

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

**FILED**

NOV 12 2024

OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE & SUPERVISION

STATE OF OKLAHOMA, *ex rel.* )  
OKLAHOMA STATE BOARD )  
OF MEDICAL LICENSURE )  
AND SUPERVISION, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
SHAMIKA RUTH KHAN, OT, )  
LICENSE NO. OT 5763, )  
 )  
Defendant. )

Case No. 24-07-6376

**VERIFIED COMPLAINT**

The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision (“Board”), for its Verified Complaint against Shamika Ruth Khan, 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 occupational therapist license no. OT 5763.

**II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT**

3. Defendant was initially issued her Occupational Therapy license, No. 5763, by the Board on March 29, 2023.
4. The Board initially received a complaint from Defendant’s former employer informing that Defendant had been terminated based on a determination that Defendant had documented treatment time for a patient which she had not in fact not provided. Following investigation, it was additionally determined that Defendant had fraudulently documented treatment time for at least seven (7) other patients on the same date.

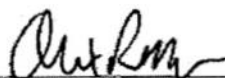
### III. VIOLATIONS

5. Based on the foregoing, Defendant is guilty of violating the following relevant provisions of law:
- a. 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. Dishonorable or immoral conduct that is likely to deceive, defraud or harm the public, in violation of Okla. Admin. Code § 435:30-1-10(2).
    - ii. Participation in fraud, abuse and/or violation of state or federal laws, in violation of Okla. Admin. Code § 435:30-1-10(5).
    - iii. Improper management of medical records, inaccurate recording, falsifying or altering of patient records, in violation of Okla. Admin. Code § 435:30-1-10(7).

### 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,



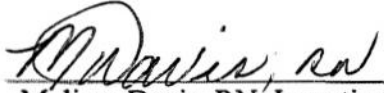
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**VERIFICATION**

I, Melissa Davis, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

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

  
\_\_\_\_\_  
Melissa Davis, RN, Investigator  
OKLAHOMA STATE BOARD OF MEDICAL  
LICENSURE AND SUPERVISION

Date: November 12, 2024

Oklahoma, Oklahoma  
County, State of Execution