

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

STATE OF OKLAHOMA)	FILED
EX REL. THE OKLAHOMA BOARD)	
OF MEDICAL LICENSURE)	MAY - 2 2014
AND SUPERVISION,)	
)	OKLAHOMA STATE BOARD OF
Plaintiff,)	MEDICAL LICENSURE & SUPERVISION
)	
)	
v.)	Case No: 14-03-4930
)	
JUSTIN JAY LAIRD, AT,)	
LICENSE NO. AT288)	
)	
Defendant.)	

COMPLAINT

Plaintiff, State of Oklahoma ex rel. the Oklahoma State Board of Medical Licensure and Supervision (the “Board”), by and through its attorney, Matthew Ryan Stangl, Assistant Attorney General, for its Complaint against Justin Jay Laird, AT (“Defendant”), states and alleges as follows:

1. The Board is a duly authorized agency of the State of Oklahoma empowered to license and oversee the activities of athletic trainers in the State of Oklahoma pursuant to 59 Okla. Stat. § 480 *et seq.* and Oklahoma Administrative Code (“OAC”) 435:1-1-1 *et seq.*
2. Defendant, Justin Jay Laird, AT, holds athletic trainer license no. AT288 in the State of Oklahoma.

Prior History with the Athletic Trainers Advisory Committee

3. On August 29, 2012, Defendant appeared before the Athletic Trainers Advisory Committee in support of his application for reinstatement of his athletic trainer license. **He had allowed his license to expire for approximately eight (8) months, from September 2011 to May 2012.**
4. Defendant stated that in June of 2011 he had been audited by the National Athletic Trainer Association. Upon his return, he discovered that all of his documentation had been seized by the Oklahoma State Bureau of Investigation (“OSBI”) during the course of

its investigation into the Athletic Director of Tulsa Public Schools on charges of embezzlement. Defendant stated that he did not, therefore, receive the email regarding licensure renewal from the Board, but admitted it was his fault for not following up on it.

5. Defendant further stated that he worked as the Assistant Athletic Director from June 2011 to April 2012 and claimed that he did not work as an athletic trainer during the time that his license was lapsed. Defendant was not implicated in the OSBI investigation. The Committee recommended approval of Defendant's application and the Board reinstated his license.

Current Allegations of Unprofessional Conduct

6. On March 17, 2014, the current matter was initiated when Board Staff received a report that Defendant was practicing as an athletic trainer for Tulsa Public Schools with an expired license.
7. A check of the Board's database showed that Defendant listed Tulsa Public Schools as his employment address and that, indeed, his license had been expired since August 31, 2013, approximately seven (7) months.
8. An investigator traveled to Tulsa and met with a school administrator who confirmed Defendant was employed by Tulsa Public Schools as an athletic trainer and was currently working in that position. The school administrator was not aware that Defendant's license was expired – this led to Defendant's subsequent dismissal. In a follow-up interview with the investigator, Defendant admitted to knowing that his license was expired.
9. It was thereafter discovered that Defendant phoned the Board's licensing department in November of 2013. During that call, Defendant claimed that he had been trying to renew his application for three months. Board staff informed Defendant that he would need to apply for reinstatement of license and provided specific instructions on how to log in and fill out the application for reinstatement.
10. Defendant called again approximately three (3) months later in February of 2014. A member of the Board's licensing department returned his phone call and left a message, but did not hear back from Defendant until March of 2014. Board staff again provided detailed instructions on the reapplication process.
11. As of April 18, 2014, Defendant has still failed to apply for reinstatement of his athletic trainer license.
12. Based on the foregoing allegations, Defendant is guilty of unprofessional conduct in that he:
 - a) Failed to timely make application for renewal pursuant to OAC 435:25-11-1(6);

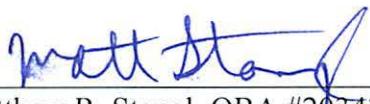
- b) Violated or conspired to violate the provision of this Act or Rules and Regulations issued pursuant to this Act. 59 Okla. Stat. § 532(A)(3); and OAC 435:25-11-1(8).

CONCLUSION

Plaintiff, State of Oklahoma, 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 an athletic trainer in the State of Oklahoma.

Dated this 29th of April, 2014.

Respectfully submitted,



Matthew R. Stangl, OBA #20343
Assistant Attorney General
State of Oklahoma
313 NE 21st Street
Oklahoma City, OK 73105

*Attorney for Plaintiff, State of Oklahoma
ex rel. Oklahoma State Board of
Medical Licensure and Supervision*