

**IN AND BEFORE THE STATE BOARD OF OSTEOPATHIC EXAMINERS
STATE OF OKLAHOMA**

**IN THE MATTER OF JOHN PHILLIP)
AGENT, D.O.,)
Osteopathic Medical License No.)
3341**

**MID-LEVEL EXCEPTION
REQUEST**

ORDER GRANTING MID-LEVEL EXCEPTION

This matter comes on for consideration before the Oklahoma State Board of Osteopathic Examiners ("Board") at a regular meeting of the Board on September 18, 2025. John Phillip Agent, D.O. ("Dr. Agent") appeared at this hearing and presented a Motion requesting an exception to supervise a family member pursuant to Oklahoma Administrative Code 510:10-4-3.

This Order is issued pursuant to the Oklahoma Osteopathic Medicine Act, 59 O.S. § 620 et. seq. and the Oklahoma Administrative Procedures Act, 75 O.S. § 250 et. seq.

The Board, after reviewing Dr. Agent's request, and being fully advised, enters this Order Granting authority to supervise his daughter, Chelsea Agent-Real, DNP, in her role at Mercy Clinic Sallisaw, with the condition that Dr. Agent re-appear if the practice situation with his daughter changes.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED by the Board that, for good cause shown, of Dr. Agent's Request for authority to supervise his daughter, Chelsea Agent-Real, DNP, in her role at Mercy Clinic Sallisaw, is GRANTED.

This Order is a public record and therefore subject to the Oklahoma Open Records Act.

IT IS SO ORDERED AND EFFECTIVE this 18th day of September, 2025.

Chelsey Gilbertson, D.O.

Chelsey Gilbertson, D.O. (Sep 22, 2025 18:29:52 CDT)

Chelsey D. Gilbertson, D.O.
Board President
State Board of Osteopathic Examiners

**IN AND BEFORE THE STATE BOARD OF OSTEOPATHIC EXAMINERS
STATE OF OKLAHOMA**

STATE OF OKLAHOMA, ex rel.,)	
STATE BOARD OF OSTEOPATHIC)	
EXAMINERS,)	
)	
Petitioners,)	
)	
vs.)	SURRENDER OF LICENSE
)	
LADD ATKINS, D.O.)	
Osteopathic Medicine License No. 4362)	

ORDER ACCEPTING SURRENDER OF LICENSE

This matter comes on for consideration before the Oklahoma State Board of Osteopathic Examiners ("Board") at a regular meeting of the Board on September 18, 2025. Ladd Atkins, D.O. ("Dr. Atkins") did not appear in person. Prior to the hearing, Dr. Atkins voluntarily provided the Board with an Affidavit For Surrender of License. (Exhibit A, Affidavit For Surrender of License).

This Order is issued pursuant to the Oklahoma Osteopathic Medicine Act, 59 O.S. § 620 *et. seq.* and the Oklahoma Administrative Procedures Act, 75 O.S. § 250 *et. seq.*

The Board, after reviewing Dr. Atkins Affidavit For Surrender of License, and being fully advised, enters this Order Accepting Surrender of License. This Surrender of Dr. Atkins license is accepted with the understanding that should Dr. Atkins re-apply for licensure in the State of Oklahoma in the future, the Board has the right to consider the facts surrounding the surrender.

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED by the Board that, for good cause shown, Dr. Atkins Affidavit For Surrender of License has been **ACCEPTED**. Dr. Atkins is no longer permitted to practice osteopathic medicine in the State of

Oklahoma.

This Order is a public record and therefore subject to the Oklahoma Open Records Act. Further, this Order may be reportable to the National Practitioner Data Bank ("NPDB") pursuant to federal law, including but not limited to, 45 CFR Part 60. Moreover, any violation of this Order may result in a referral to the Oklahoma Attorney General for the unauthorized practice of osteopathic medicine in the State of Oklahoma.

IT IS SO ORDERED AND EFFECTIVE this 18th day of September, 2025.

Chelsey Gilbertson, D.O.

Chelsey Gilbertson, D.O. (Sep 22, 2025 18:29:52 CDT)

Chelsey Gilbertson, D.O.

