

**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.

**GENE WENDELL KNOX, PTA
LICENSE NO. TA277,**

Defendant.

FILED

JUN - 5 2003

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

CASE NO. 03-04-2653

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, Gene Wendell Knox, 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, Gene Wendell Knox, PTA holds physical therapy assistant license no. TA277 in the State of Oklahoma.

3. Beginning in mid-2002 and continuing through January 2003, Defendant was employed as a physical therapy assistant during which time he treated patient CLK. In January 2003, Patient CLK's physical therapy was cancelled. However, Patient CLK was unaware that her physical therapy had been cancelled. Defendant continued to visit Patient CLK after this time. During his visits, he kissed her and placed his hands beneath her shirt and fondled her breasts, at which time she told him to stop. In or around March 2003, Defendant grabbed Patient CLK's hand and placed it on his penis. At that time, Patient CLK asked Defendant if her therapy had been cancelled, at which time Defendant lied and told her that it had not been cancelled.

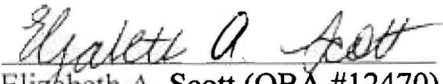
4. On or about April 23, 2003, Defendant was charged with FELONY SEXUAL BATTERY in the District Court of Tulsa County, State of Oklahoma.

5. 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 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).

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 5th day of June, 2003

Respectfully submitted,


Elizabeth A. Scott (OBA #12470)
Assistant Attorney General
5104 N. Francis, Suite C
Oklahoma City, OK 73154
Attorney for State ex rel.
Oklahoma Board of Medical Licensure and
Supervision