

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

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

vs.

**JENNIFER STUMPF, D.A. permit #7517,
Respondent**

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Case No: 19-74 (E)

STATEMENT OF COMPLAINT

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

GENERAL BACKGROUND

1. The Board has jurisdiction over the Respondant 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. **JENNIFER STUMPF, D.A. permit #7517** is licensed to practice dental assisting in the State of Oklahoma and has not previously been before the Board. Ms. Stumpf's State Dental Assistant permit is currently in full force and effect and was originally issued June 15, 2010. The actions relevant to this Statement of Complaint occurred in and around Edmond and Oklahoma City, Oklahoma.
3. The acts and omissions, which constitute the allegations contained in this Statement of Complaint, occurred between June of 2019 through August 19, 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 this 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 June 20th, 2019 regarding a hygienist that had been working without a valid license for almost 6 months. Dr. Howl assigned Dr. Krista Jones and Dr. Jim Gore to the investigative panel. Dr. Jones is recused from this case as the District 5 representative, so Dr. Crawford was assigned by Dr. Howl.
2. Investigator Puckett spoke to Dr. Allen, one of the owners of Santa Fe Dental, on August 6, 2019. Dr. Mark Allen stated that he knew Courtney Morris, RDH had an issue with her license, but was not aware that it had been expired for six (6) months. Dr. David Allen is also a dentist and co-owner of this practice and as such shares in the duties of oversight of dental staff that are required to be permitted and work under the authority of a licensed Oklahoma dentist.
3. Dr. Mark Allen was asked how many other dental assistants and hygienists worked at the practice. Dr. Mark Allen advised that seven assistants and 6 hygienists worked at that clinic along with three other dentists, Dr. Michael Hansen, Dr. David Allen, Dr. Roseane Tran who works periodically on weekends and Dr. Ryan Flake a newly hired dentist. Investigator Puckett verified that all the remaining staff members had valid licenses and/or permits except dental assistant, Jennifer Stumpf who had not had a valid permit since 2017.
4. Investigator Puckett asked Dr. Mark Allen if the dentists and staff had their licenses posted as required. He advised that they did not. The posting of dental licenses in offices not only assures the public that a qualified medical professional is in charge of their care, but more importantly reminds all of the staff of the importance of maintaining a valid current license.
5. The Respondent has taken full responsibility for his actions and has 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 --UNLICENSED PRACTICE AS A DENTAL ASSISTANT WITHOUT A VALID PERMIT IN VIOLATION OF O.S. 59 O.S. § 328.24.

CT. II -- FAILING TO DISPLAY A VALID DENTAL ASSISTING PERMIT IN VIOLATION OF 59 O.S. § 328.21(J).

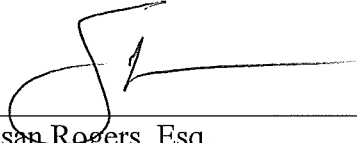
POTENTIAL SANCTION(S)

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 this matter ranges from no action to revocation of license and an administrative fine of up to \$1500 per violation. We request for this 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,

A handwritten signature in black ink, appearing to be 'S. Rogers', written over a horizontal line.

Susan Rogers, Esq.
Executive Director

Date Oct. 13, 2020

Panel Members

Dr. Stan Crawford

Dr. Jim Gore

Investigator

Jeff Puckett

