

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: July 9, 2026 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 July 7, 2026 at 12:15PM. 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. Approval of the June 11, 2026 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. Review complaints with possible vote for probable cause or other action

- 26-41 Non-Payment of Vendor Issues
- 26-61 Cremation and Death Certificate Issues
- 26-63 Next of Kin Issues
- 26-64 Embalming Issues
- 26-65 Insurance Policy Issues
- 26-66 Harassing Funeral Director
- 26-67 Headstone Issues
- 26-69 Non-Payment of Vendor Issues

7. Matters for consideration: Consent Order, Hearing, Motion to Enforce, 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.

7A. Complaint 25-13, Pollard Funeral Home, OKC, Pollard Funeral Home, Inc, Charles Pollard II, FDIC. Member Davenport needs to recuse.

7B. Complaint 25-42, Pollard Funeral Home, OKC, Pollard Funeral Home, Inc, Charles Pollard II, FDIC, Bayley Foster, Individual. Member Davenport needs to recuse.

8. Matters for consideration: Appointment of Hearing Officer and Recusal and Disqualification of Board Members

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 26-08, Alpha & Omega Mortuary Service and Crematory, OKC, Stillwell Limited, Inc. OKC, Heather Squires, FDIC. Member Matherly needs to recuse.

8B. Complaint 26-15, Alpha & Omega Mortuary Service and Crematory, OKC, Stillwell Limited, Inc. OKC, Heather Squires, FDIC. 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. Zoe Wood, Union City, Huber-Benson FH, El Reno
2. Kristopher McCune, Broken Bow, Bunch-Singleton FH, Broken Bow
3. Haley Sitton, Hominy, Chapman-Black FH, Cleveland (EM Only)
4. Avalon Clark, Tahlequah, Reed-Culver FH, Tahlequah
5. Tatum Silva, Garber, Anderson-Burris FH&C, Enid
6. Alysha Minniear, Tulsa, Butler-Stumpff & Dyer Cremation Society of OK, Tulsa (EM Only)
7. Jessica Ward, Woodward, Billings FH, Woodward
8. Kinesey Sherman, Edmond, Chapel Hill FH, OKC

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

1. William Dickson, Skiatook, Sien-Shelton FH, Skiatook
2. Alejandra Guzman, OKC, Mercer-Adams FS, Bethany
3. Rachel Stuck, Edmond, Smith & Kernke FD, OKC

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

1. Kanisha Pankratz, Woodward, Billings FH, Woodward

D. Funeral Director Assistant (Original)

1. Brandy Jeffreys, McAlester, Chaney-Harkins FH, McAlester

2. Raven Benson, McAlester, Bishop FS&C, McAlester
3. Thaddeus Kassheimer, Ringling, Alexander Gray FH, Wilson
4. Patrick Hamilton, Bixby, Schaudt's Glenpool-Bixby FS&CC, Glenpool
5. Angela Willoughby, Garvin, Clardy FS, Idabel
6. Joe Lessert, Ponca City, Trout FH&C, Ponca City

E. Funeral Director and/or Embalmer (Original)

1. Alec Richardson, Cyril (FD Only)
2. NeKiesha Flowers, MWC (FD Only)
3. Kaleb Biglow, Muskogee (FD Only)

F. Establishments

1. Walker Funeral & Cremation Service, Shawnee, request to change name to Riley-Walker Funeral Service & Crematory
2. Thomas & Chenoweth Funeral Home, Welch, request to close establishment
3. Brown-Winters Funeral Home and Cremation Services, Welch, new establishment, Family Service Group, LLC, owner, Jason Winters, FDIC
4. Comanche Nation Funeral Home, Lawton, request to change FDIC from Sharlene Eschiti to Kari Norberto
5. Rice Funeral Service & Cremation Center, Claremore, request to change FDIC from Danilo Gaton to Preston Childress
6. Rice Funeral Service & Cremation Care +, Catoosa, request to change FDIC from Danilo Gaton to Preston Childress
7. Resthaven Funeral Home, Shawnee, request to change FDIC from Roger Allen to Ruth Leach
8. Mercer-Adams Funeral Service, Bethany, request to close establishment
9. Mercer-Adams Funeral Service, Bethany, new establishment, PLC-OK Assets, LLC, Owner, Timothy Adams, FDIC

## G. Crematories

1. Riley-Walker Crematory, Shawnee, new crematory, Transitional Services, LLC, Owner, Mark Riley, FDIC
2. Trout Funeral Home & Crematory, Ponca City, request to change FDIC from Preston Childress to Douglas Michael Phenix
3. Green Country Cremation Center, Sapulpa, request to change of FDIC from Robert Bethany to Preston Childress

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. Election of Board President for FY27

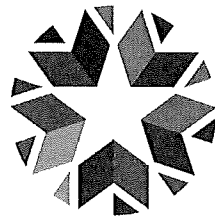
13. Election of Board Vice-President for FY27

14. Adjournment

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Tyler Stiles, MBA  
Executive Director

The next regular meeting of the Oklahoma Funeral Board will be held: **August 13, 2026.** 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

June 11, 2026

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### BOARD MEMBERS

Darin Corbett  
John Davenport  
Glenn Dunn  
Brent Matherly  
Jeremy Sparks  
Bart Watkins

### STAFF

Rochelle Covington  
Tyler Stiles  
Kylie Cooper, AAG  
Liz Stevens, 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 June 8, 2026 at 10:00AM. 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 Corbett, Davenport, Dunn, Matherly, Sparks, and Watkins were present. Member Coble was absent. A quorum was always present.

