

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

**STATE OF OKLAHOMA, *ex rel.*,  
THE OKLAHOMA STATE BOARD  
OF MEDICAL LICENSURE AND  
SUPERVISION,**

**Plaintiff,**

**vs.**

**SEAN MICHAEL ROBERTS, P.T.,  
LICENSE NO. PT 3110,**

**Defendant.**

**FILED**

MAR 18 2021

OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE & SUPERVISION

**Case No. 20-01-5864**

**VERIFIED COMPLAINT**

The State of Oklahoma, *ex rel.*, the Oklahoma State Board of Physical Therapy Licensure and Supervision ("Board"), alleges and states as follows for its Complaint against Sean Michael Roberts, P.T. ("Defendant"):

**I. JURISDICTION**

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 Okla. Stat. § 480 *et seq.*
2. Defendant, Sean Michael Roberts, P.T., holds Oklahoma Physical Therapy license number 3110. The acts and omissions complained of herein were made while Defendant was acting as a physical therapist pursuant to the Physical Therapy license conferred upon him by the State of Oklahoma, and such acts and omissions occurred within the physical territory of the State of Oklahoma.

**II. ALLEGATIONS OF UNPROFESSIONAL CONDUCT**

3. On January 13, 2020, Board Compliance Coordinator, Gary Ricks received a call advising that Defendant had been arrested on or about November 8, 2019, in Cleveland County. Defendant was charged with Misdemeanor DUI and Possession of CDS/Oxycodone in Cleveland County Case Number CM-2019-2173.
4. According to the Norman Police Officers Affidavit, on November 8, 2019, Defendant was driving his vehicle and swerved into oncoming traffic and almost hit a curb. He was pulled over and showed signs of intoxication. On the passenger seat were six (6) loose Oxycodone pills, for which Defendant admitted he did not have a valid prescription. This

was confirmed by Board Investigator Roberts through a PMP check. Defendant was taken into custody and plead guilty to driving a motor vehicle under the influence of drugs and unlawful possession of CDS (Oxycodone).

5. Defendant was subsequently untruthful on his license renewal form dated December 26, 2019. On said renewal form, question Q stated "Since last renewal, have you been arrested, charged with, or convicted of a traffic violation involving the use of any drug or chemical substance, including alcohol?". Defendant answered "no", which was untrue.

### **III. CRIMINAL HISTORY**

6. Defendant was arrested on or about January 1, 2001 and charged with misdemeanor DUI in Cleveland County case CM-2001-21 to which Defendant plead guilty and received a Deferred sentence.

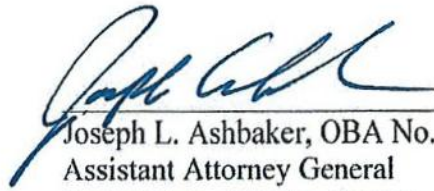
### **IV. VIOLATIONS**

7. Based on the foregoing, the Defendant is guilty of unprofessional conduct as follows:
  - a. Been 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 the profession in violation of Title 59 § 887.13(1)(9):
  - b. 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(b)(13):
  - c. Falsifying documents submitted to the Physical Therapy Committee or the Oklahoma State Board of Medical License and Supervision in violation of OAC 435:20-5-8(b)(20):
  - d. Failure to report to the Board any adverse action taken against him or her by another licensing jurisdiction (United States or Foreign), by any governmental agency, by any law enforcement agency, or by a court for acts or conduct similar to acts that would constitute grounds for action as defined by this section in violation of OAC 435:20-5-8(b)(32).

### **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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405/522.2974  
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**VERIFICATION**

I, Robbin Roberts, 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, Sean Michael Roberts, P.T.; and
2. The factual statements contained therein are true and correct to the best of my knowledge and belief.

  
Robbin Roberts, Investigator  
OKLAHOMA STATE BOARD OF MEDICAL  
LICENSURE AND SUPERVISION

Date: 2-4-21  
Oklahoma Co.


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Robbin Roberts, Investigator  
OKLAHOMA STATE BOARD OF MEDICAL  
LICENSURE AND SUPERVISION

Date: 2-4-21  
  
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