

1 8. Mr. Wolf waives all rights to a contested case hearing or any further appeal.

2 [Redacted]
3 [Redacted]

4 Julia M. Cooley
5 Administrator, Board of Licensed Professional
6 Counselors and Therapists

1-3-03
Date

7 [Redacted]
8 Bill Wolf

1-23-03
Date

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10 Approved as to form only:

[Redacted]

13 Daniel H. Koenig, Attorney for Bill Wolf

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**BEFORE THE BOARD OF LICENSED
PROFESSIONAL COUNSELORS AND THERAPISTS
FOR THE STATE OF OREGON**

In the Matter of)	
)	
BILL WOLF)	NOTICE OF
)	PROPOSED REVOCATION OF
License No. C1054)	PROFESSIONAL COUNSELOR
)	LICENSE AND CIVIL PENALTY
)	AND NOTICE OF RIGHTS
)	
)	Case No.

The Oregon Board of Licensed Professional Counselors and Therapists (Board) is the state agency responsible for licensing, regulating and disciplining Licensed Professional Counselors and Licensed Marriage and Family Therapists in the State of Oregon.

Pursuant to ORS 675.745(1)(d) and OAR 833-060-0001 (4), the Board proposes to Revoke the professional counselor's license of Licensee for failing to conform to higher standards of personal conduct than those applying to the general public, and for failing to refrain from conduct that would bring discredit to the profession. The Board also proposes to assess a civil penalty of \$4,000 for four separate violations of this rule.

FACTUAL ALLEGATIONS

The following constitutes grounds for revocation:

1. At all relevant times, Bill Wolf has been licensed as a professional counselor issued by this Board under ORS 675.725.
2. Bill Wolf has been employed by Looking Glass Youth & Family Services for at least the past five years during which time he has counseled children and youths.
3. On January 16, 2002 an Agent of the United States Secret Service submitted an affidavit in support of a search warrant to a Magistrate of the United States District Court for the District of Oregon.
4. Based on the affidavit, the Magistrate authorized a search of the premises of Bill Wolf.
5. Bill Wolf, using the email address "sickperv1" conducted email and chat room correspondence on the internet with four separate undercover agents who posed as minor females. Bill Wolf solicited each of the undercover agents to perform sexual acts with him. The sexual acts were described in graphic terms. Many of the sexual acts were also described as being violent and hurtful to the recipient.

6. In the correspondence, Bill Wolf stated that he likes to hurt young girls because he is sadistic.
7. In the correspondence, Bill Wolf stated that he wanted to rape the undercover agents.
8. Bill Wolf sent over the internet a sexually explicit picture of himself to undercover agents.
9. Bill Wolf sent another picture of himself to undercover agents in which he is partially naked and holding a large knife.
10. Bill Wolf sent sexually explicit videos of children having sex with adults to undercover agents.

CONCLUSIONS AND PROPOSED SANCTIONS

The Board has authority under ORS 675.745(d) to discipline a Licensee for violation of one of its rules. The Board has promulgated a Code of Conduct for its licensees contained in OAR 833-060-0001. OAR 833-060-0001(4) states:

“(4) Department. A licensee accepts the obligation to conform to higher standards of personal conduct than those applying to the general public. A licensee will respect the traditions of the profession, and refrain from any conduct that would bring discredit to the profession”

The Board concludes that Licensee’s conduct, as detailed above, in whole or in part violates that portion of the Code of Conduct. Exchanging sexually graphic and violent communications with persons whom the Licensee believes to be minors is conduct that is of a much lower standard than what is expected of the general public. This type of conduct brings great discredit on the profession. Because the Board finds this conduct so egregious, it **proposes to impose the maximum sanction of revocation of Licensee’s license**

In addition to authority to revoke a license for violation of ORS 675.745(1)(d), the Board has authority to impose a civil penalty of \$1,000 for each violation. ORS 675.745(4). The Board concludes that Licensee’s correspondence with each undercover agent constitutes one violation of the Code of Conduct. Therefore, the Board **proposes to assess a civil penalty of \$4,000.**

NOTICE OF RIGHTS

Licensee has the right, if Licensee requests, to have a formal contested case hearing before a hearing officer to contest the matter set forth above. At the hearing, Licensee may be represented by an attorney, may testify on his behalf and may subpoena and cross-examine witnesses.

The request for hearing must be made in writing to the Board of Licensed Professional Counselors and Therapists, 3218 Pringle Rd. SE Suite 160, Salem, OR 97302-6312. The request for hearing must be received by the Board within 30 days from the mailing or

service of this notice and must be accompanied by a written answer to the charges contained in this notice.

The answer shall be made in writing to the Board and shall include an admission or denial of each factual matter alleged in this notice. It must also include a short plain statement of each relevant affirmative defense Licensee may have. Except for good cause, factual matters alleged in this notice and not denied in the answer shall be presumed admitted. Failure to raise a particular defense in the answer will be considered a waiver of such defense. New matters alleged in the answer (affirmative defenses) shall be presumed to be denied by the agency. Evidence shall not be taken on any issue raised in the notice answer.

If Licensee requests a hearing, before commencement of that hearing Licensee will be given information on the procedures, rights of representation and other rights of parties relating to the conduct of the hearing as required under ORS 183.413 and ORS 183.415.

If Licensee fails to request a hearing within 30 days, or fails to appear at the scheduled hearing, the Board may issue a final order by default and impose the above sanctions against Licensee. In issuing a final order by default, the Board will consider as evidence information in the agency file on the subject of the contested case hearing. That file will become part of the contested case record upon default for the purpose of proving a prima facie case.

Dated this 15 day of February, 2002

**BOARD OF LICENSED PROFESSIONAL
COUNSELORS AND THERAPISTS
FOR THE STATE OF OREGON**


By: Julia Cooley, Board Administrator

CERTIFICATE OF SERVICE

I certify that on February ____, 2002, I served the attached Notice of Proposed License Revocation and Civil Penalty via certified mail, Receipt Number _____, in a sealed envelope with postage prepaid to legal counsel for Bill Wolfe, addressed as follows:

Daniel H. Koenig
Attorney at Law
777 High Street, Ste 222
Eugene, OR 97440