Motion by Davenport second by Sparks to approve the May 11, 2026 Regular Board meeting minutes. The motion passed unanimously.

Dustin Pierce with OKFDA reported that the Women's Conference will be July 12-14. Go to the OKFDA website for details and to register.

Risa Thomas with OID reported that reviews have been emailed already and if there are any questions, please contact them.

The Health Department will have office hours on Friday from 10-12 and the webinar on Monday and Tuesday.

Motion by Davenport second by Sparks to dismiss complaint 25-41 regarding Overcharging. The motion passed unanimously.

Motion by Sparks second by Davenport to dismiss complaint 26-28 regarding Licensing Issues. The motion passed unanimously.

Motion by Sparks second by Davenport to find probable cause on complaint 26-51 regarding Non-Payment of Vendor Issues. The motion passed unanimously.

Motion by Watkins second by Davenport to find probable cause on complaint 26-52 regarding Non-Payment of Vendor Issues. The motion passed unanimously.

Motion by Davenport second by Dunn to dismiss complaint 26-53 regarding Non-Payment of Vendor Issues. The motion passed unanimously.

Motion by Davenport second by Dunn to dismiss, due to lack of jurisdiction, complaint 26-60 regarding Cemetery Issues. The motion passed unanimously with member Sparks abstaining.

Regarding the matters for consideration: Consent Order, Hearing, Motion to Enforce, or Scheduling Order: Complaints 23-72, 24-08, 24-20, Heritage Funeral Home and Cremation Services, LLC, OKC, Christopher Harrison, Individual. Complaints 23-16, 25-05, 25-14, 25-17, 26-26, Central Oklahoma Heritage Funeral Directors LLC, OKC, Heritage Funeral Home and Cremation Services, LLC, OKC, Christopher Harrison, Individual. The prosecution was represented by Kylie Cooper, AAG. Liz Stevens, AAG, was the Board's legal advisor. Members Davenport, Dunn, Sparks, and Watkins heard the case. Members Matherly and Corbett were recused from the case and they left the room.

After the presentation of the agreed upon Consent Order, 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 items were discussed and no votes were taken while in executive session. The motion passed unanimously.

Motion by Davenport second by Dunn to approve the Consent Order. The Consent Order reflected Respondents agree to an administrative penalty of \$5,000, Christopher Harrison's funeral director and embalmer licenses are suspended for 1 year, Restitution total of

\$6,809.16, establishment license is suspended for 1 year, cost of \$500. The motion passed unanimously.

Members Matherly and Corbett reentered the room.

No action taken regarding Complaint 25-13, Pollard Funeral Home, OKC, Pollard Funeral Home, Inc, Charles Pollard II, FDIC

No action taken regarding Complaint 25-42, Pollard Funeral Home, OKC, Pollard Funeral Home, Inc, Charles Pollard II, FDIC, Bayley Foster, Individual

Motion by Matherly second by Davenport to approve the following: Apprenticeship (Original) Michael Kohler, Elk City, Martin-Dugger FH&CS, Elk City; Ector Rubio, OKC, John Ireland & Son FH&C, Moore; Samantha Harjo, Altus, Kincannon FH&CS, Altus; Kinlee Basquez, Okmulgee, McClendon-Winters FH, Okmulgee. The motion passed unanimously.

Motion by Matherly second by Davenport to approve the following: Apprenticeship (1st Extension). Jamie Smart, Duncan, Carter-Smart FH, Duncan; Samantha Horschler, Lawton, Lawton Ritter Gray FH, Lawton; Brionna Gray, Norman, Advantage F&CS- S. Chapel, OKC; Kaci Pembroke, Enid, Brown-Cummings FH, Enid (EM Only); Lisa Shipman, Bartlesville, Stumpff FH&C, Bartlesville; Lillian Laumbach, Yukon, Memorial Park FH, OKC. The motion passed unanimously.

Motion by Matherly second by Corbett to approve the following: Apprenticeship (2nd Extension). Joshua Eastham, Tulsa, Stumpff FH&C, Bartlesville. The motion passed unanimously.

Motion by Matherly second by Davenport to deny the following: Funeral Director Assistant (Original), Darin Haddox, Claremore, MMS-Payne FH&CS, Claremore. The motion passed unanimously.

Motion by Matherly second by Davenport to deny the following: Funeral Director Assistant (Original), Maranda Brown, Broken Arrow, Brown's F&CS, Coweta. The motion passed unanimously.

Motion by Matherly second by Davenport to table the following: Funeral Director Assistant (Original), Brandy Jeffreys, McAlester, Chaney-Harkins FH, McAlester; Raven Benson, McAlester, Bishop FS&C, McAlester; Thaddeus Kassheimer, Ringling, Alexander Gray FH, Wilson; Patrick Hamilton, Bixby, Schaudt's Glenpool-Bixby FS&CC, Glenpool; Angela Willoughby, Garvin, Clardy FS, Idabel. The motion passed unanimously.

Motion by Matherly second by Davenport to approve the following: Funeral Director and/or Embalmer (Original), Charlie Grisham, Henryetta (EM Only); Faith Carney, Edmond; Lauren Sloan, Sapulpa (EM Only); Lezzy Olmedo, Tulsa (FD Only); Tabitha Brown, Stillwater (FD Only). The motion passed unanimously.