Board President

State Board of Osteopathic Examiners

AFFIDAVIT

For Surrender of License

STATE OF OKLAHOMA)
) ss.
COUNTY OF TULSA)

I, the undersigned Licensee [Licensee], after being duly sworn and under oath, attest that I am the holder of an Oklahoma license to practice osteopathic medicine [License] issued by the Oklahoma State Board of Osteopathic Examiners [Board]. I am voluntarily submitting this Affidavit For Surrender of License [Affidavit] to cease practicing Osteopathic Medicine in the state of Oklahoma. I request that the Board cancel my license to practice osteopathic medicine in the state of Oklahoma pursuant to Title 59 O.S. § 642. It is understood that my License may be considered for reinstatement upon compliance pursuant to Title 59 O.S. §§ 637,641, & 642. I acknowledge, upon cancellation, I will no longer be eligible to practice osteopathic medicine in the state of Oklahoma, and further state as follows:

1. I hereby surrender my certificate for License Number: 4362

2. I acknowledge that the purpose of my request for cancellation in Oklahoma is:
(Check all items that apply below)

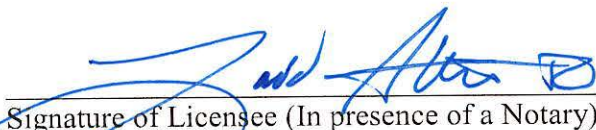
☐ I retired from the practice of osteopathic medicine effective: _____
Date

☒ I terminated my osteopathic medicine practice effective: 9/17/2025
Date

☐ I will continue practicing in these states under the following license numbers:

☐ I am informed that the Board has an open investigation regarding my conduct and acknowledge disciplinary action may be brought against me.

☐ I am aware a Complaint is filed against me and acknowledge the Board is seeking disciplinary action against me, the result up to and including license revocation.

 Signature of Licensee (In presence of a Notary) Printed Name Ladd C. Atkins

Subscribed and sworn to before me this 30th day of July, 20 25.
My Commission Expires:


(SEAL & NOTARY NUMBER)


NOTARY PUBLIC

**IN AND BEFORE THE STATE BOARD OF OSTEOPATHIC EXAMINERS
STATE OF OKLAHOMA**

STATE OF OKLAHOMA, ex rel.,)	
STATE BOARD OF OSTEOPATHIC)	
EXAMINERS,)	
)	
Petitioners,)	
)	
vs.)	SURRENDER OF LICENSE
)	
PAUL DILLAWAY, D.O.)	
Osteopathic Medicine License No. 9281)	

ORDER ACCEPTING SURRENDER OF LICENSE

This matter comes on for consideration before the Oklahoma State Board of Osteopathic Examiners ("Board") at a regular meeting of the Board on September 18, 2025. Paul Dillaway, D.O. ("Dr. Dillaway") did not appear in person. Prior to the hearing, Dr. Dillaway voluntarily provided the Board with an Affidavit For Surrender of License. (Exhibit A, Affidavit For Surrender of License).

This Order is issued pursuant to the Oklahoma Osteopathic Medicine Act, 59 O.S. § 620 *et. seq.* and the Oklahoma Administrative Procedures Act, 75 O.S. § 250 *et. seq.*

The Board, after reviewing Dr. Dillaway's Affidavit For Surrender of License, and being fully advised, enters this Order Accepting Surrender of License.

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED by the Board that, for good cause shown, Dr. Dillaway's Affidavit For Surrender of License has been **ACCEPTED**. Dr. Dillaway is no longer permitted to practice osteopathic medicine in the State of Oklahoma.

This Order is a public record and therefore subject to the Oklahoma Open Records Act. Further, this Order may be reportable to the National Practitioner Data Bank

("NPDB") pursuant to federal law, including but not limited to, 45 CFR Part 60. Moreover, any violation of this Order may result in a referral to the Oklahoma Attorney General for the unauthorized practice of osteopathic medicine in the State of Oklahoma.

IT IS SO ORDERED AND EFFECTIVE this 18th day of September, 2025.

Chelsey Gilbertson, D.O.

Chelsey Gilbertson, D.O. (Sep 22, 2025 18:29:52 CDT)

Chelsey Gilbertson, D.O.

