



State of Louisiana  
Department of Health and Hospital  
*Louisiana Physical Therapy Board*  
104 Fairlane Drive, Lafayette, Louisiana 70507  
337/262-1043 FAX 337/262-1054

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**In The Matter Of**

**JULIE ALEXANDER, P.T.A.**  
(License No. A4602)

**Complaint No. 2015-I-001**

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This **STIPULATION AND AGREEMENT FOR SURRENDER OF PHYSICAL THERAPIST ASSISTANT LICENSE** is made and executed by Julie Alexander, P.T.A. ("Mrs. Alexander")<sup>1</sup> who, at all times pertinent, has been a Louisiana Physical Therapist Assistant licensed to practice as a physical therapist assistant in the state of Louisiana, with and in favor of the Louisiana Physical Therapy Board ("LPTB" or "Board").

1. **Acknowledgment and Stipulations.** Mrs. Alexander hereby acknowledges, stipulates and agrees that:

(a) **Investigation.** The LPTB received a complaint on January 26, 2015. On January 27, 2015 Mrs. Alexander self-reported hospitalization following a suicide attempt. An Investigative Committee of the Board was formed consisting of Charlotte Martin, Board Executive Director; Al Moreau, Investigating Board Member; and Courtney P. Newton, complaint counsel. In the course of the investigation an Investigative Committee of the LPTB subpoenaed medical records related to Mrs. Alexander's suicide attempt and treatment thereafter. Review of medical records establish that Respondent ingested Adderall in a manner not consistent with physician prescription, has Alcohol Abuse Disorder, and struggles with multiple mental health disorders. On February 6, 2015 Respondent voluntarily signed an *Agreement to Abstain from the Practice*

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<sup>1</sup> Mrs. Alexander, at all times pertinent hereto, was a Louisiana Physical Therapist Assistant license by the Board as evidenced by license number A4602.

*of Physical Therapy* at the request of the Investigative Committee to ensure public protection until all disciplinary issues were fully resolved.

The Investigative Committee of the Board met with Mrs. Alexander and her unlicensed legal representative on March 25, 2015 at the Board office in Lafayette, LA, following proper notice and service. At this meeting it was determined that Mrs. Alexander was a candidate for the Confidential Recovering Physical Therapy Program. On April 1, 2015 Mrs. Alexander's legal representative contacted Board counsel expressing Mrs. Alexander's desire to postpone entrance into the confidential Recovering Physical Therapy Program until after her vacation due to concerns of availability of drug and alcohol testing facilities. The Investigative Committee of the Board agreed making participation contingent upon total abstinence from drugs and alcohol. The conditions of the participation in the Confidential Recovering Physical Therapy Program were clearly documented in a letter prepared by counsel on April 9, 2015 and received by Mrs. Alexander on April 11, 2015. On or about April 28, 2015, following her return from vacation, Respondent voluntarily submitted to a PEth alcohol test. Mrs. Alexander tested thirty-eight times higher than the permitted amount of Phosphatidylethanol, a biomarker for the measurement of binge or prolonged alcohol consumption, indicating ingestion of a significant amount of alcohol in the two or three weeks prior to testing. Following receipt of the positive PEth alcohol test the Investigative Committee initiated formal disciplinary proceedings due Mrs. Alexander's inability to abstain from alcohol, a threat to public safety.

**(b) LPTB Administrative Action.** On July 7, 2015, Mrs. Alexander was served through United States Postal Service certified mail, regular mail, and electronic mail with a Draft Administrative Complaint and given opportunity to respond to the allegations therein. On August 7, 2015 the Investigative Committee of the Board served Mrs. Alexander with a Formal Administrative Complaint and Notice of Hearing. A Notice of Rescheduled Hearing was served on Mrs. Alexander on September 16, 2015 notifying Mrs. Alexander that the hearing would be held on Wednesday, September 30, 2015, at 8:00 a.m. at the Board office in Lafayette, Louisiana.

**(c) Mrs. Alexander's Response.** On or about September 13, 2015, the LPTB office received a letter from Mrs. Alexander stating that she would not participate in the hearing and knew that her license would be revoked. Following receipt of this letter the Investigative Committee determined that Mrs. Alexander did not fully understand the disciplinary process and contacted her via telephone on September 18, 2015. During the September 18, 2015 telephone conference it was determined that Mrs. Alexander was no longer represented by counsel. The Investigative Committee explained the disciplinary process, proposed a Consent Order, and strongly recommended that Mrs. Alexander confer with legal counsel. On September 24, 2015 the Investigative Committee participated in a second conference call with Mrs. Alexander. During this telephone call Mrs. Alexander was represented by legal counsel, Jack Bride. Following much discussion Mrs. Alexander and her legal counsel determined that Mrs. Alexander would not sign a Consent Order because of its prohibition of alcohol and required random alcohol tests. On September 28, 2015, LPTB counsel received an email from Jack Bride informing the Investigative Committee that Mrs. Alexander would not participate in the hearing and desired to surrender her physical therapist assistant license.

