

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: November 13, 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 November 10, 2025 at 12:30PM. 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 October 9, 2025 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. Oklahoma Department of Health Update from a Representative of OKDH, with possible discussion
6. Matters for consideration: Consent Order, Scheduling Order, or Hearing

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 24-16, Brown-Winters Funeral Home & Cremation Services, Miami, Family Service Group, Okmulgee, Owner, Jeffery Brown, Miami, FDIC. Member Matherly needs to recuse.

6B. Complaint 25-34, Brown-Winters Funeral Home & Cremation Services, Miami, Family Service Group, Okmulgee, Owner, Jeffery Brown, Miami, FDIC, Tyler Johnson, Funeral Director, Commerce. Member Matherly needs to recuse.

6C. Complaint 23-16, Heritage Funeral Home and Cremation Services, LLC, Christopher Harrison, Funeral Director and Embalmer, OKC. Member Matherly needs to recuse.

6D. Complaint 25-05, Central Oklahoma Heritage Funeral Directors LLC, OKC, Central Oklahoma Heritage Funeral Directors LLC, Owner, Kristi Harrison, OKC, FDIC. Member Matherly needs to recuse.

6E. Complaint 25-14, Central Oklahoma Heritage Funeral Directors LLC, OKC, Central Oklahoma Heritage Funeral Directors LLC, Owner, Kristi Harrison, OKC, FDIC. Member Matherly needs to recuse.

6F. Complaint 25-17, Central Oklahoma Heritage Funeral Directors LLC, OKC, Central Oklahoma Heritage Funeral Directors LLC, Owner, Kristi Harrison, OKC, FDIC. Member Matherly 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. Parker Brewer, Piedmont
2. Shelby Morgan, Piedmont, Sanders FS, Kingfisher
3. Jade Chase, Edmond, Smith & Kernke FD, OKC
4. Kylar Graham, OKC, Crawford Family F&CS, OKC
5. Tessa Hooper, Edmond, John M. Ireland & Son FH&C, Moore
6. Bryn Early, Yukon, Ingram, Smith & Turner Mortuary, Yukon

B. Apprenticeship (1st Extension)

1. Amy Adams, Edmond, Matthew's FH&CS, Edmond
2. Alaina Stegall, Edmond, Matthew's FH&CS, Edmond
3. Kaci Pembroke, Enid, Brown-Cummings FH, Enid
4. Autumn Green, Mustang, OMS- OKC
5. Sabrina King, Jenks, Smith FH, Sapulpa
6. Nicole Haynie, Tulsa, Floral Haven FH, Broken Arrow
7. Erika DuPree, Lawton, Lawton Ritter Gray FH, Lawton

C. Apprenticeship (2nd Extension)

1. Charles Grisham, Henryetta, Integrity FS, Henryetta

D. Funeral Director Assistant (Original)

1. Jenna Beckwith, Sawyer, Miller & Miller FH, Hugo
2. Andrew Horton, Stigler, Mallory-Martin FH, Stigler
3. Kevin Clouse, Cushing, Matherly-Davis FH, Cushing

4. LaTonya McGee, OKC, OK Cremation & FH, OKC
5. Haley Sitton, Hominy, Chapman-Black FH, Cleveland
6. Christopher Petroff, Elgin, Becker-Rabon FH, Lawton
7. Kye Peterson, Edmond, Baggerley FH, Edmond

E. Funeral Director and/or Embalmer (Reciprocal)

1. Teresa Givan, Texas

F. Funeral Director and/or Embalmer (Original)

1. Madelynn Holuby, Henryetta (FD Only)
2. Holland Dugdale, Okmulgee (FD Only)
3. RayLynn Blanton, Yukon
4. Trinady Smith, Alva
5. Kari Norberto, Cyril
6. Quade Varner, OKC (FD Only)
7. Laci Duffy, Enid (FD Only)
8. Jeremy Fairres, Okemah

