

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

FILED

AUG 20 2004

STATE OF OKLAHOMA)
EX REL. THE OKLAHOMA BOARD)
OF MEDICAL LICENSURE)
AND SUPERVISION,)
)
Plaintiff)
)
v.)
)
WILLIAM E. WOOD, JR., PT)
LICENSE NO. PT2341,)
)
Defendant.)

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 04-05-2087

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, William E. Wood, Jr., PT, Oklahoma license no. PT2341, 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 therapists in the State of Oklahoma pursuant to 59 O.S. 887.1 *et seq.* and 59 Okla. Stat. §480 *et seq.*

2. Defendant, William E. Wood, Jr., PT, holds Oklahoma physical therapy license no. PT2341

3. On or about May 3, 2004, Defendant was admitted to Midwest Regional Medical Center on complaints of depression and withdrawal from prescription medications. At that time, a drug test was performed, which subsequently tested positive for Cocaine. Defendant admitted that he had smoked the Cocaine with a friend and had done so on more than one (1) occasion.

4. Defendant is guilty of unprofessional conduct in that he:

A. Is guilty of conduct unbecoming a person licensed as a physical therapist or physical therapist 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).


- 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. Used drugs, narcotics, medication, or intoxicating liquors to an extent which affects the professional competency of the applicant or licensee in violation of 59 O.S. §887.13(4).
- D. Engaged in the habitual intemperance or the habitual use of habit-forming drugs in violation of OAC 435:20-5-8(2).
- E. Was convicted of or confessed to a crime involving violation of the laws of this state in violation of OAC 435:20-5-8(4).
- F. 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).
- G. Participated in fraud, abuse and/or violation of state or federal laws in violation of OAC 435:20-5-8(8).
- H. Engaged in the habitual intemperance or addicted use of any drug, chemical or substance that could result in behavior that interferes with the practice of physical therapy and the responsibilities of the licensee in violation of OAC 435:20-5-8(13).
- I. 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).
- J. Was convicted of, or confessed to, or plead no contest to a felony or misdemeanor in violation of OAC 435:20-5-8(26).
- K. 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).

Conclusion

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 the revocation or suspension of the Defendant's license to practice as a physical therapist in the State of Oklahoma, 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 therapist in the State of Oklahoma.

Dated this 20th day of August, 2004 at 8:30 a.m.

Respectfully submitted,


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Oklahoma State Board of Medical
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