Motion by Matherly second by Davenport to table the following: Funeral Director and/or Embalmer (Original), Alec Richardson, Cyril (FD Only); NeKiesha Flowers, MWC (FD Only); Kaleb Biglow, Muskogee (FD Only). The motion passed unanimously.

Motion by Matherly second by Sparks to approve the following: Establishments, El Camino Real Funeral Home, Tulsa, New Establishment, El Camino Real LLC, Owner, Robert Simons, FDIC; Strode Funeral Home and Cremation, Inc., Stillwater, request to close establishment; Strode Funeral Home and Cremation, Stillwater, New Establishment, PLC-OK Assets, LLC, Owner, Loy Morris, FDIC; County Cremation Service, Ponca City, request to close establishment; Trout Funeral Home & Cremation Service of Tonkawa, Tonkawa, request to change FDIC from Preston Childress to Douglas Michael Phenix; Trout Funeral Home and Crematory, Ponca City, request to change FDIC from Preston Childress to Douglas Michael Phenix. The motion passed unanimously.

Motion by Matherly second by Sparks to approve the following: Crematories, Strode Crematory, Stillwater, New Crematory, PLC-OK Assets, LLC, Owner, Loy Morris, FDIC. The motion passed unanimously.

There was no new business

Agency Financial update- Mr. Stiles reported gross receipts for May 2026 to be \$5,960.00 with \$596.00 going to the State of Oklahoma general fund. The expenses for the same timeframe totaled \$31,915.85 and net income after expenses totaled -\$26,551.85

Motion by Sparks second by Davenport to adjourn the meeting at 10:42AM. 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:**

**Pollard Funeral Home (1204ES)**

2626 North Post Road

Oklahoma City, OK 73141

Owned by:

**Pollard Funeral Home, Inc**

2626 North Post Road

Oklahoma City, OK 73141

**Charles Pollard II**

Licenses: 1611FD and 1887EM,

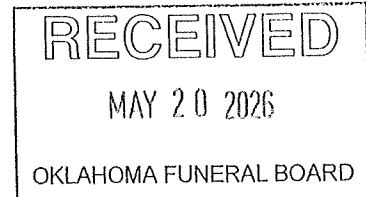
Address: 2626 North Post Road

Oklahoma City, OK 73141

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

**POLLARD FUNERAL HOME**

**Respondent.**



**Complaint No. 25-13**

**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, CHARLES POLLARD, POLLARD FUNERAL HOME, and POLLARD FUNERAL HOME, INC. 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 POLLARD FUNERAL HOME (“Funeral Home”) is licensed by the Board, establishment license number 1204ES, and is located at 2626 North Post Road, Oklahoma City, OK 73141.
2. Respondent CHARLES POLLARD II (“Funeral Director in Charge” or “FDIC”) is licensed by the Board as a funeral director and embalmer, license numbers 1611FD and 1887EM, and at all relevant times was the Funeral Director in Charge at Funeral Home.
3. Respondent POLLARD FUNERAL HOME, INC. (“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 9, 2024, Board staff received a complaint from a consumer regarding the death of his brother. The complaint alleged that the decedent, Stacey Earl Womack (“Womack”) was to be cremated after a funeral service that was scheduled for September 7, 2024.

6. Further, the complaint alleged that Mr. Womack was cremated prior to his funeral service and family arrival, therefore the family did not get to see or identify Mr. Womack. The funeral service had to be moved, no longer had an open casket or viewing, and was turned into a memorial service.

7. On September 10, 2024, Board staff notified the Respondents of the Complaint. The Board provided Respondents with the Notice of Complaint via certified letter, which was mailed on that date.

8. On September 23, 2024, Respondents filed their response to Complaint 25-13 with the Board. Respondents stated that it was a mistake made by a new employee, who did not understand the proper procedure.

9. By public vote during the meeting on November 14, 2024, the Board found probable cause to file a formal complaint against Respondents for the violations alleged herein.

10. 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**

11. Respondents violated OAC 235: 10-7-2(10) when they improperly cremated Mr. Womack without the express written approval of the authorizing agent. OAC 235:10-7-2(10) states:

“(10) **Desecration.** Damage, abuse, desecration or the unauthorized removal of tissue, bones, or organs of any human remains in the custody of a licensed funeral service 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 requires by 63 O.S. §1-329 or cremating dead human remains without express written approval of the authorizing agent.”

12. Further, Respondents violated OAC 235:10-7-2(13) by failing to provide the services contracted for and/or by making substitution for services or merchandise contracted for without the authorization of the customer. OAC 235:10-7-2(13) states:

“(13) **Charging.** for service or merchandise not contracted for or failing to provide the services or merchandise contracted for or making substitution for services or merchandise contracted for without the authorization of the customer.

13. Finally, 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. §57a(a), because the price charged on the Statement of Goods and Services is a different price than listed on the Funeral Home’s GPL.

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 CHARLES POLLARD II, 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**

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 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.

16. 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.*

17. 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 **June 11, 2026 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**

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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).

