

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

STATE OF OKLAHOMA

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

Plaintiff,

CHARLES JOHN DAY, P.T.  
Certificate No. PT1193,

Defendant.

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CASE NO. 93-04-1511

COMPLAINT

COMES NOW Steve Washbourne, Investigator for the Oklahoma State Board of Medical Licensure and Supervision, being first duly sworn upon oath and states:

1. That Charles John Day, P.T., holding Oklahoma Physical Therapy Certificate No. 1193, is in violation of the Oklahoma Physical Therapy Practice Act, 59 O.S. 1991, Sec. 887.13 (7), and (9), to-wit:

"(4 Use drugs, narcotics, medication or intoxicating liquors to an extent which affects the professional competency of the applicant or licensee."

"(7) Been grossly negligent in the practice of physical therapy or in acting as a physical therapist assistant."

"(9) Been guilty of conduct unbecoming a person licensed as a physical therapist or physical therapist assistant or guilty of conduct detrimental to the best interest of the public or his profession."

2. That since at least 1991, Defendant has habitually obtained and used various habit-forming controlled dangerous substances, to include but not be limited to various amphetamines and methamphetamines

3. That Defendant's use of the aforesaid controlled dangerous substances affects the professional competency performance of the Defendant.

4 That habitual use of the aforesaid controlled dangerous substances constitutes gross negligence by any person engaged in the practice of physical therapy.

5. That use of such controlled dangerous substances constitutes conduct unbecoming a person licensed as a physical therapist and is detrimental to the best interest of the public or his profession

6. That Defendant is perpetuating significant harm to public health, safety and welfare by the acts and omissions set forth in the above allegations.

WHEREFORE, Complainant prays this Board to conduct a hearing and upon proof of the allegations contained herein that such disciplinary action be taken by the Board as is authorized by law.

Steve Washbourne  
STEVE WASHBOURNE, Investigator  
Oklahoma State Board of  
Medical Licensure and Supervision

Subscribed and sworn to before me this 9 day of  
August, 1993.

Janet L Owens  
Notary Public

My Commission expires:  
12-20-91