



OFFICE OF THE ATTORNEY GENERAL  
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION  
**2025-53A**

Oklahoma State Board of Cosmetology and Barbering  
2401 N.W. 23 St., Suite 84  
Oklahoma City, Oklahoma 73107

October 7, 2025

Re: Shafer, Case No. 2025-003

To Whom It May Concern:

This office has received your request for a written Attorney General Opinion regarding the action that the Oklahoma State Board of Cosmetology and Barbering (the "Board") intends to take in the above-referenced case. Respondent holds a massage therapist license, number 177039, issued by the Board.

The Massage Therapy Practice Act authorizes the Board to take disciplinary action in cases where the licensee has committed "an act of unprofessional conduct" or violates a rule or law. 59 O.S.2021, § 4200.11(B)(2). Board rules state that a "licensee shall not massage the genitalia of a client nor engage in . . . any activity with the intent of sexually arousing a client." OAC § 175:20-9-1(h).

According to a Board complaint, Respondent was accused of sexually assaulting two different victims while receiving massages from the Respondent. During the Fall of 2024 Respondent massaged one client's perineum and placed his fingers on her labia and exposed her breasts. Then, on March 8, 2025, Respondent touched a different client's breasts and inserted his fingers into her vagina and touched her buttocks multiple times. Respondent is currently charged with a criminal felony in Oklahoma County District Court case number CF-2025-1646 related to these allegations. During questioning related to the criminal case against him, Respondent admitted to sexually assaulting one of the clients by inserting his finger into her vagina during the massage without her consent. Considering the record at hearing the Board concluded that revocation of Respondent's license is the most appropriate discipline.

It is, therefore, the official opinion of the Attorney General that the Oklahoma State Board of Cosmetology and Barbering has adequate support for the conclusion that this action advances the State's policy to protect public health, safety, and welfare by ensuring massage therapists adhere to professional conduct standards and do not harm their clients.

A handwritten signature in cursive script, appearing to read "Cheryl Dixon".

CHERYL DIXON  
*Deputy General Counsel*