G. Establishments

1. Resthaven FH, OKC, request to change FDIC from Michael Kelly to Shelby Wallis
2. Moore's Memory Chapel, Tulsa, request to close
3. Simplicity Burial & OK Cremation Centers, Tulsa, request to change FDIC from Jason Mayes to Christopher Powers
4. Simplicity Burial & OK Cremation Centers, Glenpool, request to change FDIC from Jason Mayes to Christopher Powers
5. Kincannon FH, Altus, request to change FDIC from Thomas Durman to Perry-Michelle Simpson

6. Primrose Funeral Service, Norman, new establishment, SCI Oklahoma Funeral Services, Inc., Owner, Roger Allen, FDIC
7. DeArman Funeral Home, Sulphur, new establishment, DeArman Properties, Inc., Owner, Joe DeArman, FDIC
8. Our Lady of Angels, OKC, request to change FDIC from Sarah Blank to Rubith Lujan

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.

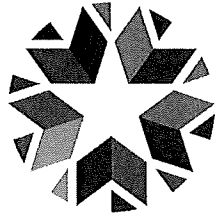
9. Executive Director's Report

- A. 2026 Licensee Renewals
- B. Agency Financial Update

10. Adjournment

Tyler Stiles, MBA
Executive Director

The next regular meeting of the Oklahoma Funeral Board will be held: December 11, 2025. 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

October 9, 2025

BOARD MEMBERS

Tom Coble
Darin Corbett
John Davenport
Brent Matherly
Jeremy Sparks
Bart Watkins

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 October 7, 2025 at 9:00AM. A copy of this agenda is available on the Funeral Board website at www.ok.gov/funeral

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

Motion by Watkins second by Sparks to approve the September 11, 2025 Regular Board meeting minutes. The motion passed unanimously with member Coble abstaining.

Dustin with OKFDA informed the Board Celebrant training will be held in November. The State exams will be available starting November 1. Last call CE will be December 7-8 at Barnes Friederich FH in Midwest City for 6 hours.

Rowena Ehrman with OID informed the Board that permits are due December 31 and you are able to send them up to 90 days prior. For any questions, call OID.

Ameyka Pittman with OKDH informed the Board that the Health Dept emails weekly communications, if you do not receive those or if you are having issues with doctors, please contact them.

Motion by Davenport second by Matherly to find probable cause on complaint 26-01 regarding Death Certificate Issues. The motion passed unanimously.

Motion by Watkins second by Coble to dismiss complaint 26-02 regarding Death Certificate Issues. The motion passed unanimously.

Motion by Sparks second by Dunn to dismiss complaint 26-03 regarding Overcharging issues. The motion passed unanimously.

Motion by Watkins second by Sparks to find probable cause on complaint 26-04 regarding Cremation issues. The motion passed unanimously.

Motion by Sparks second by Coble to dismiss complaint 26-06 regarding Cremation/Overcharging issues. The motion passed unanimously.

Regarding the matters for consideration: Order of Dismissal: Complaint 25-06, Brown's Funeral Service, Inc, Coalgate, Brown's Funeral Service, Inc, Atoka, Owner, William Stephens, Atoka, FDIC. The prosecution was represented by Kylie Cooper, AAG. Liz Stevens, AAG, was the Board's legal advisor. Members Coble, Davenport, Dunn, Sparks, and Watkins heard the case. Member Matherly was recused from the case and he left the room.

After the presentation of the proposed Order to Dismiss, motion by Davenport second by Sparks to enter executive session. The motion passed unanimously.

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

Motion by Davenport second by Coble to accept the Dismissal. The motion failed unanimously.

