

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

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

Plaintiff,)

v.)

JANET LEE ROBBINS, O.A.,)
LICENSE NO. OA 443,)

Defendant.)

FILED
SEP 25 2019
OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 19-04-5738

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 **JANET LEE ROBBINS, O.A.** (“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 Therapy Assistants in the State of Oklahoma. OAC 435:30-1-10(a); 59 O.S. §888.2; 59 O.S. §888.9; and, 59 O.S. §59 O.S. §888.14(c).
2. In Oklahoma, Defendant holds Oklahoma Occupational Therapy Assistant license number 443.
3. The acts and omissions complained of herein were made while Defendant was acting as a Occupational Therapy Assistant, pursuant to the license conferred upon her by the State of Oklahoma. Such acts and omissions occurred within the physical territory of the State of Oklahoma.

II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

4. On or about March 22, 2019, a complaint was filed with the board against the Defendant.

5. Defendant's Occupational Therapy Assistants license expired on November 1, 2018.
6. Defendant renewed her Occupational Therapy Assistants license on April 22, 2019.
7. Defendant admits she continued to work as an Occupational Therapy Assistant during the period she was not properly licensed.


III. VIOLATIONS

8. Based on the foregoing, Defendant is guilty of unprofessional conduct as follows:
 - a. Failing to timely make application for license renewal in violation of 435:30-1-10(21).

IV. CONCLUSION

Given the foregoing, the undersigned respectfully request the Board to conduct a hearing, and upon proof of the allegation contained herein, impose such disciplinary action as authorized bylaw, up to and including suspension or revocation and any other appropriate action with respect to the Defendant's professional license, including an assessment of costs and attorney's fees incurred in this action as provided by law.

Respectfully submitted,

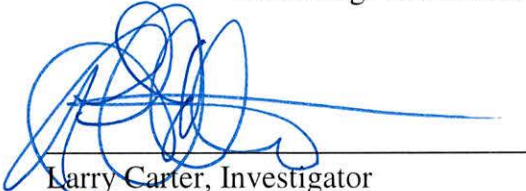


Marc S. Pate, OBA No. 10567
Assistant Attorney General
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VERIFICATION

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

1. I have read the above Complaint regarding **JANET LEE ROBBINS, O.A.**; and,
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.



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

Date: 18 Sept 2019
Oklahoma County, Oklahoma