

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, )

SEP 30 2004

OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE & SUPERVISION

Plaintiff, )

vs. )

CASE NO. 04-08-2851

BRAD LYNN EDWARDS, PTA )  
LICENSE NO. TA1060, )

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, Brad Lynn Edwards, PTA, 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 physical therapy assistants in the State of Oklahoma pursuant to 59 O.S. §§ 480 *et seq.* and 887.1 *et seq.*

2. Defendant, Brad Lynn Edwards, PTA holds physical therapy assistant license no. TA1060 in the State of Oklahoma.

3. On or about July 30, 2004, Defendant stole one to two Lortab tablets from the purse of a co-worker while employed at the University of Oklahoma Medical Center. Defendant subsequently ingested the Lortab.

4. On or about July 31, 2004, the co-worker reported the missing Lortab. Defendant was asked to provide a urine specimen for a drug test. Defendant agreed, then admitted that he had stolen the Lortab from the co-worker and had ingested them.

5. Based upon his admissions, Defendant was terminated by the University of Oklahoma Medical Center on July 31, 2004.

6. Based on the allegations stated above, Defendant is guilty of unprofessional conduct as follows:

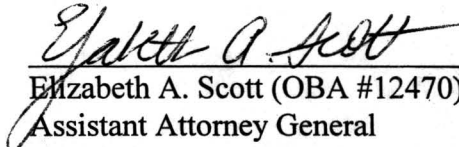
- A. Used drugs, narcotics, medication, or intoxicating liquors to an extent which affects the professional competency of the licensee in violation of 59 O.S. §887.13(4).
- B. Is guilty of conduct unbecoming a person licensed as a physical therapist or physical therapy assistant or guilty of conduct detrimental to the best interests of the public or his profession in violation of 59 O.S. §887.13(9).
- C. Is guilty of any act in conflict with the ethics of the profession of physical therapy in violation of 59 O.S. §887.13(10).
- D. Engaged in dishonorable or immoral conduct that is likely to deceive, defraud, or harm the public in violation of OAC 435:20-5-8(5).
- E. Engaged in any conduct which potentially or actually jeopardizes a patient's life, health or safety in violation of OAC 435:20-5-8(9).
- F. Engaged in the unauthorized possession or use of illegal or controlled substances or pharmacological agents without lawful authority or prescription by an authorized and licensed independent practitioner of the State of Oklahoma in violation of OAC 435:20-5-8(14).
- G. Violated any provision of the Physical 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 OAC 435:20-5-8(31).

7. These allegations raise serious concerns about Defendant's ability to practice as a physical 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 a physical therapy assistant in the State of Oklahoma.

Dated this 30<sup>th</sup> day of September, 2004.

Respectfully submitted,



Elizabeth A. Scott (OBA #12470)

Assistant Attorney General  
5104 N. Francis, Suite C  
Oklahoma City, OK 73154  
Attorney for State ex rel.  
Oklahoma Board of Medical Licensure and  
Supervision