

**BOARD OF CHIROPRACTIC EXAMINERS  
STATE OF OKLAHOMA**

<b>STATE OF OKLAHOMA, ex rel.</b>	)	
<b>BOARD OF CHIROPRACTIC EXAMINERS,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>Case No. 001-2013</b>
	)	
<b>Scott Owens, D.C.</b>	)	
	)	
<b>Respondent.</b>	)	

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**AGREED SETTLEMENT**

Comes now the Oklahoma Board of Chiropractic Examiners, Plaintiff herein, and Scott Owens, D.C., license number 2528, Respondent herein, and state as follows:

1. It is alleged in the Statement of Complaint in this matter that Respondent committed violations of the Oklahoma Board of Chiropractic Examiners Code of Ethics. To summarize, it is alleged:

During the time period of December 2007 through June 2008, and again from September 2008 through the end of October 2008, Scott Owens, D.C. engaged in unprofessional and inappropriate conduct arising out of treatment of a female patient as follows:

- (a) Requiring female patient to remove clothing that was unnecessary for the nature of the chiropractic examination,
- (b) Inappropriate comments regarding the patient's clothing and undergarments,
- (c) Touching the female patient in a manner inconsistent with any legitimate chiropractic procedure that made her feel uncomfortable.

2. Respondent denies each and every one of the allegations and makes no admission of liability or fault.

3. Said allegations set forth above, if proven, would constitute a violation of the Oklahoma Board of Chiropractic Examiners Code of Ethics, OAC 140:15-7-5(5), 140:15-7-(13)(B) and 140:15-7-5(13)(C).

4. Respondent recognizes and understands that he has the right to a formal, administrative hearing at which time he can present evidence and cross examine the board's witnesses and Respondent hereby voluntarily waives his right to such formal hearing and his right to any rehearing or judicial review related to the allegations contained in this Agreed Settlement.

5. Respondent has the right to consult with an attorney prior to entering into this Agreed Settlement and Respondent has done so.

6. Respondent admits that the Oklahoma Board of Chiropractic Examiners has jurisdiction of the parties and subject matter in this action.

7. Respondent hereby enters into this agreement upon his own voluntary action and volition.

8. This Settlement Agreement is subject to the Oklahoma Board of Chiropractic Examiners approval and will be effective only when the Board accepts it. Should the Board, in its discretion, not approve the Settlement Agreement, the Settlement Agreement is withdrawn and shall be of no evidentiary value, nor shall it be relied upon or introduced into any disciplinary action by any party hereto.

9. Respondent agrees that should the Board reject the Settlement Agreement and this case proceeds to hearing, Respondent shall assert no claim of bias, conflict or disqualification on

the part of the Board and/or its members or that the Board was prejudiced by review and discussion of this document of any records relating thereto.

10. In the event the Board does not accept the Settlement Agreement, a formal hearing will be heard on the allegations at a date to be announced.

11. If the Settlement Agreement is accepted by the Board, Respondent will abide by its terms effective upon the date of Board acceptance and subject to paragraph 12 below.

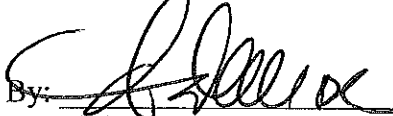
12. Therefore, in settlement of these allegations, Respondent hereby agrees and consents to the following:

1. Respondent will pay an administrative fine of Two Thousand Dollars (\$2,000) within twelve (12) months of the date the Board accepts the Settlement Agreement.
2. Respondent will successfully pass the Ethics and Boundaries Assessment Services, LLC ("EBAS") Essay Examination within nine (9) months of the date the Board accepts the Settlement Agreement.
3. Respondent will ensure that a female employee is in the examination room or treatment area at all times while Respondent is present and treating female patients.
4. Respondent, acknowledges the Board's authority to send a representative to his office for random visits to monitor his compliance with the terms of this Settlement Agreement.
5. Failure to successfully fulfill any term of this Settlement Agreement shall subject the Respondent to further discipline by the Board.

### **PUBLIC RECORD**

Respondent acknowledges that once adopted by the Board, this Consent Order and all associated documentation becomes a matter of public record, unless otherwise excluded by law.

Dated and entered this 18<sup>th</sup> day of December, 2014.

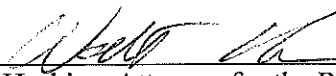
By:   
\_\_\_\_\_  
Dr. Christopher Waddell  
President, Oklahoma Board of Chiropractic Examiners

By: Marissa Lane  
Marissa Lane, Assistant Attorney General, Attorney for the Board

By: \_\_\_\_\_  
Walter Haskins, Attorney for the Respondent

By: Scott Owens  
Scott Owens, D.C.

By: \_\_\_\_\_  
Marissa Lane, Assistant Attorney General, Attorney for the Board

By:  \_\_\_\_\_  
Walter Haskins, Attorney for the Respondent

By: \_\_\_\_\_  
Scott Owens, D.C.