Board President

State Board of Osteopathic Examiners

AFFIDAVIT
For Surrender of License

STATE OF Oklahoma)
) ss.
COUNTY OF _____)

I, the undersigned Licensee [Licensee], after being duly sworn and under oath, attest that I am the holder of an Oklahoma license to practice osteopathic medicine [License] issued by the Oklahoma State Board of Osteopathic Examiners [Board]. I am voluntarily submitting this Affidavit For Surrender of License [Affidavit] to cease practicing Osteopathic Medicine in the state of Oklahoma. I request that the Board cancel my license to practice osteopathic medicine in the state of Oklahoma pursuant to Title 59 O.S. § 642. It is understood that my License may be considered for reinstatement upon compliance pursuant to Title 59 O.S. §§ 637,641, & 642. I acknowledge, upon cancellation, I will no longer be eligible to practice osteopathic medicine in the state of Oklahoma, and further state as follows:

1. I hereby surrender my certificate for License Number: 9281
2. I acknowledge that the purpose of my request for cancellation in Oklahoma is:
(Check all items that apply below)

☐ I retired from the practice of osteopathic medicine effective: _____
Date

☐ I terminated my osteopathic medicine practice effective: _____
Date

☒ I will continue practicing in these states under the following license numbers:

Arizona - 006830, Florida - 0519513

☐ I am informed that the Board has an open investigation regarding my conduct and acknowledge disciplinary action may be brought against me.

☐ I am aware a Complaint is filed against me and acknowledge the Board is seeking disciplinary action against me, the result up to and including license revocation.

[Signature] Signature of Licensee (In presence of a Notary) Paul Dinaway Printed Name

Subscribed and sworn to before me this 24 day of August, 20 2025.
My Commission Expires _____



[Signature]
NOTARY PUBLIC

wrongdoing, and the Board found by clear and convincing evidence that he failed to provide call coverage, falsified medical records, and committed patient abandonment.

4. As a result, the Board levied a one-year probation and required Dr. Lehman to complete medical ethics training, proper medical record, charting courses, address any issues raised by a CPEP evaluation, instruct hospitals where he enjoyed privileges to report any incidents to the Board, and costs.
5. Dr. Lehman received an order terminating probation on September 22, 2011, for good cause shown, three months prior to completion of a full calendar year.
6. Dr. Lehman became board-certified in obstetrics and gynecology in 2011 but allowed that certification to lapse in 2016. He has not renewed board certification since that time.

Case 2021-201

7. On December 12, 2024 Dr. Lehman appeared before the Board for a hearing in Case 2021-201.
8. On December 12, 2024 the Board found that Dr. Lehman, on four (4) separate occasions between 2017 and 2020, practiced outside the standard of care and exceeded the scope of his practice and training in managing patients' known uterine malignancies by knowingly performing the incorrect procedure. These incidents put each patient's long-term survival at risk.
9. The Board issued an Interim Order finding Dr. Lehman violated the Oklahoma Osteopathic Medicine Act ("Act") and directed Dr. Lehman to have a competency evaluation within 6 months at his own expense.
10. All findings of fact and conclusions of law set forth in the Interim Order for case 2021-201 dated December 12, 2024 are hereby incorporated herein by reference with the same force and effect.

