Respondents stated that they do not deny the allegations, however, the establishment has ceased operations. Upon discovery of the unpaid invoice, the invoice was paid in full. Respondents did provide a receipt of this payment.

8. By public vote during the meeting on April 11, 2024, 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. 235:10-7-2(9) by failing to discharge a financial obligation within 90 days. The relevant Rule, O.A.C. 235:10-7-2(9), provides:

Failure to discharge financial obligation. Failure to pay any vendor or third-party obligation, within 90 days, that arises out of a Statement of Goods and Services that has been signed by the authorized person or failure to satisfy a judgment rendered by a court of proper jurisdiction, within 90 days or as ordered by the court, in favor of a vendor or third-party provider as designated on the Statement of Goods and Services or in connection with goods and services provided for a specific buyer.

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 JOHNNIE SWANSON JR, 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

violations<sup>1</sup>; (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 8, 2025, 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.

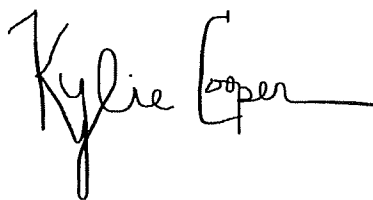
Instead of proceeding with the aforementioned hearing, the parties may present a **JOINT PROPOSED CONSENT ORDER** to the Board on the same date and time. *See* 75 O.S. § 309(E).

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<sup>1</sup> 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.

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Kylie Cooper, OBA # 23758  
Assistant Attorney General  
Office of the Oklahoma Attorney General  
313 NE 21<sup>st</sup> Street  
Oklahoma City, OK 73105  
kylie.cooper@oag.ok.gov

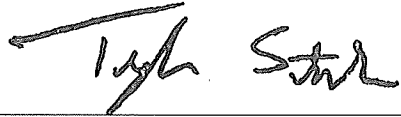
Attorney for Oklahoma Funeral Board

**CERTIFICATE OF SERVICE**

I hereby certify that on the 25<sup>th</sup> day of April, 2024, a true and correct copy of the foregoing *Complaint and Notice of Hearing* was served either mailing by Certified Mail or by handing to a process server for service in person, as follows:

**BY CERTIFIED MAIL:**

Russell S. Cochran  
620 N. Robinson Avenue, Suite 207  
Oklahoma City, OK 73102  
Russ@GaryJamesLaw.com  
*Attorney for Respondents*

A handwritten signature in black ink, appearing to read "Tyler Stiles", is written over a horizontal line.

Tyler Stiles, MBA  
Executive Director

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

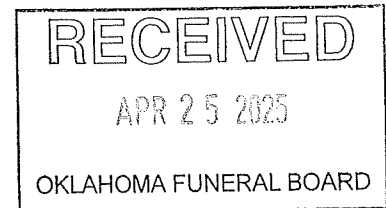
**IN THE MATTER OF THE COMPLAINT  
AGAINST:**

**LEWIS ROBINSON III**

Certificate: 6372AP  
Address: 305 South Drexel  
Guthrie, OK 73044

**Respondent.**

**Complaint No. 24-40**



**COMPLAINT AND NOTICE OF HEARING**

1. 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, LEWIS ROBINSON III, 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 LEWIS ROBINSON III ("Funeral Director in Charge" or "FDIC") is registered by the Board as an apprentice funeral director and embalmer, certificate number 6372AP.
2. 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**

3. On April 3, 2024, Board staff filed a complaint on the respondent, alleging that he had sent a text message to another licensee representing himself as an employee with a closed funeral home and representing himself as owner of another funeral home in regards to servicing a decedent. The respondent is not an owner of a licensed funeral home and is not licensed as a funeral director or embalmer.

4. On April 3, 2024, Board staff processed the complaint, alleging that Respondents had violated Board rule O.A.C. 235:10-7-2(1) and (26)(a) and (b), by providing false and misleading information.

5. On April 19, 2024, Respondents filed their response to Complaint 24-40 with the Board. Respondents stated that they identified themselves with the closed establishment for context and not to advertise as that funeral home and that the respondent is the operations manager of the other funeral homes that were mentioned in the text.

6. By public vote during the meeting on April 11, 2024, the Board found probable cause to file a formal complaint against Respondents for the violations alleged herein.

7. 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**

8. Respondents violated O.A.C. 235:10-7-2(1) by incorrectly sending a text message to another licensee representing himself as an employee with a closed funeral home and representing himself as owner of another funeral home in regards to servicing a decedent. The relevant Rule, O.A.C. 235:10-7-2(1), provides:

Material misrepresentation. Material misrepresentation to the public of facts, requirements of Oklahoma Statutes, State Board Rules, or any rule or regulation pertaining directly to



the custody, care, or disposal of dead human remains. Material misrepresentation is also construed to include a person knowingly and willfully signing a certificate as having embalmed, cremated, or prepared a dead human body for disposition when, in fact, the services were not performed as indicated. A material misrepresentation also includes misrepresentation to the Board of completion of continuing education requirements when the requirements were not met.

9. Respondents violated O.A.C. 235:10-7-2(26)(a) and (b) by stating misleading information.

The relevant Rule, O.A.C. 235:10-7-2(26)(a) and (b), provides:

(a) The licensee shall be knowledgeable of and comply with all federal and state laws, rules, and codes applicable to the Funeral Service industry. It is the obligation of the licensee to exercise reasonable judgment and skill in the performance of all duties and work performed as a licensee and to not as determined by the Board perform his or her duties in a negligent or incompetent manner. The licensee must perform his or her duties with honesty, integrity, and in a trustworthy manner.

(b) Integrity.

(i) A licensee shall be honest and trustworthy in the performance of all duties and work performed as a licensee and shall avoid misrepresentation and deceit in any fashion, whether by acts of commission or omission

10. 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**

11. 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

violations<sup>1</sup>; (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.

12. 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.*

13. 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 8, 2025, 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).

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<sup>1</sup> 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 horizontal line extending from the end of the name.

---

Kylie Cooper, OBA # 23758  
Assistant Attorney General  
Office of the Oklahoma Attorney General  
313 NE 21<sup>st</sup> Street  
Oklahoma City, OK 73105  
kylie.cooper@oag.ok.gov

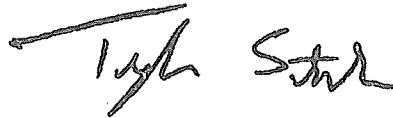
Attorney for Oklahoma Funeral Board

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2<sup>nd</sup> day of April, 2025, a true and correct copy of the foregoing *Complaint and Notice of Hearing* was served either mailing by Certified Mail or by handing to a process server for service in person, as follows:

**BY CERTIFIED MAIL:**

Russell S. Cochran  
620 N. Robinson Avenue, Suite 207  
Oklahoma City, OK 73102  
Russ@GaryJamesLaw.com  
*Attorney for Respondents*

A handwritten signature in black ink, appearing to read "Tyler Stiles", is written above a horizontal line.

Tyler Stiles, MBA  
Executive Director