

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

FILED

APR - 6 2022

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

STATE OF OKLAHOMA, *ex rel.*,)
OKLAHOMA STATE BOARD OF)
MEDICAL LICENSURE)
AND SUPERVISION,)

Plaintiff,)

v.)

ALETHEA FARRIS, OT)
LICENSE NO. OT 1731)

Defendant.)

Case No. 20-11-5945

VERIFIED COMPLAINT

The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision ("Board"), alleges and states as follows for its Complaint against **ALETHEA FARRIS, OT** ("Defendant"):

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 1731.

II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

3. Defendant's Occupational Therapy License No. 1731 expired in October of 2019 after Defendant failed to timely renew.
4. Defendant continued to hold herself out as an Occupational Therapist to the public without a license.
5. Defendant solicited Occupational Therapy patients for her business without a license.
6. Defendant practiced Occupational Therapy on patients without a license.
7. Defendant failed to cooperate with Board investigators during this investigation.

III. VIOLATIONS

8. Based on the foregoing, **ALETHEA FARRIS, OT**, is guilty of unprofessional conduct as follows:
- a. Engaging in unprofessional conduct as defined by the rules established by the Board, in violation of 59 O.S. § 888.9(A)(2).
 - b. Violating any lawful order, rule, or regulation rendered or adopted by the Board, in violation of 59 O.S. § 888.9(A)(4).
 - c. Violating any provisions of the Occupational Therapy Practice Act, in violation of 59 O.S. § 888.9(A)(5).
 - d. Representing oneself as an occupational therapist while unlicensed, in violation of 59 O.S. § 888.15(A).
 - e. Failure to cooperate in a lawful investigation conducted by the Board, in violation of OAC 435:10-7-4(38).
 - f. Violation of the rules and regulations of the Board, in violation of OAC 435:10-7-4(39).

IV. CONCLUSION

Given the foregoing, the undersigned respectfully request the Board to conduct a hearing, and upon proof of the allegation(s) contained herein, impose an appropriate punishment pursuant to the applicable law and rule on **ALETHEA FARRIS, OT** including an assessment of costs and attorneys' fees incurred in this action as provided by law.

Respectfully submitted,

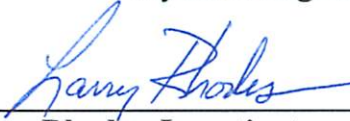


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VERIFICATION

I, Larry Rhodes, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

1. I have read the above Complaint regarding **ALETHEA FARRIS, OT**, and,
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.



Larry Rhodes, Investigator
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Executed this 6 day of April, 2022, in Oklahoma County, State of Oklahoma.