



OFFICE OF THE ATTORNEY GENERAL  
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION  
2023-32A

Kathy Hart, Executive Director  
Oklahoma State Board of Licensure for  
Professional Engineers and Land Surveyors  
220 N.E. 28th St., Ste. 120  
Oklahoma City, OK 73105

August 28, 2023

Re: Townsend, Case No. 2022-042

Dear Executive Director Hart:

This office has received your request for a written Attorney General Opinion regarding disciplinary action the State Board of Licensure for Professional Engineers and Land Surveyors intends to take in Case No. 2022-042 against Respondent Townsend.

Title 59, section 475.8(A) of the Oklahoma Statutes empowers the Board of Licensure for Professional Engineers and Land Surveyors (“Board”) to regulate the practice of engineering in the State of Oklahoma. It is “unlawful to practice or to offer to practice engineering . . . in this state . . . unless such person has been duly licensed or authorized.” 59 O.S.2021, § 457.1

Respondent is licensed by the Texas Board of Architectural Examiners (Texas Board). In 2009 and 2012, the Board of Governors of the Licensed Architects, Landscape Architects and Registered Interior Designers of Oklahoma found Respondent guilty of practicing or offering to practice architecture without a license and assessed administrative fines. Respondent failed to comply. In 2014, Respondent faced discipline and fines for offering and providing architectural services in Texas while their registration with the Texas Board was delinquent, and in 2015 for their unregistered practice in Oklahoma.

On April 30, 2023, the Board’s prosecutor brought formal charges against the Respondent, alleging that on February 22, 2021, Respondent prepared, signed, sealed, and issued the civil, structural, architectural, plumbing, mechanical and electrical design drawings for A New Child Care Facility for The Comanche Nation in Lawton, Oklahoma using his State of Texas Architects Seal despite never holding an Oklahoma Professional Engineers Certificate of Licensure to offer to practice and/or practice engineering in the State of Oklahoma.

Having heard clear and convincing evidence of Respondent’s guilt, the Board proposes to order Respondent to pay a \$10,000 administrative fine and order that Respondent cease and desist the practice of engineering in Oklahoma without a license. It further proposes to advise both the Board of Architects in the State of Texas and the client of its action, and recommend the clients enlist licensed, professional engineers review the engineering performed by Respondent for their project. The Board may reasonably believe the proposed action is necessary to deter future violations.

It is, therefore, the official opinion of the Attorney General that the proposed action taken by the State Board of Licensure for Professional Engineers and Land Surveyors is in accordance with the State's policy to protect public health, safety, and welfare.



ROB JOHNSON  
GENERAL COUNSEL