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

STATE OF OKLAHOMA

STATE OF OKLAHOMA, ex rel.)
OKLAHOMA BOARD OF MEDICAL)
LICENSURE AND SUPERVISION,)
)
 Plaintiff,)

vs.

Case No. 94-03-1592

KIRT BEEBY, P.T.
Physical Therapy Lic. No. 1974)
)
 Defendant.)

COMPLAINT

COMES NOW Michael D. Kiser, Investigator for the Oklahoma Board of Medical Licensure and Supervision, being first duly sworn upon oath, and states:

1. That during the period of time between approximately August, 1992, through February, 1993, the defendant, Kirt Beeby, P.T., engaged in a sexual relationship with a patient referred to him by a physician, which patient shall be herein identified as "C.H.," during the course of treatment of patient C.H.;
2. That the sexual relationship complained of herein between the defendant and C.H. arose during the course of a therapist/patient relationship and was not consensual;
3. That the conduct complained of constitutes conduct unbecoming a physical therapist and was in no wise in the best interests of the public;
4. That, as such, the defendant has violated 59 O.S.1991, § 887.13(9);
5. That the Defendant would perpetuate a significant harm to the

public health, safety and welfare by continuing the acts and omissions set forth in the above allegations.

WHEREFORE, premises considered, the 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.

Michael D Kiser

Michael D. Kiser, Investigator
Oklahoma Board of Medical
Licensure and Supervision

Subscribed and sworn to before me this 3rd day of August, 1994.

Garnet Owens
Notary Public

My commission expires:

12-20-96