Regarding the matters for consideration: Consent Order, Scheduling Order, or Hearing: Complaint 24-16, Brown-Winters Funeral Home & Cremation Services, Miami, Family Service Group, Okmulgee, Owner, Jeffery Brown, Miami, FDIC.; Complaint 25-34, Brown-Winters Funeral Home & Cremation Services, Miami, Family Service Group, Okmulgee, Owner, Jeffery Brown, Miami, FDIC, Tyler Johnson, Funeral Director, Commerce.; Complaint 23-16, Heritage Funeral Home and Cremation Services, LLC, Christopher Harrison, Funeral Director and Embalmer, OKC.; Complaint 25-05, Central Oklahoma Heritage Funeral Directors LLC, OKC, Central Oklahoma Heritage Funeral Directors LLC, Owner, Kristi Harrison, OKC, FDIC.; Complaint 25-14, Central Oklahoma Heritage Funeral Directors LLC, OKC, Central Oklahoma Heritage Funeral Directors LLC, Owner, Kristi Harrison, OKC, FDIC.; Complaint 25-17, Central Oklahoma Heritage Funeral Directors LLC, OKC, Central Oklahoma Heritage Funeral Directors LLC, Owner, Kristi Harrison, OKC, FDIC. The prosecution was represented by Kylie Cooper, AAG. Liz Stevens, AAG, was the Board's legal advisor. Members Coble, Davenport, Dunn, Sparks, and Watkins heard the case. Member Matherly was recused from the case and he was already out of the room. Motion by Sparks second by Davenport to table all of these. The motion passed unanimously.

Member Matherly reentered the room.

Motion by Coble second by Sparks to approve the following: Apprenticeship (Original) Stephanie Winston, OKC, Temple & Sons FD, OKC (FD Only); Diandra Delso, Broken Arrow, Hayhurst FH, Broken Arrow; Linda Dunbar, Lawton, Lawton Ritter Gray FH, Lawton. The motion passed unanimously.

Motion by Coble second by Davenport to table the following: Apprenticeship (Original) Parker Brewer, Piedmont. The motion passed unanimously.

Motion by Coble second by Davenport to table the following: Apprenticeship (1st Extension). Amy Adams, Edmond, Matthew's FH&CS, Edmond. The motion passed unanimously.

Motion by Coble second by Davenport to approve the following: Apprenticeship (1st Extension). Jessica Martin, Hobart, Peoples Cooperative FH, Lone Wolf; Gabriella Hudspeth, Yukon, Ingram, Smith & Turner Mortuary, Yukon; Hailey Fahey, MWC, Smith-Parks Bros. FS, Harrah; Amber Howard, Claremore, Ray Fransisco Embalming Service, Tulsa; Glenn Kias Palmer-Roberts, Guthrie, Bill Eisenhour FH, OKC (EM Only). The motion passed unanimously.

Motion by Coble second by Davenport to table the following: Apprenticeship (2nd Extension). Charles Grisham, Henryetta, Integrity FS, Henryetta. The motion passed unanimously.

Motion by Coble second by Davenport to approve the following: Apprenticeship (2nd Extension). Ariana Stevens-Mujica, OKC, Bill Eisenhour FH, OKC. The motion passed unanimously.

Motion by Coble second by Sparks to approve the following: Funeral Director Assistant (Original), Philip McGehee, Poteau, Evans & Miller FH, Poteau. The motion passed unanimously.

Motion by Coble second by Davenport to table the following: Funeral Director Assistant (Original), Jenna Beckwith, Sawyer, Miller & Miller FH, Hugo. The motion passed unanimously.

Motion by Coble second by Davenport to deny 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), Madelynn Holuby, Henryetta (FD Only); Holland Dugdale, Okmulgee (FD Only); RayLynn Blanton, Yukon. The motion passed unanimously.

Motion by Coble second by Davenport to deny the following: Funeral Director and/or Embalmer (Original), Chia Minn Loo, OKC. The motion passed unanimously.

Motion by Coble second by Davenport to approve the following: Funeral Director and/or Embalmer (Original), Lauren Sloan, Sapulpa (FD Only); Brittany Yeager, Weatherford. The motion passed unanimously.

Motion by Coble second by Davenport to approve the following: Establishments, Smart Cremation of Oklahoma, Tulsa, New Establishment, Smart Cremation of Oklahoma LLC, Walter Still, FDIC; Dowden-Roberts Cremation Center, Poteau, request to change name to Dowden-Roberts Funeral & Cremation Center. The motion passed unanimously.

There was no new business

Motion by Watkins second by Sparks to approve the proposed Board meeting schedule for 2026 and approve those meetings for CE. The meetings will be the second Thursday of each month. The motion passed unanimously.

Agency Financial update- Mr. Stiles reported gross receipts for September 2025 to be \$4,612.50 with \$461.25 going to the State of Oklahoma general fund. The expenses for the same timeframe totaled \$42,866.74 and net income after expenses totaled -\$38,715.49

Motion by Coble second by Sparks to adjourn the meeting at 11:12AM. The motion passed unanimously.

