

6.

The allegations contained in paragraph 6 are denied for a lack of sufficient information. Moreover, this information was not made a part of the complaint and is therefore outside the scope of review.

7.

The allegations contained in paragraph 7 are denied for a lack of sufficient information. Moreover, this information was not made a part of the complaint and is therefore outside the scope of review

8.

The allegations contained in paragraph 8 are denied for a lack of sufficient information. Moreover, this information was not made a part of the complaint and is therefore outside the scope of review.

9.

The allegations contained in paragraph 9 are denied for a lack of sufficient information. Moreover, this information was not made a part of the complaint and is therefore outside the scope of review.

10.

The Ethical Principles and Code of Conduct adopted by the American Psychological Association and described in paragraph 10 of plaintiff's Petition was promulgated by the LSBEP on June 1, 2003, and therefore did not apply to acts taken prior to June 1, 2003.

11.

The allegations contained in paragraph 11 are denied for a lack of sufficient information. Moreover, this information was not made a part of the complaint and is therefore outside the scope of review. LSBEP specifically denies that a full hearing is warranted.

12.

LSBEP admits that it forwarded correspondence to plaintiff on April 15, 2008, and asserts that the correspondence is the best evidence of its content.

13.

The allegations contained in paragraph 13 are denied. Plaintiff did not request, nor was she entitled to, a "rehearing." Plaintiff requested reconsideration of the LSBEP's decision. Reconsideration was granted, and plaintiff's attorney was notified that the matter would be

reconsidered on June 20, 2008. Plaintiff's "additional information" was not received by the LSBEP until June 20, 2008 and was therefore not received in time to be considered at the June 20, 2008 meeting. Further, the "additional information" described in paragraph 13 was a summary only. Plaintiff submitted no documentation to LSBEP which would support said summary.

14.

The allegations contained in paragraph 14 of plaintiff's Petition are denied for a lack of sufficient information.

15.

The allegations contained in paragraph 15 of plaintiff's Petition are denied. This allegation was included in the information received by LSBEP on June 20, 2008 but not part of plaintiff's original complaint. Therefore, this allegation is outside the scope of review.

16.

The allegations contained in paragraph 16 of plaintiff's Petition are denied for a lack of sufficient information. Moreover this information was not part of plaintiff's original complaint and is outside the scope of review.

17.

The allegations contained in paragraph 17 of plaintiff's Petition are denied for a lack of sufficient information. Moreover this information was not part of plaintiff's original complaint and is outside the scope of review.

18.

The allegations contained in paragraph 18 are denied for a lack of sufficient information.

19.

The allegations contained in paragraph 19 are denied for a lack of sufficient information. The "facts" as described in paragraph 19 are not supported by evidence.

20.

The allegations contained in paragraph 20 are admitted.

21.

The allegations contained in paragraph 21 are admitted.

22.

The allegations contained in paragraph 22 are admitted.

23.

The allegations contained in paragraph 23 are denied for lack of sufficient information. The references to specific code articles are incorrect.

24.

The allegations contained in paragraph 24 are denied as written. Moreover, there is no evidence that such a defense was ever raised, supported or considered.

25.

The allegations contained in paragraph 25 are denied as a misstatement of law.

26.

The allegations contained in paragraph 26 are denied.

27.

The allegations contained in paragraph 27 require no answer. However, LSBEP asserts that plaintiff's complaint was not timely and was prescribed.

28.

The allegations contained in paragraph 28 are denied.

29.

The allegations contained in paragraph 29 are denied.

30.

The allegations contained in paragraph 30 require no answer. However, LSBEP denies that such a remedy is warranted.

31.

The allegations contained in paragraph 31 require no answer. However, LSBEP denies that such a remedy is warranted.

32.

The allegations contained in paragraph 32 require no answer. However, LSBEP denies that such a remedy is warranted.

AND NOW, further answering the allegations of plaintiff's Petition, LSBEP states:

FIRST DEFENSE

The Petition fails to state a cause of action upon which relief may be granted against LSBEP.

SECOND DEFENSE

The Petition fails to state a right of action upon which relief may be granted against LSBEP.

THIRD DEFENSE

Plaintiff's claims are prescribed.

FOURTH DEFENSE

The allegations raised in this Petition are preempted by federal law, and this Court lacks subject matter jurisdiction to review these complaints.

FIFTH DEFENSE

Any allegations set forth in this Petition which were not raised in plaintiff's original complaint filed with the LSBEP are outside the scope of judicial review.

SIXTH DEFENSE

The LSBEP acted appropriately and in accordance with statutory law at all times relevant to the claims in this Petition.

SEVENTH DEFENSE

LSBEP denies that Plaintiff is entitled to any relief in this matter whatsoever.

EIGHTH DEFENSE

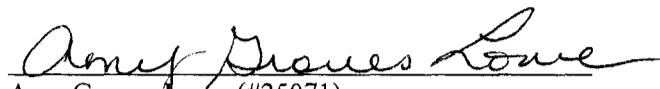
LSBEP reserves the right to amend its Answer to assert additional defenses as these may appear through discovery.

WHEREFORE, Louisiana State Board of Examiners of Psychologists prays:

1. That plaintiff's Petition be dismissed, with prejudice at plaintiff's cost;
2. For all general and equitable relief;
3. That undersigned be enrolled as counsel of record for Louisiana State Board of Examiners of Psychologists; and
4. That undersigned be served with copies of any written order or judgment rendered in the above entitled and numbered cause.

Respectfully submitted:

TAYLOR, PORTER, BROOKS & PHILLIPS LLP



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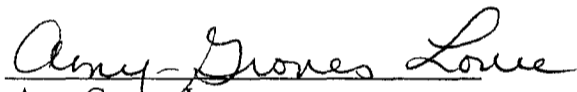
*Attorneys for Louisiana State Board of Examiners of
Psychologists*

CERTIFICATE

I certify that a copy of the foregoing was mailed through United States Mail, properly addressed, postage prepaid, to:

Mary E. Howell
Attorney at Law
P. O. Box 19043
New Orleans, LA 70179

Baton Rouge, Louisiana, this 25th day of August, 2008.


Amy Groves Lowe