



(c) David S. Paul, 26777 Lorain Rd, Suite 306, North  
Olmsted, OH 44070.

**COUNT ONE**

5. Respondent is charged with violating 645 Iowa Admin. Code sections 242.2(4), 242.2(13), 645 IAC 242.2(14), 242.23(16) and 242.2(26), and Iowa Code section 147.9, by: knowingly making misleading, deceptive and fraudulent misrepresentations in the practice of psychology and engaging in unethical conduct; violating professional ethical standards; having his license to practice psychology in another state revoked pursuant to consent agreement; failing to report the revocation of his license to practice psychology in Ohio to the Iowa Board of Psychology Examiners within thirty (30) days as required; violating rules, regulations and laws of the State of Ohio which relate to the practice of psychology; failing to notify the Iowa Board of Psychology Examiners of a criminal conviction within thirty (30) days of the action; and failing to report a change in his address within thirty (30) days as required.

**CIRCUMSTANCES**

6. Respondent put his Iowa license to practice psychology on inactive status on June 30, 1996, and has not reported any change of address— either residence or office-- since that date. Respondent's current whereabouts, including any residence or office addresses, are unknown.

7. On January 13, 2003, the Ohio State Board of Psychology issued an Order summarily suspending Respondent's license to

practice psychology and filed disciplinary charges against him, alleging that he had sexual relationships with two (2) clients, billed third parties for psychotherapy during sessions in which he engaged in sexual relations with clients, and engaged in the negligent practice of psychology. A copy of the Order and Ohio statement of charges is attached to this Statement of Charges as

8. On September 29, 2003, Respondent entered into a Consent Agreement with the Ohio State Board of Psychology, according to which Respondent surrendered his license to practice psychology in the State of Ohio and waived his right to seek restoration of his Ohio license to practice psychology. Respondent's surrender of his license was recorded as a permanent revocation of his license by the Ohio State Board of Psychology. A copy of the Consent Agreement is attached to this Statement of Charges as "B".

9. In the Consent Agreement, Respondent falsely certified that he was not licensed in any other state:

C. DR. PAUL certifies that he does not hold a license or certificate to practice psychology in any other jurisdiction. He further stipulates and agrees that he will not apply for or otherwise seek such licensure or certification in any other jurisdiction.

(Consent Agreement page 3). In certifying he was not licensed in any other state, Respondent knowingly made a false, deceptive and untrue statement in violation of 645 Iowa Admin. Code section 242.2(4).

10. On November 2, 2002, the Municipal Court in Rocky River, Ohio, issued a Criminal Stalking Restraining Order against Respondent and in favor of a woman who had been Respondent's client. On August 6, 2003, Respondent pled guilty to the charge Menacing by Stalking, a misdemeanor first degree in violation of Ohio Statutes R. C. 2903.211 which provides:

(A) No person by engaging in a pattern of conduct shall knowingly cause another to believe that the offender will cause physical harm to the other person or cause mental distress to the other person.

(B) Whoever violates this section is guilty of menacing by stalking, a misdemeanor of the first degree.

A copy of the restraining order and journal entry reflecting Respondent's conviction is attached as "C".

11. Respondent failed to report this criminal conviction to the Board as required by 645 Iowa Admin. Code section 242.2(16).

12. Respondent has failed to keep the Board informed of his current address and/or to report any change in his addresses, both residence and office, as required by 645 Iowa Admin. Code section 242.2(26)

13. Respondent has engaged in conduct that violates the laws and rules governing the Board's licensees.

**The Statement of Charges is approved by the Board on July 14, 2004.**