

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

**FILED**

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

JUN - 5 2003

OKLAHOMA STATE BOARD OF  
MEDICAL LICENSURE & SUPERVISION

**Plaintiff,** )

**vs.** )

**CASE NO. 03-02-2607**

**LARRY DAVID CROSSLAND, PTA** )  
**LICENSE NO. PT478,** )

**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, Elizabeth A. Scott, Assistant Attorney General, and for its Complaint against the Defendant, Larry David Crossland, 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, Larry David Crossland, PTA holds physical therapy assistant license no. TA478 in the State of Oklahoma.

3. Beginning December 11, 2002 and continuing through December 31, 2002, Defendant provided physical therapy assistant services to Patient PRK on nine (9) separate occasions. During this time, Defendant provided treatment that was not consistent with the written plan of care formulated by the physical therapist who had performed the initial evaluation. Additionally, Defendant added and deleted treatment not authorized by the physical therapist.

4. Beginning November 4, 2002 and continuing through December 27, 2002, Defendant provided physical therapy assistant services to Patient WHK on six (6) separate occasions. During this time, Defendant provided therapy that was not consistent with the written

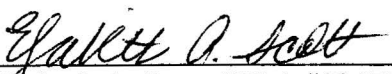
plan of care formulated by the physical therapist who had performed the initial evaluation. Additionally, Defendant added treatment not authorized by the physical therapist.

- 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. Practiced physical therapy other than under the referral of a physician, surgeon, dentist, chiropractor or podiatrist duly licensed to practice medicine or surgery or in the case of practice as a physical therapist assistant, has practiced other than under the direction of a licensed physical therapist in violation of 59 O.S. §887.13(1).
  - 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).

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 5<sup>th</sup> day of June, 2003.

Respectfully submitted,

  
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Oklahoma Board of Medical Licensure and  
Supervision