**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 line extending from the end of the name.

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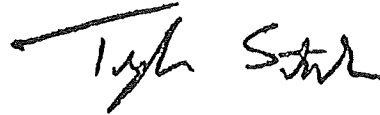
Kylie Cooper, OBA # 32758  
Assistant Attorney General  
Office of the Oklahoma Attorney General  
313 NE 21<sup>st</sup> Street  
Oklahoma City, OK 73105  
kylie.cooper@oag.ok.gov  
Attorney for Oklahoma Funeral Board

CERTIFICATE OF SERVICE

I hereby certify that on the 20<sup>th</sup> day of May, 2026, a true and correct copy of the foregoing *Complaint and Notice of Hearing* was served\by mailing by Certified Mail as follows:

CHARLES POLLARD II  
2626 North Post Road  
Oklahoma City, OK 73141

POLLARD FUNERAL HOME, INC  
2626 North Post Road  
Oklahoma City, OK 73141

A handwritten signature in black ink, appearing to read "Tyler Stiles", 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:**

**Pollard Funeral Home (1204ES)**  
2626 North Post Road  
Oklahoma City, OK 73141

Owned by:

**Pollard Funeral Home, Inc**  
2626 North Post Road  
Oklahoma City, OK 73141

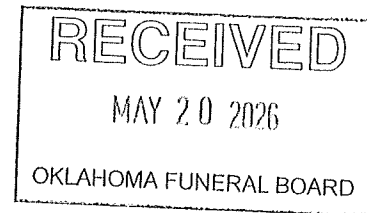
**Bayley Foster**  
2626 North Post Road  
Oklahoma City, OK 73141

**Charles Pollard II**

Licenses: 1611FD and 1887EM,  
Address: 2626 North Post Road  
Oklahoma City, OK 73141

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

**POLLARD FUNERAL HOME**



**Complaint No. 25-42**

**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, CHARLES POLLARD, BAYLEY FOSTER, POLLARD FUNERAL HOME, and POLLARD FUNERAL HOME, INC. 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 POLLARD FUNERAL HOME (“Funeral Home”) is licensed by the Board, establishment license number 1204ES, and is located at 2626 North Post Road, Oklahoma City, OK 73141.
2. Respondent CHARLES POLLARD II (“Funeral Director in Charge” or “FDIC”) is licensed by the Board as a funeral director and embalmer, license numbers 1611FD and 1887EM, and at all relevant times was the Funeral Director in Charge at Funeral Home.
3. Respondent BAYLEY FOSTER is not licensed with the Board, and at all times was an employee of Pollard Funeral Home.
4. Respondent POLLARD FUNERAL HOME, INC. (“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.

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 June 14, 2025, Board staff received a complaint from a consumer regarding the death of his sister, Charlotte Mitchell. During the investigation, Board staff determined that Bayley Foster, an unlicensed employee of the Funeral Home, was the only employee who met with the decedent's family to plan the arrangements, write the contract, and help the family determine how the service and viewing would be scheduled.

7. Further, during the making of arrangements, Bayley Foster had to leave the room and call an unknown person to ask various questions. No other employee of the Funeral Home was present when the family was deciding the arrangements and signing the contracts. The family did not see Mr. Pollard or any other employee.

8. On June 16 2025, Board staff notified the Respondents of the Complaint. The Board provided Respondents with the Notice of Complaint via certified letter, which was mailed on that date.

9. On June 25, 2025, Respondents filed their response to Complaint 25-42 with the Board.

10. 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.

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 violated OAC 235: 10-7-2(6), which prohibits the practice of funeral directing by an individual not licensed as a funeral director, when Bayley Foster met with the decedent's family, wrote and supplied the contract, and helped them make arrangements, as an unlicensed employee.

13. Further, Respondents violated OAC 235: 10-7-2(27), which prohibits "aiding or abetting an unlicensed person, establishment, or entity in the practice of funeral directing..."

14. Finally, Respondents violated 59 OS §396.12c, by failing to comply with the Funeral Rules of Federal Trade Commission, 15 U.S.C. §57a(a), when the prices listed on the Statement of Goods and Services for embalming were different than the price listed in the GPL.

15. 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 CHARLES POLLARD II, as the Funeral Director in Charge of the Funeral Home is also liable for the above violations.

16. 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**

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 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.

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 **June 11, 2026 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**

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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).

**PROPOSED CONSENT ORDER** to the Board on the same date and time. *See* 75 O.S. § 309(E).

Respectfully submitted:



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Kylie Cooper, OBA # 32758  
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

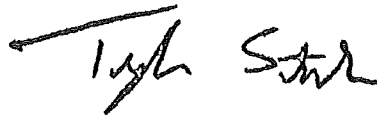
**CERTIFICATE OF SERVICE**

I hereby certify that on the 20<sup>th</sup> day of May, 2026, a true and correct copy of the foregoing *Complaint and Notice of Hearing* was served\by mailing by Certified Mail as follows:

CHARLES POLLARD II  
2626 North Post Road  
Oklahoma City, OK 73141

POLLARD FUNERAL HOME, INC  
2626 North Post Road  
Oklahoma City, OK 73141

BAYLEY FOSTER  
2626 North Post Road  
Oklahoma City, OK 73141



---

Tyler Stiles,  
MBA Executive  
Director

IN AND BEFORE THE OKLAHOMA FUNERAL BOARD

STATE OF OKLAHOMA

IN THE MATTER OF THE COMPLAINT )  
AGAINST: )

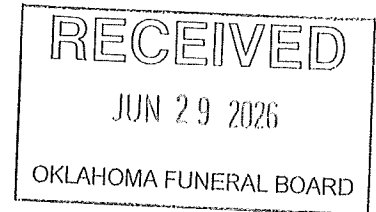
**ALPHA & OMEGA MORTUARY SERVICE )  
& CREMATORY )**