Case 2024-111

11. On June 19, 2025 Dr. Lehman appeared before the Board for a hearing in Case 2024-111.

12. Dr. Lehman was initially suspended for fourteen days from Integris Health Woodward Hospital effective June 6, 2024. The suspension stemmed from a review of multiple cases of sub-par OBGYN care provided at the time of multiple births.
13. Dr. Lehman's suspension from the hospital was continued on June 17, 2024.
14. Dr. Lehman applied for licensure renewal on July 2, 2024. He did not report his suspension to the Board or disclose his suspension on his renewal application.
15. On June 19, 2025, evidence was presented to the Board regarding violations in four separate cases.
16. The Board entered an Interim Order finding Dr. Lehman to be in violation of the Act. The Interim Order temporarily suspended Dr. Lehman license to practice osteopathic medicine. It further ordered the KSTAR (Knowledge, Skills, Training, Assessment and Research) evaluation to be completed at his expense for Board consideration.
17. All findings of fact and conclusions of law set forth in the Interim Order for case 2024-111 dated June 19, 2025, are hereby incorporated herein by reference with the same force and effect.
18. The Board finds the following in regard to each of the four cases:
 - a. Patient K.O.
 - i. Dr. Lehman exceeded the maximum time limit for utilizing the kiwi device and his charting was inadequate. The baby was delivered flaccid, nonbreathing and unresponsive. Dr. Lehman's deviation from the standard of care contributed to results of poor fetal outcome.
 - b. Patient T.B.
 - i. Dr. Lehman had inadequate documentation, and violated the standard of care by improperly administering fetal steroids and a magnesium sulfate drip, as well as delaying a cesarean section without proper justification.
 - c. Patient M.D.
 - i. Dr. Lehman maintained an inadequate medical record and did not adhere to widely accepted guidelines suggesting a lower target level of hemoglobin

as a goal for post transfusion in a non-hemorrhaging patient who is also not at high risk for coronary artery disease.

d. Patient L.I.

- i. Dr. Lehman waited over thirty-nine (39) hours to see Patient L.I. after being made aware she had presented to Woodward Hospital for premature membrane rupture and contractions. Dr. Lehman used a vacuum device to assist with delivery. Dr. Lehman also had inadequate documentation in the medical record. The infant was found to have suffered from chorioamnionitis, pneumonia, and skull fractures and died within a day of birth. Dr. Lehman's deviation from the standard of care contributed to the outcome.

Joint Findings

19. The Board ordered in both 2021-201 and 2024-111 that Dr. Lehman have an evaluation by KSTAR and the findings be reported to the Board.
20. The KSTAR report was received, reviewed and considered.

CONCLUSIONS OF LAW

21. The Board has jurisdiction over the subject matter and is a duly authorized agency of the State of Oklahoma empowered to license and oversee the activities of osteopathic physicians in the State of Oklahoma. 59 O.S. § 620 et seq. and Okla. Admin. Code §§ 510: 1-1 -1 et seq.
22. The Board is authorized to suspend, revoke or order any other appropriate conditions against the license of any osteopathic physician holding a license to practice medicine in the State of Oklahoma for unprofessional conduct. 59 O.S. §§ 637.1.
23. The Board finds by clear and convincing evidence that Dr. Lehman is in violation of the Oklahoma Osteopathic Medicine Act (the "Act"), Tit. 59 O.S. § 637(A)(1), (A)(2)(f) and (A)(4), which states:

- A. The State Board of Osteopathic Examiners may ... suspend or revoke any license issued or reinstated by the Board upon proof that the applicant or holder of such a license:
1. Has obtained a ...license renewal ...through... deception, [or] misrepresentation ... or has been granted a ...license renewal ...based upon material mistake of fact;
 2. Has engaged in the use or employment of ... unethical conduct or unprofessional conduct, as may be determined by the Board, in the performance of the functions or duties of an osteopathic physician, including but not limited to the follow:
 - f. Acting in a manner which results in final disciplinary action by any professional society or association or hospital or medical staff of such hospital in this or any other state, whether agreed to voluntarily or not, if the action was in any way related to professional conduct professional competence, malpractice or any other violation of the Oklahoma Osteopathic Medicine Act[.]
 4. Has engaged in repeated acts of negligence, malpractice or incompetence[.]
24. The Board finds the following:
- a. In case 2021-201 Dr. Lehman is found to have violated the Act by deviating from the standard of care four times, constituting four instances of malpractice.
 - b. In case 2024-111 Dr. Lehman is found to have violated the Act as follows:
 - i. Regarding Patient K.O. Dr. Lehman deviated from the standard of care constituting malpractice.
 - ii. Regarding Patient T.B. Dr. Lehman deviated from the standard of care constituting incompetence.
 - iii. Regarding Patient M.D. Dr. Lehman deviated from the standard of care constituting incompetence.
 - iv. Regarding Patient L.I. Dr. Lehman deviated from the standard of care constituting negligence.


