

**IN AND BEFORE THE OKLAHOMA STATE BOARD OF DENTISTRY
STATE OF OKLAHOMA**

**STATE OF OKLAHOMA, ex rel.,
THE OKLAHOMA BOARD OF DENTISTRY,
Plaintiff**

vs.

CHELSEI HOLLINSWORTH, DA Permit #1301
Respondent

Case No: 19-130

STATEMENT OF COMPLAINT

YOU ARE HEREBY NOTIFIED on the following charges made against you.

GENERAL BACKGROUND

1. The Board has jurisdiction over the Defendant the subject matter herein pursuant to the Oklahoma State Dental Act 59 O.S. § 328.1 et. seq. and the Board of Dentistry Rules and Regulations, Title 195 et. seq.
2. **CHELSI HOLLINSWORTH DENTAL ASSISTANT PERMIT #1301** is permitted to as a dental assistant in the State of Oklahoma. Hollinsworth's permit is currently in full force. The actions relevant to the Statement of Complaint occurred in and around Oklahoma City, Cleveland County, Oklahoma.
3. The acts and omissions, which constitute the allegations contained in the Statement of Complaint, occurred during the period from January 1, 2019 through November 26, 2019 but at all times relevant to the State Dental Act and Oklahoma State laws. The requirements of the State Dental Act and the Rules and Regulations of the Board to regulate the conduct herein were in effect for all times appropriate to the actions described in the Statement of Complaint.

SPECIFIC ALLEGATIONS

Each of the paragraphs, as stated above, are incorporated and adopted by reference herein for each specific allegation.

1. A complaint was received on or about November 25, 2019 regarding a dental assistant that had been working without a valid license for approximately 1 year. Dr. Howl assigned Dr. James Gore and Dr. Krista Jones to the investigative panel.
2. This investigation included one dental assistant, Chelsi Hollinsworth, and one dentist, Dr. Rachelle Beebe.
3. On November 25, 2019, Chelsi Hollinsworth (OK DA Permit #1301) called Board staff to advise she was unable to renew her dental assistant permit for 2020. Hollinsworth further advised that when attempting to do so she realized that she had not renewed her permit for 2019. Hollinsworth advised she had been working for Dr. Rachelle Beebe.
4. On November 26, 2019, Investigator Puckett contacted the office staff at Moore Dentistry & Braces, 1530 SW 119th OKC, OK and made contact with Dr. Beebe. Dr. Beebe advised she was unaware that Hollinsworth's dental assistant permit was expired and that she would not allow Hollinsworth to work in the back until her permit was current. Dr. Beebe was apologetic for the mistake advising she tried her best to follow all of the rules/laws.
5. Inv. Puckett asked Dr. Beebe how many hygienists she employed or if she had any other dental assistants and Dr. Beebe advised she had one other dental assistant and two hygienists adding one of the hygienists had just started and only worked one day a week. Dr. Beebe took Investigator Puckett to an area in the rear of the clinic where the permits were displayed. The permit being displayed for Hollinsworth had expired December 31, 2018. All of the other dental assistants had their permits and Hollinsworth's was the only one that was missing. Chelsi Hollinsworth sent an email to investigator Puckett stating that she would not work anywhere except the front desk until she had her permit updated.
6. Chelsi Hollinsworth renewed her dental assistant permit with the Oklahoma State Board of Dentistry on December 3rd including the late fees owed by Hollinsworth for 2019 and her renewal for 2020.
7. The Respondent has taken full responsibility for her actions and has fully cooperated with investigators.

The above acts and omissions set forth above constitutes violations of the State Dental Act including violations of State and Federal laws.

Ct I - WORKING AN UNLICENSED PERSON TO WORK AS A DENTAL ASSISTANT IN VIOLATION OF 59 O.S §328.32 (A)(24) Specifically for allowing Chelsi Hollinsworth to work during the year 2019 with no valid dental assisting permit.

Ct II – FAILURE TO DISPLAY PERMIT IN VIOLATION OF 59 O.S. § 328.21, specifically for not displaying a current dental assisting permit for Chelsi Hollinsworth in 2019.

POTENTIAL SANCTION(S)

The Board is authorized, after notice or opportunity for a hearing pursuant to Article II of the Administrative Procedures Act, to issue an order to impose sanction(s) whenever the Board finds, by clear and convincing evidence, that a licensee has violated the State Laws or Rules in regards to their license. The minimum to maximum sanction in the matter ranges from no action to revocation of license and an administrative fine of up to \$1500 per violation. We request for the matter to be set for hearing on the next Board Agenda.

ATTORNEY'S FEES

The Board is authorized, after notice or opportunity for a hearing pursuant to Article II of the Administrative Procedures Act, to request the costs of prosecution and attorney's fees be recovered from the Respondent. The Board is requesting costs and attorney's fees.

Respectfully Submitted,



Susan Rogers, Esq.
Executive Director

Date Jan 13, 2020

Panel Members

Dr. James Gore

Dr. Krista Jones

Investigator

Jeff Puckett