Brent Matherly
Oklahoma Funeral Board President

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

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

**BROWN-WINTERS FUNERAL HOME &
CREMATION SERVICES**

A Licensed Funeral Establishment,
Establishment License # 1747ES
5 B Street NW
Miami, OK 74354

owned by:
FAMILY SERVICE GROUP, LLC
17185 Hess Road
Okmulgee, OK 74447

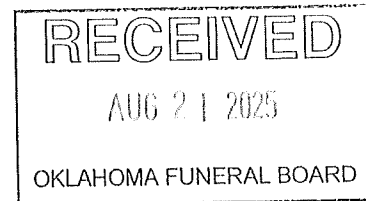
JEFFERY BROWN

Licenses: 2872FD and 3255EM,
Address: 5 B Street NW
Miami, OK 74354

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

**BROWN-WINTERS FUNERAL HOME &
CREMATION SERV**

Complaint No. 24-16



Respondents.

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, BROWN-WINTERS FUNERAL HOME & CREMATION SERVICE, FAMILY SERVICE GROUP, LLC, and JEFFERY BROWN, 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 BROWN-WINTERS FUNERAL HOME & CREMATION SERVICES (“Funeral Home”) is licensed by the Board, establishment license number 1747ES, and is located at 5 B Street, Miami, OK 74354.

2. Respondent JEFFERY BROWN (“Funeral Director in Charge” or “FDIC”) is licensed by the Board as a funeral director and embalmer, license numbers 2872FD and 3255EM, and at all relevant times was the Funeral Director in Charge at Funeral Home and registered agent for Respondent BROWN-WINTERS FUNERAL HOME & CREMATION SERVICES.

3. 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

4. On or about October 9, 2023, Board staff received a complaint from Joshua Taylor. Mr. Taylor’s late daughter passed away on October 6, 2021. Mr. Taylor’s daughter was not cremated until approximately 21 days later.

5. Further, the complaint alleged that Respondents had failed to file a death certificate, cremation permit, disinterment permit or any other necessary permit as required by law in a timely manner, in violation of OAC 235: 10-7-2(14). The Board provided Respondents with the Notice of Complaint via certified mail, and it was delivered on October 10, 2023.

6. On October 13, 2023, Respondents filed their response to Complaint 24-16 with the Board. Respondents state that the funeral home needed a driver’s license with the correct spelling of the

decedent, as the spelling they were provided was not correct and correcting the spelling uncertified the death certificate.

7. Vital Records system, ROVER, shows that the case for Mr. Taylor's daughter was started October 19, 2021, 13 days after the death occurred.

8. By public vote during the meeting on September 12, 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 OAC 235: 10-7-2(14) by failing to file necessary permits as required by law in a timely fashion. The relevant Board rule, 235: 10-7-2(14), provides:

Failure 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 JEFFERY BROWN 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 **SEPTEMBER 11, 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).

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
kylie.cooper@oag.ok.gov

Attorney for Oklahoma Funeral Board

CERTIFICATE OF SERVICE

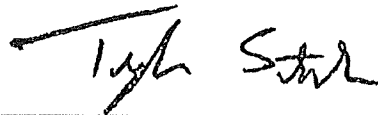
I hereby certify that on the 21st day of August, 2025, a true and correct copy of the foregoing *Complaint and Notice of Hearing* was served either mailing by Certified Mail or by handing to a process server for service in person, as follows:

BY CERTIFIED MAIL:

BROWN-WINTERS FUNERAL HOME & CREMATION SERV
5 B Street
Miami, OK 74354

FAMILY SERVICE GROUP, LLC
17185 Hess Road
Okmulgee, OK 74447

JEFFERY BROWN
5 B Street
Miami, OK 74354



Tyler Stiles, MBA
Executive Director

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

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

**BROWN-WINTERS FUNERAL HOME &
CREMATION SERVICES**

A Licensed Funeral Establishment,
Establishment License # 1747ES
5 "B" Street NW
Miami, OK 74354