ORDER

IT IS HEREBY ORDERED, ADJUDGED AND DECREED by the Oklahoma State Board of Osteopathic Examiners the following: Dr. Lehman's license to practice osteopathic medicine in the state of Oklahoma shall remain **SUSPENDED** pending the completion of the following terms:

1. Dr. Lehman must pass a board approved certifying exam in obstetrics and gynecology.
2. Dr. Lehman must pass the KSTAR ethics exam with a score greater than 75%.
3. Dr. Lehman must pass the KSTAR pharmacology exam with a score greater than 75%.
4. Dr. Lehman must complete 100 hours of approved CME in his specialty area annually for the duration of this Order or until further Order of the Board.
5. Dr. Lehman shall sign any and all authorizations necessary to release exam results to the Board.
6. Following receipt of the requirements outlined in paragraphs 1-5, Dr. Lehman may petition the Board to appear at the next scheduled meeting for further consideration regarding his suspension.

This Order is a public record and therefore subject to the Oklahoma Open Records Act. Further, this Order may be reportable to the National Practitioner Data Bank ("NPDB") pursuant to federal law, including but not limited to, 45 CFR Part 60.

IT IS HEREBY ORDERED AND EFFECTIVE this 18th day of September 2025.


Katie Templeton, J.D. (Sep 23, 2025 16:26:39 CDT)
Katie Templeton, J.D.
Vice President
State Board of Osteopathic Examiners

Act.

IT IS HEREBY ORDERED AND EFFECTIVE this 18th day of September, 2025.

Chelsey Gilbertson, D.O.

Chelsey Gilbertson, D.O. (Sep 22, 2025 18:29:52 CDT)

Chelsey D. Gilbertson, D.O.

Board President

State Board of Osteopathic Examiners

**IN AND BEFORE THE STATE BOARD OF OSTEOPATHIC EXAMINERS
STATE OF OKLAHOMA**

IN THE MATTER OF MATTHEW)	MID-LEVEL EXCEPTION
PRIEST, D.O.,)	REQUEST
Osteopathic Medical License No.)	
7124		

FINAL ORDER GRANTING MID-LEVEL EXCEPTION

This matter comes on for consideration before the Oklahoma State Board of Osteopathic Examiners ("Board") at a regular meeting of the Board on September 18, 2025. Matthew Priest, D.O. ("Dr. Priest") appeared at this hearing and presented an updated Motion detailing his plan for supervision of up to ten (10) Mid-level practitioners pursuant to Oklahoma Administrative Code 510:10-4-3.

This Order is issued pursuant to the Oklahoma Osteopathic Medicine Act, 59 O.S. § 620 et. seq. and the Oklahoma Administrative Procedures Act, 75 O.S. § 250 et. seq.

The Board, after reviewing Dr. Priest's updated request with the additional information requested at the June 2025 meeting, and being fully advised, enters this Final Order Granting authority to supervise up to ten (10) Mid-level practitioners provided he fully complies with the supervision requirements as outlined in OAC 510:10-4-3.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED by the Board that, for good cause shown, of Dr. Priest's Request for authority to supervise up to ten (10) Mid-level practitioners is GRANTED.

This Order is a public record and therefore subject to the Oklahoma Open Records Act.

IT IS SO ORDERED AND EFFECTIVE this 18th day of September, 2025.

Chelsey Gilbertson, D.O.

Chelsey Gilbertson, D.O. (Sep 22, 2025 18:29:52 CDT)

Chelsey D. Gilbertson, D.O.
Board President
State Board of Osteopathic Examiners

**IN THE MATTER OF TRISZA RAY,)
D.O., (Osteopathic Medical License) Case No. OSBOE-2021-048
No. 4143))**

ORDER APPROVING PRECEPTOR AND RE-ENTRY PLAN
Trisza Ray, D.O. (4143)
OSBOE-2021-048
Page 1 of 2

8. Dr. Ray will be assessed an ongoing monthly Administrative Maintenance fee of one hundred dollars (\$100), due by the first day of each month and continued monthly during the pendency of any active and ongoing Board Order.

All other restrictions from Dr. Ray's June 2025 Order Granting Reinstatement of License with Restrictions will remain in effect.

