BEFORE THE INDIANA ATHLETIC TRAINER BOARD
CAUSE NUMBER: 2019 ATB

IN THE MATTER OF THE LICENSE OF:)
CAYLA PUSEY, A.T.)
LICENSE NO: 36002830A (ACTIVE))

FILED
APR 17 2019
Indiana Professional Licensing Agency

PETITION FOR SUMMARY SUSPENSION

The State of Indiana ("Petitioner"), by Deputy Attorney General Patricia Gibson moves the Indiana Athletic Trainer Board ("Board") to suspend the license of Cayla Pusey, A.T. ("Respondent"), for ninety (90) days, and in support of its Petition states the following:

1. Respondent is an Athletic Trainer ("AT") in the State of Indiana having been issued license number 36002830A on July 5, 2017.

2. Respondent's address on file with the Indiana Professional Licensing Agency is 11531 Parent Road, New Haven, Indiana 46774. Another known address for Respondent is 4485 Coventry Parkway, Fort Wayne Indiana 46804.

3. This Board has jurisdiction to suspend Respondent's license in accordance with the provisions of Ind. Code ch. 4-21.5-4 and Ind. Code § 25-1-9-10.

4. At all times relevant, Respondent was employed by Optimum Sports Performance ("OSP"), and assigned to DB's school as an athletic trainer.

5. On April 12, 2019, Respondent was charged in Allen County, Indiana with Child Seduction, Level 5 Felony; and Child Seduction, Level 6 Felony; in Cause Number 02D06-1904-F5-000113. According to the charging information, DB is at least sixteen (16) years of age, but younger than eighteen (18) years of age, and the contact between Respondent and DB occurred sometime between May 1, 2018, and September 12, 2018.

6. The probable cause affidavit alleged that DB was interviewed by the Grant County Sheriff's Department, and during the recorded interview DB disclosed the following information: Respondent met DB through her employment as an AT at DB's school; Respondent and DB exchanged contact information so DB could consult Respondent about a sports related injury; DB spent the night at Respondent's residence approximately five (5) through (10) times; DB and Respondent engaged in oral sex; and Respondent and DB exchanged nude photos over their phones.

7. The probable cause affidavit further alleged that a forensic examination of DB's phone revealed the following information: Respondent and DB exchanged nude photos; Respondent and DB exchanged sexually oriented and graphic text messages including graphic descriptions by Respondent of DB's penis, descriptions of sexual acts Respondent and DB planned to perform, and a request from Respondent that DB send her a nude frontal photo showing DB holding himself; and Respondent sent a message referencing DB's age, making plans for when they could be together, and commenting to DB that he should not "Grow up."

8. The probable cause affidavit further alleged the following information: Respondent contacted DB's mother, SB, in person concerning continuing her relationship with DB; SB informed Respondent that continuing the relationship with DB was unacceptable; that SB would not report Respondent if Respondent ended the relationship, all contact with DB, and requested OSP transfer her from DB's school; and at the time of their conversation SB was unaware that DB's and Respondent's relationship was sexual.

9. The probable cause affidavit further alleged the following information: Respondent scheduled a meeting with OSP; Respondent requested to be transferred to another job location; Respondent informed OSP she had a relationship with a student but would not give

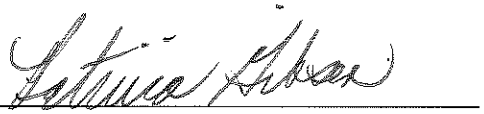
details; and Respondent informed OSP that she had met the student outside of school hours and off school property.

10. Due to the above facts, Respondent represents a clear and immediate danger to the public health and safety if allowed to continue to practice as an athletic trainer in the State of Indiana.

WHEREFORE, Petitioner requests that this Board set a hearing on this petition for summary suspension and suspend Respondent's license for ninety (90) days and for all other proper relief.

Respectfully submitted,

CURTIS T. HILL JR.
Attorney General of Indiana
Attorney Number: 13999-20

By: 
Patricia Gibson
Deputy Attorney General
Attorney Number: 12011-49

CERTIFICATE OF SERVICE

I certify that a copy of the "Petition for Summary Suspension" has been duly served upon Respondent listed below by United States mail, first-class, postage prepaid, on this 17th day of April, 2019.

Cayla Pusey, AT
11531 Parent Road
Westfield, IN 46074

Cayla Pusey, AT
4485 Coventry Parkway
Fort Wayne Indiana 46804

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