

**IN AND BEFORE THE OKLAHOMA STATE BOARD
OF MEDICAL LICENSURE AND SUPERVISION
STATE OF OKLAHOMA**

FILED

MAY 17 2023

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

STATE OF OKLAHOMA, *ex rel.*)
OKLAHOMA STATE BOARD)
OF MEDICAL LICENSURE)
AND SUPERVISION,)
)
Plaintiff,)
)
v.)
)
JAMIE LOUISE SHACKELFORD, OT,)
LICENSE NO. OT 1269,)
)
Defendant.)

Case No. 23-04-6214

VERIFIED COMPLAINT

The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision (“Board”), for its Verified Complaint against Jamie Louise Shackelford, OT (“Defendant”), alleges and states as follows:

I. JURISDICTION

1. 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 Occupational Therapists in the State of Oklahoma. 59 O.S. § 888.1, *et seq.* and Okla. Admin. Code 435:30-1-1, *et seq.*
2. In Oklahoma, Defendant holds Oklahoma License No. OT 1269.

II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

3. Defendant was initially issued her Occupational Therapy license, No. 1269, by the Board on November 1, 2002.
4. Defendant’s Occupational Therapy license, No. 1269, was due to expire on October 31, 2021, absent renewal.
5. The Board received a complaint on or about March 31, 2023, alleging that Defendant had been engaged in the practice of occupational therapy at her place of employment, Independent School District No. I-89 of Kingfisher County, OK (“Cashion Schools”) with an inactive, expired license.
6. Board investigators subsequently learned from Cashion Schools Superintendent Leon

Ashlock that Defendant's employment had been terminated after it was discovered that her license to practice occupational therapy was and had been inactive.

7. On or about April 6, 2023, Defendant admitted to Board investigator Robbin Roberts that she had intentionally continued her employment with Cashion Schools providing occupational therapy services knowing that her license had expired and become inactive. Specifically, Defendant fraudulently altered the wording of her "Occupational Therapy Services Agreement" with Cashion Schools for the 2022-2023 academic calendar year to read that she only need be certified "by the National Board of Certification in Occupational Therapy," thereby omitting the portion certifying she was "licensed by the State of Oklahoma."

III. VIOLATIONS

8. Based on the foregoing, Defendant is guilty of violating the following relevant provisions of law:
 - a. Practicing occupational therapy or holding oneself out as an occupational therapist, or as being able to practice occupational therapy, or to render occupational therapy services in this state without being licensed in accordance with the provisions of the Occupational Therapy Practice Act, in violation of 59 O.S. § 888.4(A).
 - 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 59 O.S. § 888.9(A)(2) of the Occupational Therapy Practice Act, to wit:
 - i. Conduct likely to deceive, defraud, or harm the public, in violation of Okla. Admin. Code § 435:30-1-10(a)(2).
 - ii. Participation in fraud, abuse and/or violation of state laws, in violation of Okla. Admin. Code § 435:30-1-10(a)(5).
 - iii. Failing to timely make application for license renewal, in violation of Okla. Admin. Code § 435:30-1-10(a)(21).
 - iv. 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 Okla. Admin. Code § 435:30-1-10(a)(23).
 - v. Violation of any provision(s) of the Occupational Therapy Practice Act or the rules and regulations of the board or of an action, stipulation, agreement or order of the Board, in violation of Okla. Admin. Code § 435:30-1-10(a)(28).

IV. CONCLUSION

Given the foregoing, the undersigned respectfully requests 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 professional license, including an assessment of costs and attorney's fees incurred in this action as provided by law.

Respectfully submitted,




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VERIFICATION


I, Robbin Roberts, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

1. I have read the above Complaint regarding Jamie Louise Shackelford, OT.; and
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.



Robbin Roberts, Investigator
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Date: 5-17-23



County, State of Execution