BROWN-WINTERS CREMATORY

A Licensed Crematory License # 86CM
5 "B" Street NW
Miami, OK 74354

owned by:

FAMILY SERVICE GROUP, LLC

17185 Hess Road
Okmulgee, Oklahoma 74447

TYLER JOHNSON

License: 3708FD
Address: 221 L. Street
Commerce, OK 74339

JEFFERY BROWN

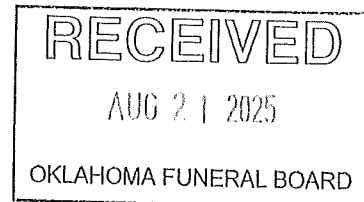
Licenses: 2872FD and 3255EM,
Address: 5 "B" Street NW
Miami, OK 74354

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

**BROWN-WINTERS FUNERAL HOME &
CREMATION SERVICES,**

Respondents.

Complaint No. 25-34



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, BROWN-WINTERS FUNERAL HOME & CREMATION SERVICES, BROWN-WINTERS CREMATORY, FAMILY SERVICE GROUP, LLC, TYLER JOHNSON, and JEFFERY BROWN, 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 BROWN-WINTERS FUNERAL HOME & CREMATION SERVICES (“Funeral Home”) is licensed by the Board, establishment license number 177ES, and is located at 5 “B” Street NW, Miami, OK 74354.
2. Respondent TYLER JOHNSON is licensed by the Board as a funeral director, license number 3708FD, and was responsible for the cremation at issue.
3. Respondent JEFFERY BROWN (“Funeral Director in Charge” or “FDIC”) is licensed by the Board as a funeral director and embalmer, license numbers 2872FD and 3255EM, and at all relevant times was the Funeral Director in Charge at Funeral Home.
4. Respondent FAMILY SERVICE GROUP, LLC (“Owner”) is, and at all relevant times was, the owner of record for Funeral Home. Upon information and belief, Respondent JEFFERY BROWN is the owner and registered agent for Respondent FAMILY SERVICE GROUP, LLC.
5. 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

6. On or about April 2, 2025, Board staff received a complaint from the Oklahoma Office of the Medical Examiner, alleging that Brown-Winters Funeral Home cremated a decedent, Maureen Brooks, before a permit application was approved for the cremation.

7. On April 2, 2025, Board staff processed the complaint, alleging that Respondents had violated Board rule O.A.C. 235:10-7-2(10) which states,

“Desecration. Damage, abuse, desecration or the unauthorized removal of tissue, bones, or organs of any human remains in the custody of a licensed funeral establishment, commercial embalming establishment, crematory, funeral director, embalmer or apprentice. Desecration shall not include the removal of blood, body fluids, body tissue, or other body parts in the normal course of embalming or restoration requested by authorizing agent. Desecration also includes the simultaneous cremation of more than one human dead body without express written approval of the authorizing agent, **cremating human remains without the permit required by 63 O.S. §1-329** or cremating dead human remains without express written approval of the authorizing agent.” (emphasis added)

The Board provided Respondents with the Notice of Complaint via certified mail, which was delivered on April 14, 2025.

8. Further, Board staff alleged that Respondents had violated 59 O.S. §396.33 which states, “Disposing of the body of a deceased person by cremation or other similar means, within the State of Oklahoma, except in a crematory duly licensed as provided for in Section 25 of this act and under a special permit for cremation issued in accordance with the provisions of Section 1-329.1 of Title 63 of the Oklahoma Statutes, is hereby declared to be a felony.”

9. On April 14, 2025, Respondents filed their response to Complaint 25-34 with the Board. Respondents acknowledged the cremation without a permit and indicated that they investigated how such a mistake could occur and have reviewed their internal policies and procedures.

10. By public vote during the meeting on May 8, 2025, the Board found probable cause to file

a formal complaint against Respondents for the violations alleged herein.