A Licensed Commercial Embalming Establishment, )  
Establishment License #2015CE )  
4040 North Stiles )  
Oklahoma City, OK 73105 )

**Owned by: )  
STILLWELL LIMITED, INC. )**  
4040 North Stiles )  
Oklahoma City, OK 73105 )

**HEATHER SQUIRES )**  
Licenses: 2963FD and 3345EM )  
Address: 4901 Lance Dr. )  
Oklahoma City, OK 73150 )  
A Licensed Funeral Director and Embalmer and )  
The Funeral Director in Charge at )  
**ALPHA & OMEGA MORTUARY SERVICE )  
& CREMATORY )**

**Respondents. )**



Informal Board  
Complaint No. 26-08

**MOTION FOR APPOINTMENT OF A HEARING OFFICER AND MOTION  
FOR RECUSAL AND DISQUALIFICATION OF MEMBERS OF THE  
OKLAHOMA FUNERAL BOARD**

Respondents, Alpha & Omega Mortuary Service & Crematory, Stillwell Limited Inc., and Heather Squires (collectively "Respondents"), hereby move for appointment of a Hearing Officer, who has the power and authority for all further action on behalf of the Oklahoma Funeral Board with regard to informal Board Complaint No. 26-08 ("Informal Complaint"), pursuant to 59 O.S. § 396.12f(F) and the Oklahoma Administrative Procedures Act. Respondents further seek to disqualify

and recuse all members of the Oklahoma Funeral Board ("Board") from any further consideration or adjudication with regard to the Informal Complaint after appointment of a neutral and qualified Hearing Officer as requested herein, pursuant to OAC 235:10-9-9(g) and 75 O.S. § 316 of the Oklahoma Administrative Procedures Act. Respondents are authorized to state that the Executive Director and Counsel for the Oklahoma Funeral Board are in agreement with and do not object to this Motion. In further support of Respondents' Motion, they state as follows:

**PROPOSITION I  
APPOINTMENT OF A HEARING OFFICER**

Respondents move to have the Oklahoma Funeral Board appoint a neutral and qualified Hearing Officer with the power and authority to determine whether probable cause exists, and adjudicate the Informal Complaint accordingly, including any resolution thereof, pursuant to 59 O.S. § 396.12f(F), and the Oklahoma Administrative Procedures Act. Respondents seek appointment of a Hearing Officer due to the conflicts of interest that exist as to the Board as set forth in Proposition II, *infra*. Respondents request that the Hearing Officer appointed be neutral and qualified; Respondents further request that the Hearing Officer be a licensed attorney who has experience adjudicating administrative proceedings for the Oklahoma Funeral Board and/or other professional licensing administrative agencies.

**PROPOSITION II  
DISQUALIFICATION AND RECUSAL OF THE OKLAHOMA  
FUNERAL BOARD**

Respondents move to have the Board disqualified and recused from further consideration and adjudication as it relates to the Informal Complaint, because of the Board's inability to provide a fair and impartial hearing and adjudication of the Informal Complaint, including probable cause, and because of the existing conflicts of interest. All of the licensed members of the Board are either current or former customers of Respondent Alpha & Omega or are a competitor to Respondent Alpha & Omega, and therefore, these members have a financial interest in the outcome of the hearing and therefore, should be recused from the proceedings related to the Informal Complaint, including any determination of probable cause. With the recusal and disqualification of the licensed members of the Oklahoma Funeral Board, there are not enough members to satisfy the quorum obligations necessary to determine probable cause or adjudicate the Informal Complaint.

The Board is comprised of seven (7) members; two (2) of which are members of the general public. 59 O.S. § 396. The current Board members are Brent Matherly ("Matherly"), Tom Coble ("Coble"), Darin Corbett ("Corbett"), Glenn Dunn ("Dunn"), John Davenport ("Davenport"), Jeremy Sparks ("Sparks"), and Bart Watkins ("Watkins").

The five (5) members of the Board who are licensed by the Oklahoma Funeral Board are either a competitor of Respondent or use or have used the services of Respondent and therefore, a conflict of interest exists with regard to these members. As a result of the conflicts of interest recusal is warranted as to the five (5) licensed

Board members; recusal of these five (5) Board members results in an insufficient number of members to establish a quorum.

Moreover, disqualification is warranted because the Board is disqualified from further consideration of the Informal Complaint, because on two (2) separate occasions the Board was presented with a proposed Consent Order to resolve Informal Complaint 26-08 prior to any probable cause determination, specifically during its February 11, 2026, meeting and again during its March 12, 2026.

A proposed Consent Order was drafted and agreed upon by the Executive Director of the Oklahoma Funeral Board, counsel for the parties, and Respondents. The following members of the Board were present and considered the Consent Order to resolve the Informal Complaint on February 11, 2026: Coble, Corbett, Davenport, Dunn, and Sparks; Matherly recused himself from consideration. See Exhibit 1, Pertinent Portions of the Board's Minutes. Only one (1) member of the Board was not present on February 11, 2026, to wit: Watkins. The Board deliberated the proposed Consent Order in Executive Session, and requested counsel for the parties to answer questions, and then excused counsel so that the Board could continue its deliberations. Once the regular meeting resumed, the Board voted to table the proposed Consent Order until its next meeting on March 12, 2026.

