



OKLAHOMA STATE COURTS NETWORK

[Previous Case](#) [Top Of Index](#) [This Point in Index](#) [Citationize](#) [Next Case](#)

STATE BOARD OF EXAMINERS OF CERTIFIED COURTROOM INTERPRETERS v. PEREZ

2026 OK 55

Case Number: 123479

Decided: 06/30/2026

SUPREME COURT OF THE STATE OF OKLAHOMA

Cite as: 2026 OK 55, __ P.3d __

NOTICE: THIS OPINION HAS NOT BEEN RELEASED FOR PUBLICATION. UNTIL RELEASED, IT IS SUBJECT TO
REVISION OR WITHDRAWAL.

The State of Oklahoma ex rel. State Board Of Examiners of Certified Courtroom Interpreters, Complainant,
v.
Nathalie Perez, Respondent

CERTIFIED COURTROOM INTERPRETER DISCIPLINARY PROCEEDING

¶0 The State Board of Examiners of Certified Courtroom Interpreters brought a formal complaint against Nathalie Perez, Respondent, a registered courtroom interpreter, alleging grounds for professional discipline. Following a disciplinary hearing, the Board found sufficient basis for discipline and recommended that this Court revoke Respondent's enrollment as a registered courtroom interpreter.

RESPONDENT'S ENROLLMENT AS A REGISTERED COURTROOM INTERPRETER IS SUSPENDED.

Robert H. Jaques, Ada, Oklahoma, for Nathalie Perez, Respondent.

OPINION

DARBY, J.:

¶ 1 This case involves the discipline of a courtroom interpreter. Nathalie Perez, Respondent, has been a registered courtroom interpreter in the Spanish language since November 23, 2015. See *In re: Enrollment of Registered Ctrm. Interpreters*, SCAD-2015-86. Respondent is subject to the Rules Governing Disciplinary Proceedings of the State Board of Examiners of Certified Courtroom Interpreters (RGDP-CI). See 20 O.S.2025, ch. 23, App. III, Rule 1. Respondent does not have any prior disciplinary history. The verified complaint and notice of hearing in this matter was served on July 28, 2025. See State's Ex. 2.

¶ 2 The State Board of Examiners of Certified Courtroom Interpreters determines levels of credentials for courtroom interpreters in this state, makes recommendations to this Court for official enrollment as courtroom interpreters, and conducts proceedings in order to make recommendations to this Court regarding suspension or revocation of enrollment. 20 O.S.2025, § 1702; see also *Rs. of the State Brd. Of Examiners of Certified Ctrm. Interpreters*, 20 O.S., ch. 23, App. II, Rules 1, 2, 16, and 18. Grounds for proceedings for suspension or revocation

include, but are not limited to, "misrepresentation in obtaining an Oklahoma courtroom interpreter credential" and "fraud, gross incompetence, or gross or habitual neglect of duty." See 20 O.S.2025, § 1702(A)(5)(b) & (d); ¹ see also RGDP-CI, 20 O.S.2025, ch. 23, App. III, Rule 2(b) &(d). ²

¶ 3 Within 15 days of holding the hearing, the Board issues a written report with findings of fact and conclusions of law and makes its recommendation regarding discipline. RGDP-CI, 20 O.S.2025, ch. 23, App. III, Rule 6(d). The Board then files the complete record of the proceedings with this Court, consisting of the complaint; the Board's written report and recommendation and proof of service thereof; any other pleadings; a transcript, if one was made; and all exhibits offered at the hearing. RGDP-CI 7(a). Either party may request that a transcript of the proceedings be kept. See RGDP-CI 6(b). The parties may file briefs contesting the recommendation. See RGDP-CI 7(c). This Court then has full discretion to adopt or reject the recommendations in whole or in part, or make any other disposition we deem proper. See RGDP-CI 7(d).

