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

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STATE OF OKLAHOMA) FEB - 7 2003	
EX REL. THE OKLAHOMA BOARD)	
OF MEDICAL LICENSURE) OKLAHOMA STATE BOARD OF	
AND SUPERVISION,) MEDICAL LICENSURE & SUPERVISION	
)	
Plaintiff,) Case No. 03-01-2597	
)	
v.)	
)	
SHERRI LOUISE CAMPBELL, OTA)	
LICENSE NO. OA501)	
)	
Defendant.)	

COMPLAINT

COMES NOW the Plaintiff, the State of Oklahoma ex rel. the Oklahoma State Board of Medical Licensure and Supervision (the "Board"), by and through its attorney, Elizabeth A. Scott, Assistant Attorney General, and for its Complaint against the Defendant, Sherri Louise Campbell, OTA, alleges and states as follows:

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 59 Okla. Stat. §888.1 *et seq.*

2. Defendant, Sherri Louise Campbell, OTA, holds Oklahoma license no. OA501, and is authorized to practice as an occupational therapy assistant in the State of Oklahoma.

3. On or about October 14, 2001, Defendant was arrested and charged with **DRIVING WHILE UNDER THE INFLUENCE OF INTOXICATING LIQUOR**, a misdemeanor, and **FAIL TO SIGNAL**, a misdemeanor, in the District Court of Tulsa County, State of Oklahoma, Case No. CM-2001-05340. Defendant was found guilty of the charges and ordered to enter the DUI program, perform community service, obtain a drinking driver assessment, and pay court costs and fines.

4. Defendant is guilty of unprofessional conduct in that she:

A. Engaged 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) as follows: 1. Has conducted herself in a manner considered improper by recognized acceptable standards of moral and ethical conduct as determined by the Board in violation of OAC 435:30-1-10(6).

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 occupational therapy assistant license, and an assessment of costs and attorney's fees incurred in this action as provided by law.

Respectfully submitted,

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Attorney for the Plaintiff