The proposed Consent Order was revised in an effort to address the perceived inquiries and concerns raised by the Board during the February 11, 2026, meeting. The revised proposed Consent Order was agreed upon by the Executive Director of the Oklahoma Funeral Board, counsel for the parties, and Respondents.

On March 12, 2026, the revised proposed Consent Order was presented and considered by the Board; the Consent Order was rejected. *See* Exhibit 2, Pertinent Portions of the Notes from the March 12, 2026, Board meeting. Watkins is the only member who was not present during either the February or March meeting. During the March 12, 2026, meeting the Board was presented with and considered the revised Proposed Consent Order; the Board deliberated the Proposed Consent Order in Executive Session, and ultimately the Board voted to reject the revised Proposed Consent Order.

The information presented in the proposed Consent Orders was presented to resolve the Informal Complaint without further prior to a determination of probable cause and it was agreed upon by the Executive Director of the Oklahoma Funeral Board, counsel for the parties, and Respondents.

The conflicts of interests that existed at the time of the Board's consideration proposed Consent Orders, appear to have further impacted and influenced the Board during its consideration, deliberation, and rejection of the proposed Consent Orders that had been approved and agreed to by the Executive Director and counsel for the Board, further highlighting the Board's inability to provide a fair and impartial hearing, pursuant to 75 O.S. § 316 and OAC 235:10-9-9.

The conflicts of interest that exist and the impact these conflicts of interests had during the consideration, deliberation, and ultimate rejection of the Consent Orders is apparent, and necessarily impairs the Board's ability "accord a fair and impartial hearing or consideration." 75 O.S. § 316.

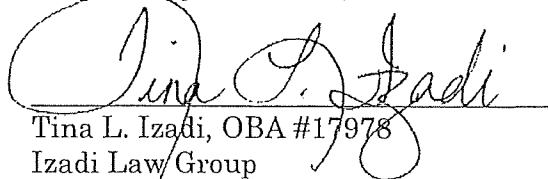
Once the members with conflicts of interest, including those who have deliberated and considered the proposed Consent Orders, are recused and disqualified, there is an insufficient number of members remaining to create a quorum to adjudicate the Informal Complaint. *See* 59 O.S. § 396.22; OAC 235:10-9-9(d).

For the foregoing reasons, Respondents request recusal and disqualification of the members of the Board with conflicts of interest, including those who have considered and deliberated the proposed Consent Orders, from further consideration and adjudication as to the Informal Complaint after the Board has appointed a neutral and qualified Hearing Officer as set forth in Proposition I, *supra*.

**RELIEF REQUESTED**

Respondents request the Board assign and transfer the Informal Complaint to a neutral and qualified Hearing Officer in all respects as it relates to the Informal Complaint, including any resolution or determination as to probable cause; Respondents further request recusal and disqualification of the Board from any further consideration regarding Informal Complaint 26-08 as set forth herein.

Respectfully submitted,

A handwritten signature in cursive script, reading "Tina L. Izadi", written over a horizontal line.

Tina L. Izadi, OBA #17978  
Izadi Law Group  
16354 Muirfield Place, Suite B  
Edmond, OK 73013  
(O) 405-471-6492; (F) 405-562-5201  
Email: tizadi@izadilaw.com

and

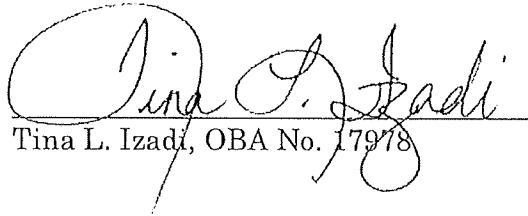
Larry A. Morgan, OBA #6395  
Morgan and Morgan, P.C.  
11912 N. Pennsylvania Ave., Suite D-1  
Oklahoma City, OK 73120-7830  
P: (405) 748-6200 / F: (405) 748-6061  
Email: larrymorgan@morganandmorganlaw.com

**Attorneys for Respondents Alpha & Omega  
Mortuary Service & Crematory, Stillwell Limited,  
Inc., and Heather Squires**

**DECLARATION**

The undersigned counsel for Respondents hereby declares under penalty of perjury that the summary of the facts and circumstances contained in the foregoing motion are true, correct, and accurate to the best of her knowledge and that the foregoing motion sets forth the basis for disqualification as required by 75 O.S. § 316. This declaration was signed in Edmond, Oklahoma County, State of Oklahoma.

Dated this 26<sup>th</sup> day of June 2026.

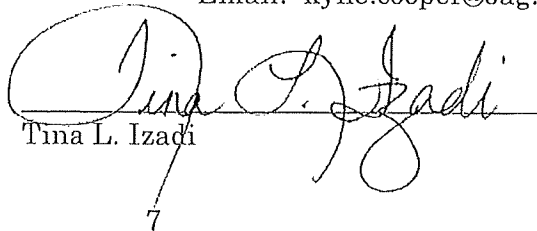
  
Tina L. Izadi, OBA No. 17978

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 26<sup>th</sup> day of June 2026, a true and correct copy of the foregoing was sent to and served on the following persons via email and/or via U.S. Mail, postage prepaid, to the addresses listed below:

Tyler Stiles, Executive Director  
Oklahoma Funeral Board  
3700 N. Classen Blvd., Ste. 175  
Oklahoma City, OK 73118  
Email: tyler.stiles@funeral.ok.gov

