



State of Louisiana  
DEPARTMENT OF HEALTH AND HOSPITALS  
**Board of Physical Therapy Examiners**

2014 WEST PINHOOK ROAD, SUITE 701  
LAFAYETTE, LA 70508  
318/262-1043  
FAX 318/262-1054

BEFORE THE  
LOUISIANA STATE  
BOARD OF PHYSICAL THERAPY EXAMINERS

In The Matter Of	-	ADMINISTRATIVE COMPLAINT
Dameian Lewis, P.T.	-	-----
License No. 01877	-	ADMINISTRATIVE CASE NO.
Respondent	-	99-010

Acting in his official capacity as a member of the Louisiana State Board of Physical Therapy Examiners (the "Board") and investigating officer with respect to the above entitled matter, Paul A. Lamothe, Jr., P.T., as Complainant herein, respectfully asserts the following administrative complaint against the named respondent:

**Respondent**

1. Respondent, Dameian Lewis, P.T., is a physical therapist possessing Louisiana License No.01877 issued by the Board to practice physical therapy in the State of Louisiana pursuant to the Physical Therapy Practice Act of Louisiana for all pertinent times, more particularly, 1998 and 1999, LSA R.S. 37:2401 et seq.

**Facts**

2. Based upon information and belief, Respondent was licensed in Louisiana in 1995 and practiced physical therapy at Chalmette Medical Center in Chalmette, Louisiana.

3. Based upon information and belief, Respondent's license to practice in Louisiana lapsed at the expiration of the 1995 calendar year at which time Respondent practiced physical therapy in jurisdictions other than Louisiana.

4. Based upon information and belief, during July, 1998 Respondent practiced physical therapy in a jurisdiction other than Louisiana as a physical therapist employed at or under contract with Therapist Unlimited in Charlotte, North Carolina, at which time she

applied for reinstatement of her license in Louisiana.

5. Based upon information and belief, Respondent submitted her application for reinstatement for licensure in Louisiana on or about July 6, 1998. As required for reinstatement, Respondent submitted two letters of recommendation.

6. Based upon information and belief, the two licensed physical therapist whose recorded signatures on the referenced letters did not actually prepare nor sign such letters of recommendation; however, the two physical therapists earlier represented to Respondent that they would submit letters of recommendation to assist in her application for reinstatement.

7. Based upon information and belief, subsequent to Respondent being issued a license by reinstatement to practice in Louisiana during the latter part of 1998, it was discovered that the referenced two letters of recommendations were not actually signed nor prepared by the licensed physical therapists referenced above.

8. Based upon information and belief, Respondent is currently practicing in Louisiana as a licensed physical therapist employed at or under contract with Quality Care and Rehabilitation, Baton Rouge, Louisiana.

### **Violations Alleged**

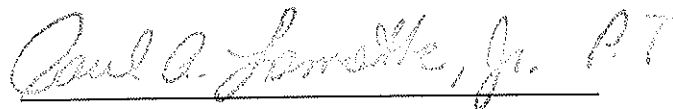
9. Respondent's attempt to obtain a license by fraud or misrepresentation is a violation of the Physical Therapy Practice Act of Louisiana and the Rules and Regulations promulgated by the Board. LSA R.S. 37:2404A, 37:2408 and 37:2413A (1) and (2); and Rules and Regulations, Title 46, Sections 167B, 327A and 325 et seq.

10. Respondent's violations of the provisions of the Physical Therapy Practice Act of Louisiana and the Rules and Regulations promulgated thereto constitute lawful grounds for the Louisiana State Board of Physical Therapy Examiners, upon due notice of hearing and proof of such violations, to refuse to license any applicant or other disciplinary action as provided by law. LSA R.S. 37:2413A (1) and (2) and 37:2414(4); and Rules and Regulations. Title 46, Sections 167B and 325 et seq.

**WHEREFORE**, Complainant prays that this Administrative Complaint be accepted for filing and docketed for hearing by the Board, and that, pursuant to the applicable provisions of the Physical Therapy Practice Act of Louisiana, LSA R.S. 37:2413, and the Louisiana Administrative Procedure Act, LSA R.S. 49:955-58, this matter be scheduled for administrative hearing before the Board, that notice of such hearing be duly served on the

Respondent, together with a certified copy or duplicate original of this Administrative Complaint, and that following due proceedings herein, the Board render a decision, upon written findings of fact and conclusions of law, suspending or revoking Respondent's license to practice physical therapy in the State of Louisiana, or such other disciplinary action as provided by law.

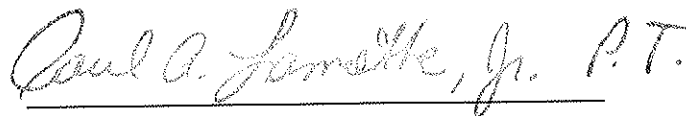
Submitted and Filed: June 24, 1999



Paul A. Lamothe, Jr., P.T.

**Verification**

**BEFORE ME**, the undersigned Notary Public, personally came and appeared: Paul A. Lamothe, Jr., P.T. who being duly deposed and sworn said that he is the investigating officer in the foregoing Administrative Complaint and that all the allegations of fact contained in the Complaint are true and correct to the best of her knowledge, information and belief.



Paul A. Lamothe, Jr., P.T.

**SWORN TO AND SUBSCRIBED** before me this 17<sup>th</sup> day of June, 1999.

  
Notary Public

Complainant Counsel:  
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