

**Teston v Ark. State Bd. Of Chiropractic Examiners, 04-420,
Supreme Court of Arkansas, April 7, 2005**

Evidence supported the Board's finding that physical therapist's treatments that caused patients' spines to "pop" were spinal manipulations under Ark. Code Ann. § 17-81-102(7) that could only be performed by licensed chiropractors, and that the was not practicing physical therapy, defined as passive manipulation of joints within normal range of motion.

