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

	FILED
STATE OF OKLAHOMA, ex rel.)
THE OKLAHOMA BOARD	MAY 29 2014
OF MEDICAL LICENSURE AND)
SUPERVISION,) OKLAHOMA STATE BOARD OF MEDICAL LICENSURE & SUPERVISION
Plaintiff,)
v.) Case No. 14-05-4968
KAREN STEVENSON)
LICENSE NO. OA 1432,	OKLÁHOM
Defendant.) we don't be

COMPLAINT

The State of Oklahoma, ex rel. the Oklahoma State Board of Medical Licensure and Supervision (the "Board"), alleges and states as follows for its Complaint against the Defendant, Karen Stevenson, O.A.:

- 1. The Board is a duly authorized agency of the State of Oklahoma empowered to license and oversee the activities of occupational therapy assistants in the State of Oklahoma pursuant to O.S. 59, §§ 480 et seq. and §888.1 et seq.
- 2. The Defendant, Karen Stevenson, OA, holds Oklahoma occupational therapy assistant license no. 1432.

History with the Board

3. On September 12, 2013, the Defendant was placed on Agreement with the Board due to questions raised during the application process regarding her drug-related and larceny of merchandise arrests in 1999, 2003, 2004, and 2005.

Violation of Agreement

4. On or about March 17, 2014, the Defendant met with Board Compliance Coordinator and reported that she relapsed on Vicoprofen and alcohol "the night before the Super Bowl" (February 1, 2014). She stated her relapse was triggered by the stress of her boyfriend's

illness, loneliness and her co-dependency issues. The Defendant admitted she did not attend a minimum of three (3) meetings per week of a recognized 12-step program.

5. The Defendant is in violation of the following paragraphs of the Agreement for Licensure entered into on September 12, 2013:

Paragraph C: Applicant will take no medication except that which is authorized by a physician treating Applicant for a legitimate medical need and only during that time in which he is being treated by the physician for that specific medical need. Applicant will have the affirmative duty to inform any and every doctor treating Applicant of this agreement prior to the commencement of, or continuation of presently ongoing, treatment;

Paragraph D: Applicant will have the affirmative duty not to ingest any other substance which will cause a body fluid sample to test positive for prohibited substances, including but not limited to alcohol;

Paragraph J: Any violation of the terms, conditions and requirements of this Agreement shall constitute conclusive evidence of unprofessional or dishonorable conduct, which may result in disciplinary action, including suspension or revocation; and

Paragraph Q – Applicant will attend a minimum of three (3) meetings per week of a recognized 12-step program.

6. The Defendant is guilty of unprofessional conduct in that she is in:

Violation of any provision(s) of the medical practice act or the rules and regulations of the Board or of any action, stipulation or agreement of the Board as stated in Oklahoma Administrative Code § 435:10-7-4(39).

Conclusion

Given the foregoing, the undersigned requests that a hearing be conducted 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 the Defendant's professional license, and an assessment of costs and attorney's fees incurred in this

action as provided by law.

Respectfully submitted,

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- Primary Contact Information -

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