

**BEFORE THE OKLAHOMA STATE BOARD OF LICENSURE FOR
PROFESSIONAL ENGINEERS AND LAND SURVEYORS**

STATE OF OKLAHOMA *ex rel.* OKLAHOMA)
STATE BOARD OF LICENSURE FOR)
PROFESSIONAL ENGINEERS AND LAND)
SURVEYORS,)

Complainant,)

vs.)

Name: Ronald Jason Keller)
Certificate of Licensure No.: None)
Address: 5066 North Lariat Drive)
Castle Rock, CO 80108)

Respondent.)

FILED

AUG 18 2022

OKLA. BOARD OF LIC. FOR
PROF. ENGRS. & LAND SURVEYORS

Case No. 2022-051

FORMAL NOTICE OF CHARGES

COMES NOW the Oklahoma State Board of Licensure for Professional Engineers and Land Surveyors (hereinafter the "Board") by and through its attorney, Robert A. Manchester, IV, and based upon the recommendation of the Board's Investigation Committee, its investigator and as ordered by the Board, brings this Formal Notice of Charges against the above named Respondent, Ronald Jason Keller ("Keller").

NOTICE OF HEARING

1. On September 22, 2022 the Board will be in session at 9:00 o'clock a.m. at 220 N.E. 28th Street, Oklahoma City, Oklahoma, at which time this Formal Notice of Charges will be considered by the Board and a formal fact finding hearing will be held pursuant to Oklahoma Administrative Procedures Act, 75 O.S. § 301, *et seq.*, the Statutes Regulating Professional Engineering and Land Surveying, 59 O.S. § 475.1 *et seq.*, and the duly promulgated Rules of the Board OAC § 245:2 *et seq.*

2. Respondent, in accordance with the above mentioned statutes and rules, has the right to appear personally or to be represented by an attorney and will be afforded the opportunity to respond, compel the testimony of witnesses, present evidence, and argue all issues involved.

3. Respondent is ordered by the Board to appear at said hearing on said date. If a Respondent is not present in person or through legal counsel, then the proceeding will be held in the absence of such Respondent, and the Board, in its discretion, may summarily take appropriate action as authorized by law. The Board will notify the absent Respondent of its final decision in writing.

JURISDICTION

Jurisdiction for this Formal Complaint is based upon:

4. The statutes regulating Professional Engineering and Land Surveying, 59 O.S. § 475.1 *et seq.*

5. The Rules of the Oklahoma State Board of Licensure for Professional Engineers and Land Surveyors (OAC § 245:2 *et seq.*).

STATEMENT OF ALLEGATIONS/CHARGES AGAINST THE RESPONDENT

It is alleged that Respondent has violated 59 O.S. § 475.1 *et seq.* and the Board Rules (OAC § 245:2 *et seq.*) as follows:

6. On November 9, 2021, the Board filed a Formal Notice of Charges against Keller in Board Case No. 2021-067.

7. The charges against Keller, in Case No. 2021-067, included his failure to submit a complete permanent P.E. Certificate of Licensure within thirty (30) days of the date of the issuance of a temporary license with all required properly completed forms and fees, (Count I) in violation of 59 O.S. §§ 475.18(A)(4) and 475.22(2)(a) and OAC § 245:15-3-10(a)(1) and failure to meet the

requirements of being in Responsible Charge of the work which was prepared by unlicensed persons at NEI, and ultimately reviewed, signed and sealed by Keller, (Count II) in violation of 59 O.S. § 475.18 (A)(10) and OAC § 245:15-17-2(a)(c) and (e).

8. On December 10, 2021, Keller and the Board entered into a Consent Order in Case No. 2021-067, in which Keller was found guilty of failure to submit a complete permanent P.E. Certificate of Licensure within thirty (30) days of the date of the issuance of a temporary license with all required properly completed forms and fees (Count I) and failure to meet the requirements of being in Responsible Charge of the work which was prepared by unlicensed persons at NEI and ultimately reviewed, signed and sealed by Keller, (Count II).

9. In addition to the finding of guilt, Keller was ordered to pay an administrative penalty of One Thousand Dollars (\$1,000.00) for Count I, and One Thousand Dollars (\$1,000.00) for Count II, which was to be paid within sixty (60) days of the filing of the Consent Order on December 10, 2021, (February 10, 2022). Keller was further ordered to Cease & Desist from offering to practice and/or practice of engineering in the State of Oklahoma until such time as he has been issued a P.E. Certificate of Licensure in accordance with the laws of the State of Oklahoma.

10. Soon after December 10, 2021, Keller received a mailing from the Board Staff containing the signed and filed copy of the Consent Order and instructions regarding payment of the administrative fine.

11. On February 16, 2022, Board Staff notified Keller, via Regular and Certified Mail, that the \$2,000.00 administrative penalty assessed in Case No. 2021-067 was past due and to avoid the possibility of additional charges being filed to remit full payment of the administrative penalty immediately.

12. As of the date of the filing of this Formal Notice of Charges, the administrative penalties, due on February 10, 2022, have not been paid by the Respondent.

COUNT I

The Allegations contained in the Statement of Allegations/Charges Against Respondent above are incorporated herein by reference.

13. Keller has failed to comply with the agreed terms of the Consent Order in Board Case No. 2021-067.

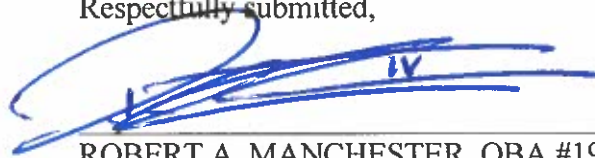
14. Keller is, therefore, guilty of violating the provisions of 59 O.S. § 475.18(A)(9) by failing to comply with the terms imposed by the Board and agreed to by Keller and is, therefore, subject to and should be assessed the Administrative Penalties set forth in 59 O.S. § 475.20(B) and OAC § 245:15-23-3 and 18.

REQUESTED FINDINGS OF THE BOARD AND PENALTY

The undersigned requests the Board, after considering all the testimony, evidence and argument, to find:

1. Respondent is in violation of any or all of the aforementioned statutes and rules.
2. That appropriate action be taken against Respondent, which may include:
 - A. An Administrative Penalty;
 - B. Reprimand;
 - C. Censure;
 - D. Suspension;
 - E. Revocation;
 - F. Such other action as the Board deems appropriate.

Respectfully submitted,



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