11. 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

12. Respondents Brown-Winters Funeral Home & Cremation Services, Tyler Johnson, and Brown-Winters Crematory violated O.A.C. 235:10-7-2(10) by cremating decedent Maureen Brooks before the Medical Examiner's Office authorized the cremation and signed the cremation permit. The relevant Rule, O.A.C. 235:10-7-2(10), provides,

“Desecration. Damage, abuse, desecration or the unauthorized removal of tissue, bones, or organs of any human remains in the custody of a licensed funeral establishment, commercial embalming establishment, crematory, funeral director, embalmer or apprentice. Desecration shall not include the removal of blood, body fluids, body tissue, or other body parts in the normal course of embalming or restoration requested by authorizing agent. Desecration also includes the simultaneous cremation of more than one human dead body without express written approval of the authorizing agent, **cremating human remains without the permit required by 63 O.S. §1-329** or cremating dead human remains without express written approval of the authorizing agent.” (emphasis added)

13. Further, Respondents Brown-Winters Funeral Home & Cremation Services, Tyler Johnson, and Brown-Winters Crematory violated 59 O.S. §396.33 by disposing of a body without the proper cremation permit.

14. 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 JEFFERY BROWN, as the Funeral Director in Charge of the Funeral Home is also liable for the above violations.

15. 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

16. 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.

17. 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.*

18. 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 **September 11, 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

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.

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).

Respectfully submitted:

A handwritten signature in black ink that reads "Kylie Cooper". The signature is fluid and cursive, with the first name "Kylie" and the last name "Cooper" clearly distinguishable.

Kylie Cooper, OBA # 23758
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 21st day of August, 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:

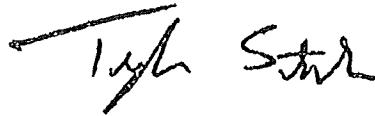
Brown-Winters Funeral Home &
Cremation Services
5 "B" Street NW
Miami, Ok 74354

Jeffery Brown
5 "B" Street NW
Miami, OK 74354

Brown-Winters Crematory
5 "B" Street NW
Miami, OK 74354

Family Service Group, LLC
17185 Hess Road
Okmulgee, OK 74447

Tyler Johnson
221 L. Street
Commerce, OK 74339



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,

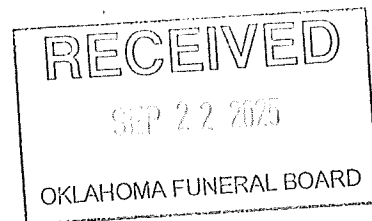
Address: 1300 North Lottie Ave
Oklahoma City, OK 73117

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

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

Respondent.

Complaint No. 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 **OCTOBER 9, 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**

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.

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 the first name "Kylie" and the last name "Cooper" clearly distinguishable.

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

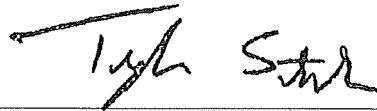
CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of September, 2025, 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:**

**CENTRAL OKLAHOMA HERITAGE
FUNERAL DIRECTORS LLC**

License: 2049ES
Address: 1300 North Lottie Ave
Oklahoma City, OK 73117

Owned by:

**CENTRAL OKLAHOMA HERITAGE
FUNERAL DIRECTORS LLC**

1300 North Lottie Ave
Oklahoma City, OK 73117

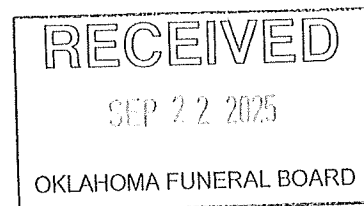
KRISTI HARRISON

Licenses: 2953FD and 3333EM,
Address: 1300 North Lottie Ave
Oklahoma City, OK 73117

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

**CENTRAL OKLAHOMA HERITAGE
FUNERAL DIRECTORS LLC**

Complaint No. 25-05



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, KRISTI 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 CENTRAL OKLAHOMA HERITAGE FUNERAL DIRECTORS LLC (“Funeral Home”) is formerly licensed by the Board, establishment license number 2049ES, and is located at 1300 North Lottie Avenue, Oklahoma City, OK 73117.

2. Respondent KRISTI HARRISON (“Funeral Director in Charge” or “FDIC”) is licensed by the Board as a funeral director and embalmer, license numbers 2953FD and 3333EM, and at all relevant times was the Funeral Director in Charge at Funeral Home.