Any violation of this Order may result in discipline of Dr. Ray's license to practice osteopathic medicine in the State of Oklahoma.

This Order is a public record and therefore subject to the Oklahoma Open Records Act. Further, This Order may be reportable to the National Practitioner Data Bank ("NPDB") pursuant to federal law, including but not limited to, 45 CFR Part 60.

Moreover, as facts may indicate any violation of this Order may result in a referral to the Oklahoma Attorney General for the unauthorized practice of osteopathic medicine in the State of Oklahoma.

IT IS HEREBY ORDERED AND EFFECTIVE this 18th day of September, 2025.

Chelsey Gilbertson, D.O.

Chelsey Gilbertson, D.O. (Sep 22, 2025 18:29:52 CDT)

Chelsey Gilbertson, D.O.
Board President
State Board of Osteopathic Examiners

**IN AND BEFORE THE STATE BOARD OF OSTEOPATHIC EXAMINERS
STATE OF OKLAHOMA**

STATE OF OKLAHOMA, ex rel.,
STATE BOARD OF OSTEOPATHIC
EXAMINERS,

Petitioners,

vs.

STEPHEN TREADWELL, D.O.
Osteopathic Medicine License No. 2909

Respondent.

Case No.: OSBOE-2025-070

CONSENT ORDER

The State of Oklahoma, *ex rel.* Oklahoma State Board of Osteopathic Examiners (“Petitioner” or the “Board”), by and through the undersigned counsel for the Board, Sean M. Sanders, and Stephen Treadwell, D.O. (“Respondent”), Oklahoma license no. 2909, who appears in through counsel Elizabeth A. “Libby” Scott, (collectively, the “Parties”), offer this Consent Order (the “Order”) for acceptance by the Board.

By voluntarily entering into this Order, Respondent admits to certain of the allegations herein contained and further acknowledges that a hearing before the Board could result in some sanction under the Oklahoma Osteopathic Medicine Act (“Act”). 59 O.S. § 620 *et seq.*

Respondent, Stephen Treadwell, D.O., states that he is of sound mind and is not under the influence of, or impaired by, any medication or drug and that he fully recognizes his right to appear before the Board for an evidentiary hearing on the allegations made against him. Respondent hereby voluntarily waives his right to a full hearing, submits to the jurisdiction of the Board, and agrees to abide by the terms and conditions of this Order. Respondent acknowledges he has read and understands the terms and conditions stated herein, and the Order may be reviewed and discussed with him by legal counsel prior to execution.

If the Board does not accept this Order, the Parties stipulate it shall be regarded as null and void, and Petitioner shall not use any admission made by Respondent herein against him in any subsequent disciplinary hearing before the Board or otherwise. If the Board does not accept this Order, Respondent will be free to defend himself, and no inferences would be drawn from Respondent’s willingness to have this Order accepted by the Board. The Parties further stipulate that neither the presentation of this Order nor the Board’s consideration of this Order shall be deemed to have unfairly or illegally prejudiced the Board or its individual members and, therefore, shall not constitute grounds for precluding the Board nor any individual Board member from further participation in proceedings related to the matters set forth herein.

FINDINGS OF FACT

The Petitioner and Respondent each stipulate and agree as follows:

1. Stephen Treadwell, D.O., is the holder of a license to practice as an osteopathic physician in the State of Oklahoma, license number 2909.

2. Dr. Treadwell received his license to practice as an osteopathic physician in Oklahoma from the Board in July of 1990 and primarily engages in the practice of Family Medicine and acts as a Primary Care Physician in Healdton, Oklahoma.

3. At all times relevant to this proceeding, Dr. Treadwell practiced medicine and is the sole owner of "Physicians Clinic", in Healdton, Oklahoma.

4. On June 2, 2025, Oklahoma State Board of Osteopathic Examiners lead investigator, Elizabeth Fullbright, was informed of an anonymous complaint which stated Dr. Treadwell was allowing someone unlicensed to practice medicine in Oklahoma to treat patients without supervision at Dr. Treadwell's clinic.

5. An investigation into the complaint commenced that evening after multiple attempts had been made to reach Dr. Treadwell via phone to no avail.

