

**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,)
)
 vs.)
)
 BENJAMIN REEDER, P.T.A.,)
 LICENSE NO. TA 2204,)
)
 Defendant.)

FILED

FEB 19 2020

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 20-02-5877

VERIFIED COMPLAINT

The State of Oklahoma, *ex rel.* Oklahoma State Board of Medical Licensure and Supervision (“Board”), alleges and states as follows for its Complaint against Benjamin Reeder, T.A. (“Defendant”):

1. The Board has jurisdiction over the subject matter and is a duly authorized agency of the State of Oklahoma empowered to license and oversee the activities of physicians, surgeons and other allied health professionals in the State of Oklahoma pursuant to 59 O.S. § 480 *et seq.* and 59 O.S. § 887.1-887.18 and Oklahoma Administrative Code (OAC) § 435:20-1-1 *et seq.*
2. Defendant holds Oklahoma Physical Therapist license number TA 2204, which was issued November 8, 2012.
3. The acts and omissions complained of herein were made while Defendant was acting as a physical therapist assistant pursuant to the Physical Therapist Assistant license conferred upon him by the State of Oklahoma. Such acts and omissions occurred within the physical territory of the State of Oklahoma.

I. ALLEGATIONS OF PROFESSIONAL MISCONDUCT

4. Defendant is required by Oklahoma Administrative Code § 435:20-9-2(b) *et seq.*, to complete thirty (30) hours of approved continuing education every two years. Defendant’s due date for completion was by December 31, 2017.
5. Defendant failed to complete the continuing education hours required by December 31, 2017.

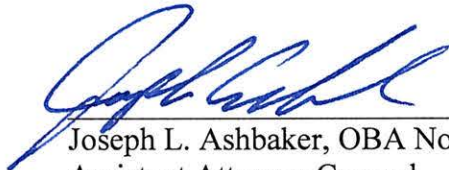
6. Further, in accordance with Oklahoma Administrative Code § 435:20-9-2(c), Defendant was required to complete double the continuing education hours, sixty (60), the following two years as a result of being late completing his education during the previous period. These double hours were due to be completed on December 31, 2019. Defendant did not complete the double hours by December 31, 2019.
7. Disciplinary action is required in this case pursuant to Oklahoma Administrative Code § 435:20-9-2(c).

II. VIOLATIONS

8. Based on the foregoing, the Defendant is guilty of professional misconduct as follows:
 - a. Effective January 1, 2004 and every two years thereafter, physical therapists will be required to show proof of forty (40) approved contact hours and Physical Therapist Assistants will be required to show proof of thirty (30) approved contact hours, in violation of Okla. Admin. Code § 435:20-9-2(b) *et seq.*
 - b. Any applicant for renewal who cannot meet the requirements for continuing education may not renew until deficient hours are obtained and verified. Additionally, within the next compliance period the licensee will be required to obtain double the required hours of approved continuing education. At least half of the required hours must be Category A. Proof of meeting the additional requirements, as verified by an audit, will be required in order to renew at the end of the next compliance period. Failure to meet these additional requirements will result in disciplinary action, in violation of Okla. Admin. Code § 435:20-9-2(c).

III. CONCLUSION

Given the foregoing, the undersigned requests 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 and any other appropriate action with respect to the Defendant's professional license, including an assessment of costs and attorney's fees incurred in this action as provided by law.



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VERIFICATION

I, Lisa Cullen, under penalty of perjury, under the laws of the State of Oklahoma, state as follows:

1. I have read the above Complaint regarding the Defendant, Benjamin Reeder, T.A.; and
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.

Lisa Cullen
Lisa Cullen, Licensing Director
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION

Date: 02/19/2020

Oklahoma County, Oklahoma
Place of Execution