¶ 4 We review the case before us on the record submitted, which consists of the complaint; the Board's written report and recommendation and proof of service thereof; Respondent's request to participate telephonically at the hearing; and all exhibits offered at the hearing. There was no transcript made or provided. We did not request the audio recording that was mentioned in the Notice of Completion and Transmittal of the Record for Review by the Supreme Court because audio recordings do not appear to be contemplated as part of the appellate record under the rules. See RGDP-CI 7(a). Neither party filed a brief.

¶ 5 Courtroom Interpreters are required to submit an annual renewal form and fee on or before February 15 of each year. See Rs. of the State Brd. of Examiners of Certified Crtrm. Interpreters, 20 O.S.2025, ch. 23, app. II, R. 18(b). Courtroom interpreters are required to complete eight hours of continuing education per calendar year. *Id.*, Rule 19(a). Rule 19(b) provides two exceptions whereby a courtroom interpreter may seek exemption from the continuing education requirements:

- 1) The interpreter was a member of the armed forces on full-time active duty during the entire calendar year for which the interpreter seeks an exemption; or
- 2) A medical condition has prevented the interpreter from working as an interpreter and completing continuing education for the calendar year for which the interpreter seeks an exemption. Written verification by a licensed physician must accompany such an exemption request.

Rs. of the State Brd. Of Examiners of Certified Crtrm. Interpreters, 20 O.S.2025, ch. 23, app. II, R. 19(b)(1)&(2). Beyond those, Rule 18(h) ³ allows an interpreter to pursue hardship exceptions when renewing their certificate.

¶ 6 On January 24, 2025, Respondent submitted her 2025 Annual Renewal Form wherein she requested exemption from continuing education requirements by filling in her name and checking the box for the statement: "I, Nathalie Perez, hereby declare that I am not required by the provisions of 20 O.S. § 1704 to file an Annual Report of Compliance for calendar year 20__ for the following reason: I was medically unable to work to attend continuing education during the entire year of 20__." Below that she signed on the statement:

"I, Nathalie Perez, swear and affirm that the information provided on Page One and Two of this form, and on all attachments, is true and correct. I further understand that misrepresentation or falsification of any information contained herein may result in disciplinary action, including but not limited to suspension or revocation of my courtroom interpreters[sic] credential.

¶ 7 Respondent attached a doctor's note to the form which stated: "[Patient] has been ill + seen several times this year." On January 28, 2025, Gina Antipov, the Director of Court Services for the Administrative Office of the Courts, emailed Respondent letting her know the submitted doctor's note was insufficient and further advising her of the requirements of Rule 19 of the Rules of the State Board of Examiners of Certified Courtroom Interpreters in order to obtain an exemption from continuing education requirements. State's Ex. 7. Ms. Antipov also informed

Respondent that there was "*still time for [Respondent's] completion of the required 8 continuing education units, but [Respondent would] now [be] subject to the \$100 Continuing Education Penalty Fee.*" State's Ex. 7 (emphasis original). On February 5, 2025, Respondent submitted a letter from her doctor, dated February 3, which stated

This letter is to certify that NATHALIE PEREZ is suffering from fibromyalgia and generalized anxiety disorder that prevented her from working as an Interpreter and completing her continued education. Because of these medical conditions, the above patient is seeking exemption. Your cooperation regarding this matter is greatly appreciated. Please do not hesitate to contact my office with any questions or concerns.

State's Ex. 8.

¶ 8 During 2024, Respondent worked every month of the year for a total of 132 cases. See State's Ex. 9. Respondent submitted eighteen court fund claims during 2024 for her work. See *id.* Respondent earned \$8,347.50 for her work as a registered courtroom interpreter in 2024. See *id.*

¶ 9 On April 29, 2025, Counsel for the Board sent Respondent notice of a complaint initiated against her which stated in part:

The complaint is based on your request for an exemption from the continuing education requirement. The basis of your request was "I am medically unable to work or attend continuing education during the entire year." Your written statement was verified under oath setting forth the grounds for exemption as provided in 20 O.S. Ch. 23, App. II, Rule 19. Based on information and belief, you have misrepresented material facts to the Administrative Office of the Courts regarding your ability to work or attend the required continuing education.