6. Through investigative efforts it was discovered that Dr. Treadwell hired Jaine Queiroz in the latter part of May 2025.

7. Jaine Queiroz is a foreign doctor not licensed to practice in the United States of America.

8. Further, it was discovered that Dr. Treadwell made several knowingly false or deceptive statements regarding the qualifications and title of Jaine Queiroz on multiple platforms, including but not limited to the Physicians Clinic Website, which were deceptive or misleading to the public...regarding the training and license under which Jaine Queiroz was authorized to

practice.

9. Additionally, it was discovered that Dr. Treadwell made advertisements on his website which included knowingly false and deceptive statements with regard to his personal board certifications and status.

10. Dr. Treadwell improperly delegated professional responsibilities to Jaine Queiroz by allowing her to conduct activities she was not qualified by licensure to perform.

11. Dr. Treadwell acknowledges that a hearing before the Board could result in a finding that he has engaged in the use or employment of unethical conduct or unprofessional conduct... in the performance of the functions or duties of an osteopathic physician.

CONCLUSIONS OF LAW

12. The Board has jurisdiction over the subject matter and is a duly authorized agency of the State of Oklahoma empowered to license and oversee the activities of osteopathic physicians in the State of Oklahoma. 59 O.S. § 620 et seq. and Okla. Admin. Code §§ 510: 1-1 -1 et seq.

13. Pursuant to the provisions of 59 O.S. §§ 637 and 637.1, the Board is authorized to institute appropriate disciplinary action against any licensed osteopathic physician who violates the provisions of the Act.

14. Pursuant to the provisions of the Oklahoma Administrative Procedure Act, “unless precluded by law, informal disposition may be made of any individual proceeding by stipulation, agreed settlement, or consent order.” 75 O.S. § 309(E).

15. Based on the foregoing, the Board finds as follows:

- a. Dr. Treadwell has made several knowingly false or deceptive statements regarding the qualifications and title of Jaine Queiroz on multiple platforms, including but not limited to the Physicians Clinic Website, which were deceptive or misleading to the public...regarding the training and license under which Jaine Queiroz was authorized to practice, violative of 59 O.S. § 752.2(G) et seq;

- b. Dr. Treadwell has made advertisements on his website which included knowingly false and deceptive statements with regard to his personal board certifications and status, violative of 59 O.S. § 637(A)(9);
- c. Dr. Treadwell improperly delegated professional responsibilities to Jaine Queiroz by allowing her to conduct activities she was not qualified by licensure to perform violative of 59 O.S. § 637(A)(2)(d);
- d. Dr. Treadwell acknowledges that a hearing before the Board could result in a finding that he has engaged in the use or employment of unethical conduct or unprofessional conduct... in the performance of the functions or duties of an osteopathic physician violative of 59 O.S. § 637(A)(2);
- e. Dr. Treadwell voluntarily agrees to waive his right to a hearing and enter this Consent Order;
- f. Dr. Treadwell and the Board Prosecutor agree to the terms of this Consent Order and move for the Board to adopt and enter the same.

ORDERS

IT IS THEREFORE ORDERED by the Oklahoma State Board of Osteopathic Examiners as follows:

- 16. The Board hereby adopts the agreement of the Parties in this Consent Order, including the Findings of Fact and Conclusions of Law stated herein.
- 17. Dr. Treadwell is Ordered and shall comply with the following terms and conditions:
 - a. In relation to the violation of 59 O.S. § 752.2(G) et seq, Dr. Treadwell will pay a fine of five-thousand dollars (\$5,000.00) payable in even monthly payments for a term of eighteen (18) months, beginning October 18, 2025;
 - b. In relation to the violation of 59 O.S. § 637(A)(9), Dr. Treadwell will pay a fine of one thousand dollars (\$1,000.00) payable in even monthly payments for a term of eighteen (18) months, beginning October 18, 2025;
 - c. In relation to the violation of 59 O.S. § 637(A)(2)(d), Dr. Treadwell agrees to attend "Delegation to medical assistants: Risks, rewards, and safety strategies" and "Delegation & Supervision: Case Studies and Hot Topics" which are CME courses totaling three (3) credit hours, hosted by the Texas Medical Liability Trust, within the next twelve (12 months). Upon completion, Dr. Treadwell shall submit reports/evidence of satisfactory completion and a certificate of attendance within fourteen (14) days of completion for each course individually;

