

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, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
KARSTEN MEYER, PTA )  
LICENSE NO. TA1381, )  
 )  
Defendant. )

DEC -5 2008

OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE & SUPERVISION

CASE NO. 08-04-3487

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, Karsten Meyer, 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, Karsten Meyer, PTA holds physical therapy assistant license no. TA1381 in the State of Oklahoma.

3. On or about February 17, 2008, Defendant was working at Tulsa Spine & Specialty Hospital in Tulsa, Oklahoma.

4. According to Defendant's time sheet and billing records, he began work at 1:00 p.m. and finished at 4:45 p.m. However, hospital surveillance video reveals that he did not enter the hospital until approximately 8:30 p.m.

5. Defendant has admitted to Board investigators that he "fudged" on his billing records, in that he did not document the correct times when he worked. Defendant additionally admitted that he only performed approximately one-half of what he documented, in that he completed the physical therapy in a shorter amount of time than what he documented. He

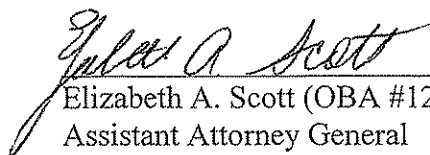
also admitted that he did not perform the exercises documented but that he did go into the patients' rooms.

6. Defendant is guilty of unprofessional conduct in that he:
  - A. Is guilty of conduct unbecoming a person licensed as a physical therapist or physical therapy assistant or is guilty of conduct detrimental to the best interests of the public or his profession in violation of 59 O.S. §887.13(9).
  - B. 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).
  - C. Is guilty of improper management of medical records, inaccurate recording, [or] falsifying ... in violation of OAC 435: 20-5-8(16).
  - D. 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).

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 24<sup>th</sup> day of November, 2008.

Respectfully submitted,

  
Elizabeth A. Scott (OBA #12470)

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Oklahoma Board of Medical Licensure and  
Supervision