Joseph L. Ashbaker, OBA No. 19395  
Kylie Cooper, OBA No. 32758  
Office of Oklahoma Attorney General  
313 N.E. 21<sup>st</sup> Street  
Oklahoma City, OK 73105  
Email: joe.ashbaker@oag.ok.gov  
Email: kylie.cooper@oag.ok.gov

  
Tina L. Izadi  
7

IN AND BEFORE THE OKLAHOMA FUNERAL BOARD

STATE OF OKLAHOMA

IN THE MATTER OF THE COMPLAINT )  
AGAINST: )

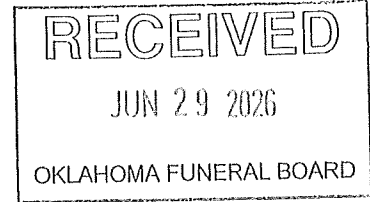
**ALPHA & OMEGA MORTUARY SERVICE )  
& CREMATORY )**

A Licensed Commercial Embalming Establishment,) )  
Establishment License #2015CE )  
4040 North Stiles )  
Oklahoma City, OK 73105 )

**Owned by: )  
STILLWELL LIMITED, INC. )**  
4040 North Stiles )  
Oklahoma City, OK 73105 )

**HEATHER SQUIRES )**  
Licenses: 2963FD and 3345EM )  
Address: 4901 Lance Dr. )  
Oklahoma City, OK 73150 )  
A Licensed Funeral Director and Embalmer and )  
The Funeral Director in Charge at )  
**ALPHA & OMEGA MORTUARY SERVICE )  
& CREMATORY )**

**Respondents. )**



Complaint No. 26-15

**MOTION FOR APPOINTMENT OF A HEARING OFFICER AND MOTION  
FOR RECUSAL AND DISQUALIFICATION OF MEMBERS OF THE  
OKLAHOMA FUNERAL BOARD**

Respondents, Alpha & Omega Mortuary Service & Crematory, Stillwell Limited Inc., and Heather Squires (collectively "Respondents"), hereby move for appointment of a Hearing Officer, who has the power and authority for all further action on behalf of the Oklahoma Funeral Board with regard to Complaint No. 26-15 ("Complaint"), pursuant to 59 O.S. § 396.12f(F) and the Oklahoma Administrative Procedures Act. Respondents further seek to disqualify and recuse all members of the

Oklahoma Funeral Board (“Board”) from any further consideration or adjudication with regard to the Complaint after appointment of a neutral and qualified Hearing Officer as requested herein, pursuant to OAC 235:10-9-9(g) and 75 O.S. § 316 of the Oklahoma Administrative Procedures Act. Respondents are authorized to state that the Executive Director and Counsel for the Oklahoma Funeral Board are in agreement with and do not object to this Motion. In further support of Respondents’ Motion, they state as follows:

**PROPOSITION I  
APPOINTMENT OF A HEARING OFFICER**

Respondents move to have the Oklahoma Funeral Board appoint a neutral and qualified Hearing Officer with the power and authority to adjudicate the Complaint, accordingly, including any resolution thereof, pursuant to 59 O.S. § 396.12f(F), and the Oklahoma Administrative Procedures Act. Respondents seek appointment of a Hearing Officer due to the conflicts of interest that exist as to the Board as set forth in Proposition II, *infra*. Respondents request that the Hearing Officer appointed be neutral and qualified; Respondents further request that the Hearing Officer be a licensed attorney who has experience adjudicating administrative proceedings for the Oklahoma Funeral Board and/or other professional licensing administrative agencies.

**PROPOSITION II  
DISQUALIFICATION AND RECUSAL OF THE OKLAHOMA  
FUNERAL BOARD**

Respondents move to have the Board disqualified and recused from further consideration and adjudication as it relates to merits of the Complaint, because of the

Board's inability to provide a fair and impartial hearing and adjudication of the Complaint and because of the existing conflicts of interest. All of the licensed members of the Board are either current or former customers of Respondent Alpha & Omega or are a competitor to Respondent Alpha & Omega, and therefore, these members have a financial interest in the outcome of the hearing and therefore, should be recused from the proceedings related to the Complaint. With the recusal and disqualification of the licensed members of the Oklahoma Funeral Board, there are not enough members to satisfy the quorum obligations necessary to adjudicate the Complaint.

The Board is comprised of seven (7) members; two (2) of which are members of the general public. 59 O.S. § 396. The current Board members are Brent Matherly ("Matherly"), Tom Coble ("Coble"), Darin Corbett ("Corbett"), Glenn Dunn ("Dunn"), John Davenport ("Davenport"), Jeremy Sparks ("Sparks"), and Bart Watkins ("Watkins").

The five (5) members of the Board who are licensed by the Oklahoma Funeral Board are either a competitor of Respondent or use or have used the services of Respondent and therefore, a conflict of interest exists with regard to these members. As a result of the conflicts of interest recusal is warranted as to the five (5) licensed Board members; recusal of these five (5) Board members results in an insufficient number of members to establish a quorum.

Moreover, disqualification is warranted because the Board is disqualified from further adjudication of the Complaint, because on two (2) separate occasions the

Board was presented with a proposed Consent Order to resolve Complaint 26-15, specifically during its February 11, 2026, meeting and again during its March 12, 2026.