State's Ex. 3.

¶ 10 Respondent replied in a letter dated May 23, 2025:

I am writing in response to the complaint filed by the Board of Certified Courtroom Interpreters alleging my non-compliance with yearly continuing education requirements for 2025.

The facts surrounding my exemption claim are as follows:

It was never my intention to misrepresent myself to the Board.

- I claimed exemption due to a temporary medical disability/illness[.]
- Medical documentation was submitted to the Board within required timelines[.]
- I checked the box that best fit my circumstances at the given time.

Notably, my actions are in full compliance with: Oklahoma Statutes, Title 63, Section 1825, which governs continuing education requirements for certified interpreters. I worked extremely hard to obtain my certification and maintain it throughout many years with no complaint ever filed against me. My diagnosis came about abruptly and has disrupted my entire year, however I still have tried to make myself available to the courts when needed and was able to. I would like to formally apologize to the Board and ask for the opportunity to fulfill my obligation to complete the annual continuing education requirement. I respectfully request dismissal of this complaint and confirmation of my good standing with the Board.

State's Ex. 10. On June 23, 2025, this Court administratively suspended Respondent based on Respondent's above actions, effective that date. See *In re: Suspension of Credential of Registered Ctrm. Interpreter, SCAD-2025-46.*

¶ 11 On July 28, 2025, Respondent was served with the verified complaint and notice of hearing in this matter, to occur on August 22, 2025. See State's Ex. 2. Respondent was represented at the hearing by her counsel, who appeared through videoconferencing. The Board admitted ten exhibits into evidence and heard evidence from one witness, Ms. Antipov. Respondent offered no witnesses or exhibits.

¶ 12 Ms. Antipov testified at the hearing regarding the facts of this case and her communications with Respondent. Ms. Antipov testified that Respondent's statement claiming eligibility for a medical exemption was materially false. Ms. Antipov also testified that the submitted letter from the doctor was also materially false because Respondent worked throughout 2024.

¶ 13 The Board agreed that Respondent's statements that she was medically unable to work were materially false because Respondent worked as an interpreter every month in calendar year 2024. See Findings of Fact, Conclusions of Law and Recommendation of Discipline 8, No. 28, Oct. 6, 2025. The Board found that Respondent violated Rule 2(b) and section 1702(A)(5)(b) when she submitted a sworn statement that she was medically unable to work during 2024 and she submitted a materially false physician's letter to the Board, both misrepresentations of fact made in obtaining certification by the Board. *Id.*, at 9, Nos. 35--36. The Board also found that Respondent violated Rule 2(d) and section 1702(A)(5)(d) when she submitted a sworn statement that she was medically unable to work during 2024 and she submitted a materially false physician's letter to the Board, both constituting "fraud - specifically, fraudulent misrepresentation." See Findings of Fact, Conclusions of Law and Recommendation of Discipline 10, Nos. 38--40. The Board voted unanimously that Respondent's enrollment as a registered courtroom interpreter should be revoked. *Id.*, at 11.

¶ 14 Upon *de novo* review, we hold that Respondent violated Rule 2(b) in attempting to obtain her certification renewal by submitting the false sworn statement in her Annual Renewal form that she was medically unable to work or attend continuing education during the entire year when she did in fact work every month that year. The verified complaint also asserted that Respondent violated Rule 2(d) (fraud), with a citation to *Bowman v. Presley*:

the common law, which remains in force unless a legislative enactment expressly states otherwise, provides the elements of actionable fraud: 1) a false material misrepresentation, 2) made as a positive assertion which is either known to be false or is made recklessly without knowledge of the truth, 3) with the intention that it be acted upon, and 4) which is relied on by the other party to his (or her) own detriment. Fraud is never presumed and each of its elements must be proved by clear and convincing evidence.

