STATE OF IOWA
BEFORE THE IOWA BOARD OF SOCIAL WORK

IN THE MATTER OF:	)	CASE NO. SW 01-017 & 03-008
	)	
ROBIN PATRICIA HARRIS	)	
	)	
	)	**MOTION TO DISMISS**
RESPONDENT.	)	**STATEMENT OF CHARGES**

COMES NOW the State of Iowa, by and through Assistant Attorney General Heather L. Adams, and moves to dismiss the Statement of Charges filed in this matter on August 9, 2004, stating in support thereof as follows:

1. The Statement of Charges filed against Respondent in this matter was based on a final report issued by the Iowa Department of Human Services (DHS) on February 10, 2004, which found Respondent's record keeping to be deficient in several areas and ordered repayment to DHS in the amount of $99,346.12. Respondent appealed that report. The matter was then referred to by DHS as "pending" for over five years.

2. DHS recently informed the Board that it is declining to pursue repayment in this case and would not be issuing a Demand for Repayment Letter to Respondent. It is unclear when DHS made this decision.

3. The Board's charges were based primarily on the DHS findings and report, which are not being pursued by that agency. Those charges should accordingly be dismissed. In addition, the remainder of the charges should be dismissed due to the age of the allegations and the connection between the allegations and the DHS findings and report.

WHEREFORE, the State of Iowa respectfully requests that Board dismiss the Statement of Charges filed in this matter of August 9, 2004.

This motion to dismiss statement of charges is approved by the board September 13, 2010.