

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

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

vs.

JESSICA R. WADE, D.A. permit #2769
Respondent

OKLAHOMA BOARD
OF DENTISTRY
OCT 12 2021
ADMINISTRATIVE
COURT
Case No: 21-63

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. **JESSICA R. WADE, Dental Assistant, Permit #2769** is permitted to as a dental assistant in the State of Oklahoma. Jessica Wade's permit is currently in full force and is believed to have been originally permitted since at least January 1st 2014. The actions relevant to the Statement of Complaint occurred in and around the city of Oklahoma City, Oklahoma County, Oklahoma.
3. The acts and omissions, which constitute the allegations contained in the Statement of Complaint, occurred during the period from July 15, 2021 through July 21, 2021, 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 August 13, 2021 regarding a dental assistant that the dental office had fired for stealing money from patients and staff. Dr. Howl assigned Dr. Jeff Lunday and Dr. Krista Jones to the investigative panel.
2. Investigator Lowe contacted the office manager for the dental office of Dr. Matthew McReynolds in Oklahoma City. The office manager, Megan Johns advised that a patient had alleged that money had been taken from her wallet during her office visit while she was receiving treatment. Investigator Lowe spoke to patient NJ who advised that she was at the dental office on July 15th, 2021. Prior to the appointment she had put \$500 cash in her purse to pay for her treatment that day. During the appointment, she stated that she was watching television but that the dental assistant, Jessica Wade, had bumped into her chair several times where her purse was located. On July 16, 2021, the office manager and Dr. Matthew McReynolds interviewed all of the staff and no one confessed to having taken the money from the patient.
3. On July 17, 2021, the office manager received a phone call from Victoria Thompson, R.D.H. who reported that on July 16th, 2021, she had \$400 cash inside her wallet and at the end of the day she could not find it. After going home and searching her purse and residence for the missing currency. Victoria Thompson, R.D.H. contacted the office manager regarding the money and said that she had not said anything the previous day because she wanted to check at home to make sure she had not misplaced it.
4. On July 19, 2021, Jessica Wade, D.A. was caught on video taking money from Victoria Thompsons, R.D.H.'s wallet. Dr. Matthew McReynolds confronted Jessica Wade, D.A. who handed Dr. McReynolds the stolen money she was seen taking on video. Jessica Wade was fired from the dental office.
5. A second Dental Assistant, Lacey Large, had money stolen from her purse a few days previous while in the dental office. Jessica Wade admitted to her through text that she had stolen the money, that she was sorry and she would pay it back.
6. Investigator Lowe attempted to contact the Respondent several times with no response. Investigator Lowe, then went to her house in Chandler, left a business card and Jessica Wade then texted Investigator Lowe agreeing to come in for an interview. She did not show up, and texted that it would be the following week before she could come in. Eventually, she stopped responding to Investigator Lowe's texts or phone calls. Respondent has not cooperated with the investigation at all.

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

CT. I – BEING SHOWN TO BE GROSSLY IMMORAL AND THAT IT REPRESENTS A CONTINUING THREAT TO PATIENT CARE OR TREATMENT; 59 O.S. § 328.29 (A)(2); 59 OS 328.32(A)(15);

CT. II – BEING DISHONEST IN A MATERIAL WAY WITH A PATIENT; 59 O.S. § 328.29 (A)(2); 59 OS 328.32(A)(33);

FAILURE TO COOPERATE WITH AN INVESTIGATION, 59 O.S. § 328.29(A)(2); 59 OS 328.32(A)(40);.

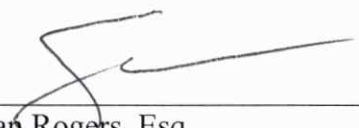
POTENTIAL SANCTION(S)

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

Oct. 12, 2021

CASE IS SET FOR HEARING ON NOVEMBER 5, 2021 AT 9:00 A.M. AT: The State Board of Dentistry Conference Room , 2920 N. Lincoln Blvd., Suite B, Oklahoma City, Oklahoma.

Respondent Served in Person by:

INVESTIGATOR STEVE LOWE - 

Date:

10.14.2021 - 0645 hours - Phillips 66 Gas Station - 310 W. 1st STREET
Chandler, OK 74634

Panel Members

Dr. Jeff Lunday
Dr. Krista Jones

Investigator

Steve Lowe