(d) **Rights to Due Process.** Mrs. Alexander acknowledges that she has had the opportunity to thoroughly review the content of this Stipulation and Agreement for Voluntary Surrender of Physical Therapist Assistant License and that she has been fully informed of her rights to due process in connection with the pending administrative charges and that prior to final disciplinary action against she physical therapist assistant license she would be entitled to have notice of a hearing on the allegations and charges asserted against her and to have an administrative adjudication of such charges, at which time Mrs. Alexander would be entitled to be represented by legal counsel, to call witnesses and to present evidence on her own behalf in defense or in mitigation of the charges made, and to a decision thereon by the Board based upon written findings of fact and conclusions of law pursuant to La. Rev. Stat. §§ 49:955-965.

**2. Voluntary Surrender of License.** Notwithstanding her right to administrative hearing and a decision thereon as provided by La. Rev. Stat. §§ 49:955-965, in recognition of the stipulations set forth herein above and for the final disposition of the pending administrative action, Mrs. Alexander, nonetheless, hereby waives her right to formal adjudication and hereby voluntarily surrenders to the Board her license to practice as a physical therapist assistant in the state of Louisiana as evidenced by license number A4602. Mrs. Alexander acknowledges that she may submit an application for a Physical Therapist Assistant License not before September 29, 2020, and will be granted such license only upon a satisfaction of all requirements for licensure found within La. R.S. 37:2411 and the corresponding Board Rules and Regulations including, but not limited to, a finding of good moral character and fitness to practice as a physical therapist assistant. By her subscription hereto, Mrs. Alexander also hereby authorizes a member of the Investigative Committee to present this Stipulation and Agreement for Voluntary Surrender of Physical Therapist Assistant License to the Board for its consideration and to fully disclose to and discuss with the Board the nature and results of the investigation, and she waives any objection to such disclosures under La. Rev. Stat. §§ 49:960.

**3. Effect of Voluntary Surrender of License.** Mrs. Alexander acknowledges, stipulates and agrees that the voluntary surrender of her physical therapist assistant license effected here by in the presence of a pending administrative action shall have, and shall be deemed by the Board to have, the same effect as if the Board had entered an order of revocation upon the conclusion of formal administrative proceedings. Mrs. Alexander further acknowledges, stipulates and agrees that as a result of the voluntary surrender of her physical therapist assistant license effected hereby she shall not have any right or entitlement to reinstatement or renewal of her license to practice as a physical therapist assistant in the state of Louisiana.

**4 Termination of Proceedings.** By the voluntary surrender of her physical therapist assistant license and the attendant dismissal of the pending Administrative Complaint occasioned hereby, Mrs. Alexander, moreover, acknowledges, stipulates and agrees that she hereby waives any right to which she may be entitled pursuant to the Louisiana Administrative Procedure Act or to which otherwise may be afforded to her by law, to contest her agreement to, or the force and effect of, this document in any court relating to the matters referred to herein.

5. **Reimbursement of Costs.** Mrs. Alexander hereby agrees to partially reimburse the Louisiana Physical Therapy Board the cost of the investigation, initiation of disciplinary proceedings, legal fees, and administrative costs incurred in this matter in the amount of \$3,000.00. Mrs. Alexander acknowledges that this amount may be paid in a lump sum, or equal monthly installments, if arranged in advance with the Executive Director, over the course of five (5) years.

6. **Advice of Counsel.** Mrs. Alexander acknowledges that she has had the opportunity to seek the advice and guidance of legal counsel with respect to this Stipulation.

7. **Public Record.** Mrs. Alexander acknowledges, stipulates and agrees that this Stipulation and Agreement for Voluntary Surrender of Physical Therapist Assistant License shall be and shall be deemed to be a public record.

### STIPULATION, ACKNOWLEDGMENT AND AGREEMENT

I, **Julie Alexander, P.T.A.** hereby acknowledge, approve, accept, stipulate, agree and consent to entry of the above in forgoing this **29th** day of **September, 2015**.


  
Julie Alexander, P.T.A.

WITNESSES:

  
Signature

Edward POTER  
Printed Name

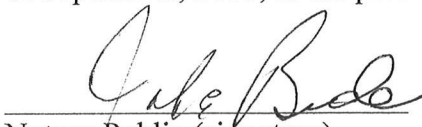
350 BAGBY PAUL CANE  
ST GABRIEL LA. 70776  
Address

  
Signature

Lori J Patterson  
Printed Name

6700 Maichac  
ST Gabriel, LA 70776  
Address

Sworn to and subscribed before me at St Gabriel, la, Louisiana, this 29<sup>th</sup> day of September, 2015, in the presence of the two stated witnesses.

  
Notary Public (signature)

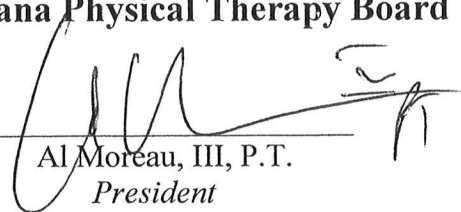
JOHN E BRIDE  
Printed Name/Notary # 03455

**ACCEPTANCE**

CONSIDERING THE ABOVE AND FORGOING, the Stipulation in Agreement for Voluntary Surrender of Physical Therapy Assistant License is hereby **APPROVED AND ACCEPTED** by the Louisiana Physical Therapy Board and effective, this 29<sup>th</sup> day of September, 2015.

**Louisiana Physical Therapy Board**

BY:



Al Moreau, III, P.T.  
*President*