A proposed Consent Order was drafted and agreed upon by the Executive Director of the Oklahoma Funeral Board, counsel for the parties, and Respondents. The following members of the Board were present and considered the Consent Order to resolve the Complaint on February 11, 2026: Coble, Corbett, Davenport, Dunn, and Sparks; Matherly recused himself from consideration. *See Exhibit 1, Pertinent Portions of the Board's Minutes.* Only one (1) member of the Board was not present on February 11, 2026, to wit: Watkins. The Board deliberated the proposed Consent Order in Executive Session, and requested counsel for the parties to answer questions, and then excused counsel so that the Board could continue its deliberations. Once the regular meeting resumed, the Board voted to table the proposed Consent Order until its next meeting on March 12, 2026.

The proposed Consent Order was revised in an effort to address the perceived inquiries and concerns raised by the Board during the February 11, 2026, meeting. The revised proposed Consent Order was agreed upon by the Executive Director of the Oklahoma Funeral Board, counsel for the parties, and Respondents.

On March 12, 2026, the revised proposed Consent Order was presented and considered by the Board; the Consent Order was rejected. *See Exhibit 2, Pertinent Portions of the Notes from the March 12, 2026, Board meeting.* Watkins is the only member who was not present during either the February or March meeting. During

the March 12, 2026, meeting the Board was presented with and considered the revised Proposed Consent Order; the Board deliberated the Proposed Consent Order in Executive Session, and ultimately the Board voted to reject the revised Proposed Consent Order.

The information presented in the proposed Consent Orders was presented to resolve the Complaint without further action and it was agreed upon by the Executive Director of the Oklahoma Funeral Board, counsel for the parties, and Respondents.

The conflicts of interests that existed at the time of the Board's consideration proposed Consent Orders, appear to have further impacted and influenced the Board during its consideration, deliberation, and rejection of the proposed Consent Orders that had been approved and agreed to by the Executive Director and counsel for the Board, further highlighting the Board's inability to provide a fair and impartial hearing, pursuant to 75 O.S. § 316 and OAC 235:10-9-9.

The conflicts of interest that exist and the impact these conflicts of interests had during the consideration, deliberation, and ultimate rejection of the Consent Orders is apparent, and necessarily impairs the Board's ability "accord a fair and impartial hearing or consideration." 75 O.S. § 316.

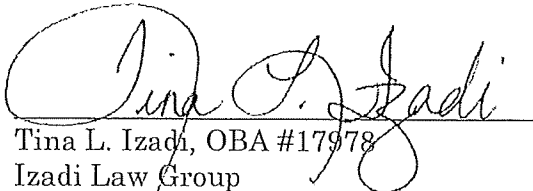
Once the members with conflicts of interest, including those who have deliberated and considered the proposed Consent Orders, are recused and disqualified, there is an insufficient number of members remaining to create a quorum to adjudicate the Complaint. *See* 59 O.S. § 396.22; OAC 235:10-9-9(d).

For the foregoing reasons, Respondents request recusal and disqualification of the members of the Board with conflicts of interest, including those who have considered and deliberated the proposed Consent Orders, from further consideration and adjudication on the merits of the Complaint after the Board has appointed a neutral and qualified Hearing Officer as set forth in Proposition I, *supra*.

**RELIEF REQUESTED**

Respondents request the Board assign and transfer the Complaint to a neutral and qualified Hearing Officer in all respects as it relates to the Complaint, including any resolution; Respondents further request recusal and disqualification of the Board from any further consideration regarding the merits of Complaint 26-15 as set forth herein.

Respectfully submitted,



Tina L. Izadi, OBA #17978  
Izadi Law Group  
16354 Muirfield Place, Suite B  
Edmond, OK 73013  
(O) 405-471-6492; (F) 405-562-5201  
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and

Larry A. Morgan, OBA #6395  
Morgan and Morgan, P.C.  
11912 N. Pennsylvania Ave., Suite D-1  
Oklahoma City, OK 73120-7830  
P: (405) 748-6200 / F: (405) 748-6061  
Email: larrymorgan@morganandmorganlaw.com

**Attorneys for Respondents Alpha & Omega  
Mortuary Service & Crematory, Stillwell Limited,  
Inc., and Heather Squires**

### DECLARATION

The undersigned counsel for Respondents hereby declares under penalty of perjury that the summary of the facts and circumstances contained in the foregoing motion are true, correct, and accurate to the best of her knowledge and that the foregoing motion sets forth the basis for disqualification as required by 75 O.S. § 316. This declaration was signed in Edmond, Oklahoma County, State of Oklahoma.

Dated this 26<sup>th</sup> day of June 2026.

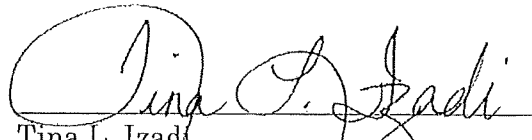
  
Tina L. Izadi, OBA No. 17978

### CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 26<sup>th</sup> day of June 2026, a true and correct copy of the foregoing was sent to and served on the following persons via email and/or via U.S. Mail, postage prepaid, to the addresses listed below:

Tyler Stiles, Executive Director  
Oklahoma Funeral Board  
3700 N. Classen Blvd., Ste. 175  
Oklahoma City, OK 73118  
Email: tyler.stiles@funeral.ok.gov

Joseph L. Ashbaker, OBA No. 19395  
Kylie Cooper, OBA No. 32758  
Office of Oklahoma Attorney General  
313 N.E. 21<sup>st</sup> Street  
Oklahoma City, OK 73105  
Email: joe.ashbaker@oag.ok.gov  
Email: kylie.cooper@oag.ok.gov

  
Tina L. Izadi