3. Respondent CENTRAL OKLAHOMA HERITAGE FUNERAL DIRECTORS LLC (“Owner”) is, and at all relevant times was, the owner of record for Funeral Home. Upon information and belief, Respondent KRISTI HARRISON is the owner and registered agent for Respondent CENTRAL OKLAHOMA HERITAGE FUNERAL DIRECTORS 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 8, 2024, Board staff received a complaint from a consumer regarding the cremation of her father, Tommie Lee Mathis. During the course of the investigation, Board staff

found that Respondent's General Price List did not match prices charged on the consumer's Statement of Goods and Services Selected.

6. The Board provided Respondents with the Notice of Complaint via electronic mail, which was e-mailed on the date the complaint was filed.

7. On August 16, 2024, Respondents filed their response to Complaint 25-05 with the Board. Respondents state that they do not price match, but did give the consumer in this matter a discount. By public vote during the meeting on September 12, 2024, the Board found probable cause to file a formal complaint against Respondents for the violations alleged herein.

8. 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

9. Respondents violated 59 O.S. §396.12c(14) by failing to comply with the funeral rules of the Federal Trade Commission, 15 U.S.C., Section 57a(a).

10. 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 KRISTI HARRISON, as the Funeral Director in Charge of the Funeral Home is also liable for the above violations.

11. 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

12. 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.

13. 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.*

14. 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 **OCTOBER 9, 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**

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 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

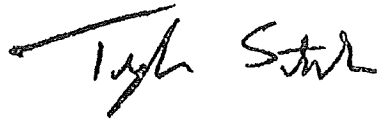
CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of September, 2025, 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:

Central Oklahoma Heritage Funeral Directors LLC
1300 North Lottie Ave
Oklahoma City, OK 73117

Kristi 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:**

**CENTRAL OKLAHOMA HERITAGE
FUNERAL DIRECTORS LLC**

License: 2049ES
Address: 1300 North Lottie Ave
Oklahoma City, OK 73117

Owned by:

**CENTRAL OKLAHOMA HERITAGE
FUNERAL DIRECTORS LLC**

1300 North Lottie Ave
Oklahoma City, OK 73117

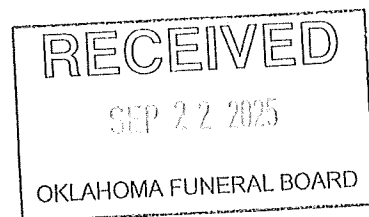
KRISTI HARRISON

Licenses: 2953FD and 3333EM,
Address: 1300 North Lottie Ave
Oklahoma City, OK 73117
A Licensed Funeral Director and Embalmer
and the Funeral Director in Charge at

**CENTRAL OKLAHOMA HERITAGE
FUNERAL DIRECTORS LLC**

Complaint No. 25-14

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, KRISTI 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 CENTRAL OKLAHOMA HERITAGE FUNERAL DIRECTORS LLC (“Funeral Home”) is licensed by the Board, establishment license number 2049ES, and is located at 1300 North Lottie Avenue, Oklahoma City, OK 73117.
2. Respondent KRISTI HARRISON (“Funeral Director in Charge” or “FDIC”) is licensed by the Board as a funeral director and embalmer, license numbers 2953FD and 3333EM, and at all relevant times was the Funeral Director in Charge at Funeral Home.
3. Respondent CENTRAL OKLAHOMA HERITAGE FUNERAL DIRECTORS LLC (“Owner”) is, and at all relevant times was, the owner of record for Funeral Home. Upon information and belief, Respondent KRISTI HARRISON is the owner and registered agent for Respondent CENTRAL OKLAHOMA HERITAGE FUNERAL DIRECTORS 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 30, 2024, Board staff received a complaint from a consumer regarding the death of his brother, Johnny Depp Jr. During the course of the investigation, Board staff found that the Respondent had not opened the Death Certificate in Rover until 16 days after the decedent

had passed.

6. The Board provided Respondents with the Notice of Complaint via electronic mail, which was e-mailed on the date the complaint was filed.

