



7. **06/26/2012:** Custer County District Court charged with Felony Larceny of Merchandise and Obtaining Cash/Merchandise by False Pretense case **CF-2012-260**. Defendant pled guilty on 11/02/2012 and received a Deferred sentence on both counts.
8. **07/18/2012:** Canadian County District Court charged with Felony Larceny of Merchandise and Possession of CDS (Schedule III Hydrocodone) case **CF-2012-415**. Defendant pled guilty on 08/06/2012 and received a Deferred on both counts.
9. **12/12/2012:** Canadian County District Court issued an Arrest Warrant for Failure to Comply With a Court Order in reference to case **CF-2012-415**. Defendant was arrested on 04/29/2013.
10. **01/04/2013:** Custer County District Court charged with misdemeanor Larceny of Merchandise case **CM-2013-012**. Defendant pled guilty on 02/28/2013 and received thirty days in the Custer County jail.
11. **01/09/2013:** Custer County District Court charged with Felony Larceny of Merchandise case **CF-2013-013**. Defendant pled guilty on 02/28/2013 and received a five (5) year sentence with all but six months suspended.
12. **03/08/2013:** Major County District Court charged with misdemeanor Obtaining Merchandise by Means of Bogus Check case **CM-2013-00054**. This case is pending.

### **Fraudulent Licensure Renewal**

13. On Defendant's Occupational Assistant Licensure renewal dated **10-30-2011**, she answered "**NO**" to question "**D**" which asks, "Have you been arrested for, charged with, or convicted of a felony or misdemeanor other than a traffic violation?"
14. On Defendant's Occupational Assistant Licensure renewal dated **11-15-2012**, she answered "**NO**" to "**D**" which asks, "Have you been arrested for, charged with, or convicted of a felony or misdemeanor other than a traffic violation?"
15. On Defendant's Occupational Assistant Licensure renewal dated **11-15-2012**, she answered "**NO**" to question "**H**" which asks "Have you had any mental or physical disorder or condition, which if untreated, could affect your ability to practice competently". On Canadian County case **CF-2012-415**, her Plea of Guilty-Summary of Facts filed **08-06-2012** lists she has Schizophrenia according to Dr. Cummings in Ponca City. Defendant also stated she has a diagnosis of bipolar/schizophrenia to Board Investigator RD when she self reported on **09/24/2012**.
16. Defendant is guilty of unprofessional conduct in that she engaged in:
  - a) Obtaining a license by means of fraud, misrepresentation, or concealment of material facts in violation of Title 59 O.S. §888.9(A)1;
  - b) Engaging in unprofessional conduct as defined by the rules established by the Board, or

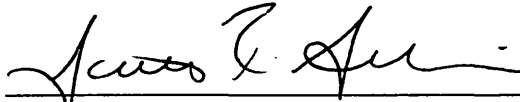
violating the Code of Ethics adopted and published by the Board in violation of Title 59 O.S. §888.9(A)2;

- c) Being convicted of any federal or state law, excepting any misdemeanor, traffic law or municipal ordinance in violation of Title 59 O.S. §888.9(A)3;
- d) Violating any lawful order, rule, or regulation rendered or adopted by the Board in violation of Title 59 O.S. §888.9(A)4;
- e) Violating any provisions of this act in violation of Title 59 O.S. §888.9(A)5;
- f) Conviction of a felony or of any offense involving moral turpitude in violation of Oklahoma Administrative Code Title 435:30-1-10(A)(1);
- g) Conviction of, or confession of or plea of no contest to a felony or misdemeanor in violation of Oklahoma Administrative Code Title 435:30-1-10(A)(2);
- h) Dishonorable or immoral conduct that is likely to deceive, defraud, or harm the public in violation of Oklahoma Administrative Code Title 435:30-1-10(A)(3);
- i) Procuring, aiding or abetting a criminal operation in violation of Oklahoma Administrative Code Title 435:30-1-10(A)(5);
- j) Participation in fraud, abuse and/or violation of state or federal laws in violation of Oklahoma Administrative Code Title 435:30-1-10(A)(6);
- k) Unauthorized possession or use of illegal or controlled substances or pharmacological agents without lawful authority or prescription by an authorized and licensed independent practitioner of the State of Oklahoma in violation of Oklahoma Administrative Code Title 435:30-1-10(A)(12);
- l) Obtaining or attempting to obtain a license, certificate or documents of any form as an occupational therapist or occupational therapy assistant by fraud or deception in violation of Oklahoma Administrative Code Title 435:30-1-10(A)(24); and
- m) Failure to report to the Board any adverse action taken against him or her by another licensing jurisdiction (United States or foreign), by any governmental agency, by any law enforcement agency, or by a court for acts or conduct similar to acts or conduct that would constitute grounds for action as defined in this section in violation of Oklahoma Administrative Code Title 435:30-1-10(A)(30).

**Conclusion**

WHEREFORE, the Plaintiff respectfully requests that the Board conduct a hearing, and upon proof of the allegations contained herein, impose such disciplinary action as authorized by law, up to and including suspension or revocation and any other appropriate action with respect to Defendant's medical license, and an assessment of costs and attorney's fees incurred in this action as provided by law.

Respectfully submitted,



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