

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

FILED

OCT - 6 2022

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

STATE OF OKLAHOMA, *ex rel.*)
OKLAHOMA STATE BOARD)
OF MEDICAL LICENSURE)
AND SUPERVISION,)
)
Plaintiff,)
)
v.)
)
HANNAH LEAH MONROE, OA,)
LICENSE NO. OA 831,)
)
Defendant.)

Case No. 22-07-6143

VERIFIED COMPLAINT

The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision (“Board”), for its Verified Complaint against Hannah Leah Monroe, OA (“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 Therapist Assistants in the State of Oklahoma. 59 O.S. § 888.1, *et seq.* and Okla. Admin. Code 430:30-1-1 *et seq.*
2. In Oklahoma, Defendant holds Oklahoma License No. OA 831.

II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT

3. Defendant was initially issued her Occupational Therapy Assistant license, No. 831, by the Board on August 20, 2004.
4. Defendant’s Occupational Therapy Assistant license, No. 831, was due to expire on October 31, 2019, absent renewal.
5. Defendant was charged with violation of 21 O.S. § 645, Assault and Battery with a Dangerous Weapon, a felony, in the District Court of Cleveland County, State of Oklahoma on April 9, 2019.
6. Defendant subsequently submitted her Application for Renewal of Oklahoma License to the Board requesting renewal of her Occupational Therapist Assistant license for

calendar year 2020 on October 22, 2019.

7. Defendant again submitted her Application for Renewal of Oklahoma License to the Board requesting renewal of her Occupational Therapist Assistant license for calendar year 2021 on October 30, 2020.
8. Defendant further submitted her Application for Renewal of Oklahoma License to the Board requesting renewal of her Occupational Therapist Assistant license for calendar year 2022 on October 27, 2021.
9. Defendant made an intentional, material misrepresentation on her Application for Renewal of Oklahoma License at the time of each respective submission to the Board described herein. Specifically, Defendant responded to Question P., "Since last renewal, have you been arrested, charged with, or convicted of a felony?" in the negative.
10. Defendant knew or should have known at the time of submitting her Application for Renewal of Oklahoma License that she had been charged with violation of 21 O.S. § 645, Assault and Battery with a Deadly Weapon, a felony.

III. VIOLATIONS

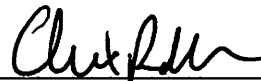
11. Based on the foregoing, Defendant is guilty of violating the following relevant provisions of law:
 - a. Engaging in unprofessional conduct as defined by the rules established by the Board, or violating the Code of Ethics adopted and published by the Board, in violation of 59 O.S. § 888.9(A)(2) of the Occupational Therapy Practice Act, to wit:
 - i. Conduct 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 laws, in violation of Okla. Admin. Code § 435:30-1-10(5).
 - iii. Obtaining or attempting to obtain a license, certificate or documents of any form as an occupational therapist or occupational therapy assistant by fraud or deception, in violation of Okla. Admin. Code § 435:30-1-10(23).
 - iv. Violation of any provision(s) of the Occupational Therapy Practice Act or the rules and regulations of the board or of an action, stipulation, agreement or order of the Board, in violation of Okla. Admin. Code § 435:30-1-10(28).
 - v. Failure to report to the Board any adverse action taken against him or her by another licensing jurisdiction (United States or foreign), by any governmental agency, by any law enforcement agency, or by a court for

acts or conduct similar to acts or conduct that would constitute grounds for action as defined in this section, in violation of Okla. Admin. Code § 435:30-1-10(29).

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,




Alex A. Pedraza, OBA No. 33584
Assistant Attorney General
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION
101 N.E. 51st Street
Oklahoma City, Oklahoma 73105
405.522.5264

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 Hannah Leah Monroe, OA.; 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: 10-5-2022

OK County, OK
County, State of Execution