

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. )  
 )  
CARLEEN ALICIA RAHN, PTA )  
LICENSE NO. TA336, )  
 )  
 )  
Defendant. )

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OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE  
AND SUPERVISION

CASE NO. 04-07-2842

**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, Carleen Alicia Rahn, 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, Carleen Alicia Rahn, PTA holds physical therapy assistant license no. TA336 in the State of Oklahoma and is authorized to practice as a physical therapy assistant under the terms of a Voluntary Submittal to Jurisdiction entered July 21, 2005, with a five (5) year term of probation.

3. The Voluntary Submittal to Jurisdiction sets forth Defendant's terms of probation and provides that Defendant shall be on probation as follows:

F. Defendant will have the affirmative duty not to ingest any substance which will cause a body fluid sample to test positive for prohibited substances, including, but not limited to alcohol.

4. On or about December 17, 205, Defendant ingested a “fifth” of Vodka. Her parents found her and took her to Deaconess Hospital. She was then transported to a detox unit in Bethany, Oklahoma.

5. Based on the allegations stated above, Defendant is guilty of unprofessional conduct as follows:

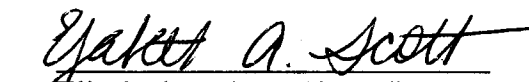
- A. Used ... intoxicating liquors to an extent which affects the professional competency of the licensee in violation of 59 O.S. §887.13(4).
- B. Is guilty of conduct unbecoming a person licensed as a physical therapist or physical therapy assistant or guilty of conduct detrimental to the best interests of the public or his profession in violation of 59 O.S. §887.13(9).
- C. 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).
- D. Is guilty of dishonorable or immoral conduct that is likely to deceive, defraud, or harm the public in violation of OAC 435:20-5-8(b)(5).
- E. Is guilty of habitual intemperance ... [to any] 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(b)(13).
- F. 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(b)(31).

6. These allegations raise serious concerns about Defendant’s ability to practice as a physical therapy assistant in the State of Oklahoma with reasonable skill and safety.

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 1<sup>st</sup> day of January, 2006.

Respectfully submitted,

  
Elizabeth A. Scott (OBA #12470)

Assistant Attorney General

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Attorney for State ex rel.

Oklahoma Board of Medical Licensure and  
Supervision