Bowman v. Presley, 2009 OK 48, ¶ 13, 212 P.3d 1210, 1217--18. While Respondent met the first three elements of fraud, there was no evidence submitted that the Board relied upon or were deceived by Respondent's false material misrepresentation. As a result, we do not find Respondent guilty of fraud under Rule 2(d).

¶ 15 We also do not find Respondent violated Rule 2(b) (misrepresentation) or 2(d) (fraud) with the physician's note and letter she submitted. The note simply stated that Respondent had "been ill" and "seen several times this year." The letter from Respondent's physician certified her health issues and stated they "prevented her from working as an Interpreter and completing her continued education." Neither the note nor the letter stated that Respondent was unable to work or attend continuing education for the *entire year*, simply that she was prevented from working or completing her continuing education due to her health issues. While Respondent did work throughout the year, there was no evidence presented that her health did not prevent her from working more. There was also no evidence regarding whether Respondent worked the same amount or less than the amount she worked in other years. Simply, there was no evidence presented that Respondent was not *prevented from working* because of her health issues. We will not find Respondent guilty of fraudulent misrepresentation or fraud for submitting letters that were possibly correct statements in order to support her own misrepresentation.

¶ 16 Respondent claimed that she did not intend to misrepresent herself to the Board, but rather she simply checked the box that "best fit her circumstances at the time." State's Ex. 10. Unfortunately, the exception to completion of continuing education requirements in Rule 19 is only available in very limited circumstances which Respondent did not meet. Beyond those, Rule 18(h) allows an interpreter to seek a hardship exception when

renewing their certificate--but not does explain how to obtain a hardship exception. Respondent chose not to pursue a hardship exception or request information about it. Further, when Ms. Antipov emailed Respondent to let her know that her initial doctor's note that she submitted was insufficient, Ms. Antipov also laid out the requirements of Rule 19, and informed Respondent that she could still complete her continuing education with payment of a fine. Respondent also chose not to pursue that course of action.

¶ 17 Based on the foregoing, we find that the Board met its burden regarding the material elements of the complaint that Respondent violated Rule 2(b). "The court, parties, and counsel all depend on the integrity of courtroom interpreters to administer justice." *State ex rel. State Bd. of Examiners of Certified Ctrm. Interpreters v. Alvarado*, 2025 OK 69, ¶ 7, 579 P.3d 619, 622. We find that discipline is warranted because Respondent's misrepresentation in obtaining her credential renewal demonstrates a lack of integrity. Respondent's lack of integrity demonstrates a likelihood that Respondent will be unable to properly discharge her duties and responsibilities as a Registered Courtroom Interpreter.

¶ 18 We do not adopt the Board's recommendation to revoke Respondent's enrollment as a registered courtroom interpreter. Rather, we find the appropriate discipline is suspension for one year, starting when Respondent was administratively suspended on June 23, 2025. See RGDP-CI 6(d). Respondent may seek reinstatement of her credentials in accordance with RGDP-CI 9(a).

RESPONDENT'S ENROLLMENT AS A REGISTERED COURTROOM INTERPRETER IS SUSPENDED.

Rowe, C.J., Kuehn, V.C.J., Winchester, Edmondson, Combs, Gurich, Darby, and Kane, JJ., concur

Jett, J., concurs in result

FOOTNOTES

DARBY, J.:

¹ Section 1702(A)(5) states the Board shall

[c]onduct proceedings, on reasonable notice, the object of which are to recommend to the Supreme Court the suspension, cancellation, revocation, or reinstatement of the enrollment of a certified courtroom interpreter on the following grounds:

