

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

FILED

OCT - 3 2003

STATE OF OKLAHOMA
EX REL. THE OKLAHOMA BOARD
OF MEDICAL LICENSURE
AND SUPERVISION,

Plaintiff

v.

JEREMY LEE BOHANNON, PT
LICENSE NO. PT2433,

Defendant.

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

Case No. 03-07-2680

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, Jeremy Lee Bohannon, PT, Oklahoma license no. PT2433, 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, Jeremy Lee Bohannon, PT, holds Oklahoma physical therapy license no. PT2433.

3. On or about April 22, 2003, Patient A began physical therapy treatment with Defendant. On or about June 13, 2003, Defendant allowed Patient A to discharge herself from treatment. The next day, on June 14, 2003, Defendant engaged in physical conduct with Patient A which was sexual in nature. Specifically, on this date, Defendant met Patient A at Sooner Fashion Mall in Norman, Oklahoma, gave her a gift certificate to Victoria's Secret, then invited her to his home and engaged in sexual intercourse with her.

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).

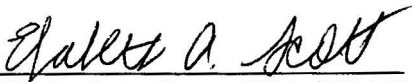
- B. Is guilty of any act in conflict with the ethics of the profession of physical therapy in violation of 59 O.S. §887.13(10).

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 3rd day of October, 2003 at 7:45

Respectfully submitted,


Elizabeth A. Scott, OBA #12470
Assistant Attorney General
State of Oklahoma
5104 N. Francis, Suite C
Oklahoma City, OK 73118

Attorney for the State of Oklahoma ex rel.
Oklahoma State Board of Medical
Licensure and Supervision