- d. In relation to the acknowledgment that a hearing by the Board could find Dr. Treadwell to be in violation of 59 O.S. § 637(A)(2), Dr. Treadwell agrees to complete a full assessment by Dr. Rojas and adhere completely to the findings and suggestions of the assessment.
- e. Dr. Treadwell agrees to a period of five (5) years of monitoring, which includes but is not limited to quarterly unannounced audits, and the following conditions:
 - i. That Dr. Treadwell may be required to appear before the Board, in person during the pendency of this monitoring or as requested by the Board. At said appearances, Order(s) may be amended;
 - ii. Dr. Treadwell will be assessed an ongoing monthly Administrative Maintenance fee of one hundred dollars (\$100.00) due by the eighteenth (18th) day of each month and continued monthly during the pendency of the monitoring terms;
 - iii. Dr. Treadwell will complete the Compliance Information Request Form (CIF) and submit it to Board Staff within ten (10) days of issuance of this Order. In the event there is a change to the information contained in the CIF, Dr. Treadwell shall submit an updated CIF to the Board within ten (10) days of any such change;
 - iv. Board staff shall have oversight of this Order on behalf of the Board, and the authority to direct Dr. Treadwell to attend meetings, provide urine drug tests if requested, and to provide any and all reports, evaluations, assessments, and/or documents, relevant to this matter, including but not limited to, the signing of any authorizations necessary for the release of any and all evaluations/reports directly to the Board;
 - v. That Dr. Treadwell may utilize their right to consult legal counsel in connection with this inquiry by the Board, this Order, or any other inquiry by the Board;
 - vi. That Dr. Treadwell is required to notify the Board within seven (7) days of any changes to legal counsel;
 - vii. That Dr. Treadwell is required to notify the Board within seven (7) days of any changes to his residential address, office email address, practice address, and/or his cell phone number;
 - viii. That Dr. Treadwell renews his license yearly as required by the Board's statutes and rules. Failure to renew your license could result in cancellation by the Board;
 - ix. That Dr. Treadwell maintain compliance with continuing medical education ("CME") credits as required by the Board's statutes and rules;

- x. In the event Dr. Treadwell surrenders his Oklahoma license to practice osteopathic medicine, the terms and conditions of this Order shall be tolled.
- f. Dr. Treadwell shall bear unforeseen financial costs of any expenses incurred from this Order.
- g. Dr. Treadwell shall be responsible and bear costs of Three-Thousand Five-Hundred Dollars and Eighty-Three cents (\$3,500.83) associated with the investigation. Total to be repaid eighteen (18) months from the date of this Order.
- 18. This Order imposes no period of probation on Dr. Treadwell's license.
- 19. A copy of this Order shall be provided to Respondent as soon as it is processed.
- 20. Any violation of this Order may result in further discipline of Dr. Treadwell's license to practice osteopathic medicine in the State of Oklahoma.


This Order is a public record and therefore subject to the Oklahoma Open Records Act. Further, this Order may be reportable to the National Practitioner Data Bank pursuant to federal law, including but not limited to, 45 CFR Part 60.

IT IS SO ORDERED AND EFFECTIVE this 18 day of September, 2025.

Chelsey Gilbertson, D.O.

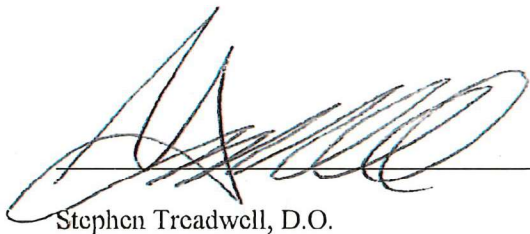
Chelsey Gilbertson, D.O. (Sep 22, 2025 18:29:52 CDT)

Chelsey D. Gilbertson, D.O.
OSBOE President



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PROSECUTOR FOR PETITIONER



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(Respondent)



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