

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

FILED

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

JUN 44 2007

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Plaintiff,)

vs.)

CASE NO. 07-06-3312

STACY HEATHER KING, OTA)
LICENSE NO.OA780,)

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, Stacy Heather King, 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 O.S. §§ 480 *et seq.* and 888.1 *et seq.*
2. Defendant, Stacy Heather King, OTA, holds occupational therapy assistant license no. OA780 in the State of Oklahoma.
3. On or about December 1, 2006, Board staff notified Defendant that she had been randomly selected to submit documentation of twenty (20) hours of continuing education between November 1, 2004 and October 31, 2006 for audit by the Occupational Therapy Advisory Committee, as is required pursuant to OAC 435:30-1-5(b)(1).
4. Defendant failed to submit any documentation of continuing education to the Occupational Therapy Advisory Committee.
5. On or about January 16, 2007, Defendant was notified via certified mail that the Board had not received the documentation requested. Defendant was further notified that if documentation of continuing education was not received by May 25, 2007, disciplinary proceedings could be initiated.

6. As of this date, Defendant has not submitted the requested documentation of continuing education.

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

A. Violated any lawful order, rule, or regulation rendered or adopted by the Board in violation of 59 O.S. §888.9(A)(4) and OAC 435:30-1-5((b).

B. Violated any provision of this act (the Oklahoma Occupational Therapy Practice Act) in violation of 59 O.S. §888.9(A)(5) and OAC 435:30-1-10(a)(29) and OAC 435:30-1-5(b).

8. These allegations raise serious concerns about Defendant's ability to practice as an occupational therapy assistant in the State of Oklahoma with reasonable skill and safety.

WHEREFORE, plaintiff 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, the assessment of costs and fees incurred in this action, and any other appropriate action with respect to Defendant's license to practice as an occupational therapy assistant in the State of Oklahoma.

Dated this 14 day of June, 2007.

Respectfully submitted,



Elizabeth A. Scott (OBA #12470)

Assistant Attorney General

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Attorney for State ex rel.

Oklahoma Board of Medical Licensure and
Supervision