

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

FILED

APR - 4 2013

OKLAHOMA STATE BOARD OF
MEDICAL LICENSURE & SUPERVISION

STATE OF OKLAHOMA)	
EX REL. THE OKLAHOMA BOARD)	
OF MEDICAL LICENSURE)	
AND SUPERVISION,)	
)	
Plaintiff,)	
)	
v.)	Case No. 12-04-4529
)	
STEPHEN BULLARD, P.T.)	
LICENSE NO. PT4041)	
)	
Defendant.)	
)	

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, Scott Randall Sullivan, Special Prosecutor, and for its Complaint against the Defendant, Stephen Bullard, P.T., 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 physicians and surgeons in the State of Oklahoma pursuant to to 59 Okla. Stat. §480 *et seq*

2. Defendant Stephen Bullard, P.T., holds Oklahoma license no. PT4041.

3. This case resulted from an anonymous complaint on April 23, 2012 advising that Defendant had a felony conviction for cruelty to animals, specifically horses.

4. In Ottawa County Case No. CF-2011-353 eight (8) counts of Felony Cruelty to Animals were filed on 10-14-11 against Defendant. Defendant appeared in Ottawa County District Court and on 04-09-12, Defendant entered a plea of No Contest on all counts. Defendant was sentenced as follows:

A. Count 1 – Three (3) years deferred; \$250 Deferral Fee Assessment; \$250 Victim Compensation Assessment

B. Count 2 - Three (3) years deferred; \$250 Deferral Fee Assessment; \$250

Victim Compensation Assessment

- C. Count 3 - Three (3) years deferred; \$250 Deferral Fee Assessment; \$250 Victim Compensation Assessment
- D. Count 4 - Three (3) years deferred; \$250 Deferral Fee Assessment; \$250 Victim Compensation Assessment
- E. Count 5 - Three (3) years deferred; \$250 Deferral Fee Assessment; \$250 Victim Compensation Assessment
- F. Count 6 - Three (3) years deferred; \$250 Deferral Fee Assessment; \$250 Victim Compensation Assessment
- G. Count 7 - Three (3) years deferred; \$250 Deferral Fee Assessment; \$250 Victim Compensation Assessment
- H. Count 8 - Three (3) years deferred; \$250 Deferral Fee Assessment; \$250 Victim Compensation Assessment

5. On 04-11-12 the OCDR states, "Jail time five (5) days."

6. Defendant's public file at the Board showed he renewed his PT license on 02-01-12 and checked "NO" to each question including D as follows:

"Have you been arrested for, charged with, or convicted of a felony or misdemeanor other than a traffic violation?"

7. His prior Application was completed on 01-31-11. Defendant's felony charges were filed 10-14-11 and he was present in court on these charges on 11-21-11 and 01-25-12, both times prior to filling out his renewal.

8. On 08-24-12 Defendant appeared before the PT Committee without legal representation. He explained he had a verbal agreement with his cousin that she would take care of his horses; but that she failed to do so. Defendant said he thought the charges would be dismissed, so he admitted he used poor judgment and answered "NO" to question D on his renewal. He advised he plans to move to Missouri. After discussing the matter, the PT Committee recommended Defendant to appear before the Medical Board.

9. Defendant is guilty of unprofessional conduct in that he engaged in:

- A. Conviction or confession of a crime involving violation of the laws of this state as stated in the OAC Rule 435:20-5-8 (b) (4);
- B. Falsifying documents submitted to the Physical Therapy Committee or the

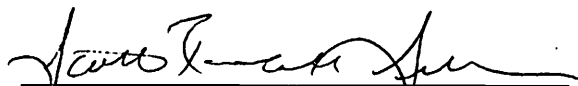
Oklahoma State Board of Medical Licensure and Supervision as stated in the OAC Rule 435:20-5-8 (b) (21);

- C. Obtaining or attempting to obtain a license, certificate or documents of any form as a physical therapist or physical therapist assistant by fraud or deception as stated in the OAC Rule 435:20-5-8 (b) (22);
- D. Conviction of, or confession of or plea of no contest to a felony or misdemeanor as stated in the OAC Rule 435:20-5-8 (b) (26); and
- E. 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 or conduct that would constitute grounds for action as defined in this section as stated in the OAC Rule 435:20-5-8 (b) (32).

CONCLUSION

WHEREFORE, the Plaintiff respectfully 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 and any other appropriate action with respect to Defendant's medical license, and an assessment of costs and attorney's fees incurred in this action as provided by law.

Respectfully submitted,



Scott Randall Sullivan, OBA #11179
OKLAHOMA STATE BOARD OF MEDICAL
LICENSURE AND SUPERVISION
101 N.E. 51st Street
Oklahoma City, OK 73105

Attorney for Plaintiff