7. On November 20, 2024, Respondents filed their response to Complaint 25-14 with the Board. By public vote during the meeting on August 14, 2025, the Board found probable cause to file a formal complaint against Respondents for the violations alleged herein.

8. 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

9. Respondents violated OAC 235: 10-7-2(14) by failing to file a death certificate as required by law in a timely manner.

10. 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 KRISTI HARRISON, as the Funeral Director in Charge of the Funeral Home is also liable for the above violations.

11. 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

12. 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.

13. 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.*

14. 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 **OCTOBER 9, 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**

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 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

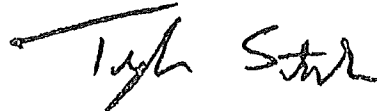
CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of September, 2025, 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:

Central Oklahoma Heritage Funeral Directors LLC
1300 North Lottie Ave
Oklahoma City, OK 73117

Kristi 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:**

**CENTRAL OKLAHOMA HERITAGE
FUNERAL DIRECTORS LLC**

Licenses: 2049ES
Address: 1300 North Lottie Ave
Oklahoma City, OK 73117

Owned by:

**CENTRAL OKLAHOMA HERITAGE
FUNERAL DIRECTORS LLC**

1300 North Lottie Ave
Oklahoma City, OK 73117

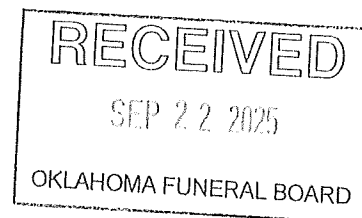
KRISTI HARRISON

Licenses: 2953FD and 3333EM,
Address: 1300 North Lottie Ave
Oklahoma City, OK 73117

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

**CENTRAL OKLAHOMA HERITAGE
FUNERAL DIRECTORS LLC**

Complaint No. 25-17



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, KRISTI 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 CENTRAL OKLAHOMA HERITAGE FUNERAL DIRECTORS LLC (“Funeral Home”) is licensed by the Board, establishment license number 2049ES, and is located at 1300 North Lottie Avenue, Oklahoma City, OK 73117.
2. Respondent KRISTI HARRISON (“Funeral Director in Charge” or “FDIC”) is licensed by the Board as a funeral director and embalmer, license numbers 2953FD and 3333EM, and at all relevant times was the Funeral Director in Charge at Funeral Home.
3. Respondent CENTRAL OKLAHOMA HERITAGE FUNERAL DIRECTORS LLC (“Owner”) is, and at all relevant times was, the owner of record for Funeral Home. Upon information and belief, Respondent KRISTI HARRISON is the owner and registered agent for Respondent CENTRAL OKLAHOMA HERITAGE FUNERAL DIRECTORS 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 October 17, 2024, Board staff received a complaint from a consumer regarding the death of her father, Otis Dean Smith. During the course of the investigation, Board staff found that Respondent failed to sign the necessary documents required for the death certificate to be timely finalized. The date of death occurred on July 10, 2024 and the death certificate was not finalized by the funeral home until October 3, 2024.
6. The Board provided Respondents with the Notice of Complaint via electronic mail, which was e-mailed on the date the complaint was filed.
7. On November 20, 2024, Respondents filed their response to Complaint 25-17 with the

Board. By public vote during the meeting on December 12, 2024, the Board found probable cause to file a formal complaint against Respondents for the violations alleged herein.

8. 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

9. Respondents violated OAC 235: 10-7-2(14) by failing to file a death certificate as required by law in a timely manner.

10. 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 KRISTI HARRISON, as the Funeral Director in Charge of the Funeral Home is also liable for the above violations.

11. 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

12. 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.

13. 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.

14. 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 **OCTOBER 9, 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**

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:



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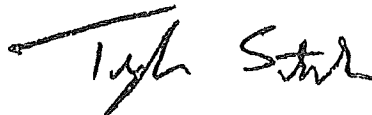
CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of September, 2025, 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:

Central Oklahoma Heritage Funeral Directors LLC
1300 North Lottie Ave
Oklahoma City, OK 73117

Kristi Harrison
1300 North Lottie Ave
Oklahoma City, OK 73117

Ronald Skip Kelly
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Tyler Stiles, MBA
Executive Director