

**BEFORE THE ALABAMA STATE BOARD
OF SOCIAL WORK EXAMINERS**

IN THE MATTER OF THE COMPLAINT) Case No.: No. 05-3876B-02
AGAINST)
DELORIS SPEARS,)
Respondent)
_____)

COMPLAINT

Upon consideration of the allegations set forth in this Complaint, the Complainant herein, the Investigative Committee of Alabama State Board of Social Worker Examiners (the “Board”), submits there is sufficient merit in such allegations to warrant the filing of this formal Complaint and alleges as follows:

I.

Respondent Deloris Spears heretofore had been duly issued a license to practice as a social worker by the Board and, at all times relevant to this Complaint, was licensed to practice as a social worker in Alabama.

II.

Since the issuance of such license, Respondent Deloris Spears has been accused of committing acts in violation of the code of ethics and/or the administrative code provisions governing the practice of social work in the State of Alabama, to wit:

1. On or around October 8, 2004, you tested positive in a drug test required by your employer.

2. It has been reported that your relationship with a certain client violated the appropriate client-social worker boundaries.
3. It has been reported that your work as a social worker was incompetent.

COUNT ONE

The allegation contained in paragraphs one and three of this complaint constitutes a violation of the Alabama State Board of Social Worker Examiner's Administrative Code, Sections 850-X-9.01(2)(a)(1)& (4) and 850-X-10.01 (2)(k) which prohibits a social worker from engaging in behavior that demonstrates incapacity or incompetence to practice social work.

COUNT TWO

The allegation contained in paragraph two of this complaint constitutes a violation of the Alabama State Board of Social Worker Examiner's Administrative Code, Sections 850-X-9.01(2)(a)(9) and 850-X-10.01 (2)(m) which prohibits engaging in a relationship with a client that violates appropriate client-social worker boundaries.

Done this 4th day of January, 2005.

ALABAMA STATE BOARD OF
SOCIAL WORK EXAMINERS
BY-

BRENDA W. HOLDEN
EXECUTIVE DIRECTOR

Address of Attorney for the Board

Ellen Leonard
Assistant Attorney General
11 South Union Street
Montgomery, AL 36130
(334) 353-9575
(334) 242-2433 (Fax)

Address of the Complainant

100 North Union Street, Suite 736
Montgomery, Alabama 36130-1620
(334) 242-5860

**BEFORE THE ALABAMA STATE BOARD
OF SOCIAL WORK EXAMINERS**

IN THE MATTER OF)
)
OF DELORIS SPEARS) CASE NO. 04-1407G-04
RESPONDENT.)

SUMMONS

TO: Ms. Deloris Spears
XXXXXXXXXX
XXXXXXXXXX

The complaint, which is attached to this Summons, is important and you must take immediate action to protect your rights. You are required to file with the Alabama State Board of Social Work Examiners an Answer, either admitting or denying each allegation in the Complaint. The address of the Alabama State Board of Social Work Examiners is:

100 North Union Street, Suite 736
Montgomery, AL 36130-1620

The answer must be filed within thirty (30) days from the date of delivery of this summons and complaint. Failure to file an answer within the time permitted, without good cause, shall be construed as an admission that the factual averments contained in the complaint are true.

Also, a copy of the Answer should be served on counsel for the Alabama State Board of Social Work Examiners:

Ellen Leonard
Assistant Attorney General
Alabama State House
11 South Union Street
Montgomery, Alabama 36130

Done this 4th day of January, 2005.

ALABAMA STATE BOARD OF
SOCIAL WORK EXAMINERS
BY:

BRENDA HOLDEN
EXECUTIVE DIRECTOR