- a. a final conviction of a criminal offense involving moral turpitude,
- b. misrepresentation in obtaining an Oklahoma courtroom interpreter credential,
- c. any violation of or noncompliance with any rule or directive of the Supreme Court including but not limited to the Code of Professional Responsibility for Interpreters in the Oklahoma Courts,
- d. fraud, gross incompetence, or gross or habitual neglect of duty,
- e. misrepresentation of credential level or status while engaging in the practice of courtroom interpreting in a court of this state or accepting payment from the court at an hourly rate greater than the rate authorized for the level of credential held by the interpreter,
- f. engaging in the practice of courtroom interpreting or translating in a court of this state while certification is suspended,
- g. failure to renew credential pursuant to rules of the Board, or
- h. failure to annually complete at least eight (8) hours of continuing education approved by the State Board of Examiners of Courtroom Interpreters

² Rule 2 states

Upon receiving a complaint, or as otherwise hereafter provided, the Board shall conduct proceedings, on reasonable notice, the object of which is to recommend to the Supreme Court discipline of any courtroom interpreter, where it shall be determined there exists any of the following grounds:

a) Final conviction of a criminal offense which indicates a clear and rational likelihood that the interpreter will not properly discharge the responsibilities of a certified courtroom interpreter;

1) As used in this Rule, "criminal offense" shall include, but is not limited to i) any felony, ii) any lesser crime that reflects adversely on the interpreter's honesty, trustworthiness or fitness to practice court interpreting, and/or iii) any crime a necessary element of which, as determined by the statutory or common law definition of the crime, involves interference with the administration of justice, false swearing, misrepresentation, fraud, deceit, bribery, extortion, misappropriation, theft, or an attempt, conspiracy or solicitation of another to commit a such an offense.

2) As used in this Rule, a final conviction includes a plea of guilty or nolo contendere pursuant to a deferred sentence plea agreement, a verdict or finding of guilt, or pronouncement of sentence by a trial court even though that conviction may not be final or sentence may not be actually imposed until all appeals are exhausted.

b) The misrepresentation of any fact in obtaining certification;

c) Any violation of, or noncompliance with any rule or directive of the Supreme Court, including but not limited to the Code of Professional Responsibility for Interpreters in the Oklahoma Courts;

d) Fraud, gross incompetence, gross or habitual neglect of duty;

e) Misrepresentation of certification level or status while engaging in the practice of courtroom interpreting or translating in an Oklahoma court; or

f) Engaging in the practice of courtroom interpreting in an Oklahoma court while certification is suspended.

RGDP-CI, 20 O.S.2025, ch. 23, app. III, R. 2.

³ Administrative Procedure: Administrative suspension and revocation of an interpreter's certificate for nonrenewal shall be accomplished as set forth in this Rule. Bona fide hardship exceptions may be considered on a case-by-case basis by the Board, in its sole discretion. The formal disciplinary procedures provided for by the Rules Governing Disciplinary Proceedings of the State Board of Examiners of Certified Courtroom Interpreters, including the notice and hearing requirements, have no application to administrative suspensions and revocations based solely on failure to renew a certificate.

Rs. of the State Brd. of Examiners of Certified Ctrm. Interpreters, R. 18(h).

Citationizer® Summary of Documents Citing This Document

Cite Name Level

None Found.

Citationizer: Table of Authority

Cite Name

Level

Oklahoma Supreme Court Cases

Cite	Name	Level
<u>2009 OK 48, 212 P.3d 1210,</u>	<u>BOWMAN v. PRESLEY</u>	Discussed
<u>2025 OK 69, 579 P.3d 619,</u>	<u>OKLAHOMA ex rel. STATE BOARD OF EXAMINERS OF CERTIFIED COURTROOM INTERPRETERS v. ALVARADO</u>	Discussed

Title 20. Courts

Cite	Name	Level
<u>20 O.S. 1702,</u>	<u>Duties and Powers of State Board of Examiners of Certified Courtroom Interpreters</u>	Discussed at Length
<u>20 O.S. 1704,</u>	<u>Continuing Education</u>	Cited