

BEFORE THE INDIANA BEHAVIORAL
HEALTH AND HUMAN SERVICES BOARD
CAUSE NUMBER: 2011 BHSB 002

IN THE MATTER OF THE LICENSE OF)
ROBERT A. HUNDT, L.C.S.W.)
LICENSE NUMBER: 34004333A (ACTIVE))



COMPLAINT

The State of Indiana ("Petitioner"), by counsel, Deputy Attorney General Akia Haynes, on behalf of the Office of the Attorney General, and pursuant to Ind. Code § 25-1-7-7, Ind. Code ch. 25-1-5, Ind. Code § 25-23-1-7, the Administrative Orders and Procedures Act, Ind. Code ch. 4-21.5-3, and Ind. Code ch. 25-1-9, files its Complaint against the Indiana Clinical Social Worker license of Robert A. Hundt, L.C.S.W. ("Respondent"). In support, Petitioner states as follows:

FACTS

1. Respondent is a licensed as a Clinical Social Worker in the State of Indiana, holding license number 34004333A since January 24, 2001. Respondent's address on file with the Indiana Professional Agency is 21 Lupine Lane, Chesterton, IN 46304.
2. Respondent began seeing Patient A as a client in 2002.
3. On or about April 25, 2008, Respondent told Patient A that he had "feelings of affection for her" and that he would like to pursue a relationship with her. During that session, Respondent and Patient A mutually decided to end their clinical relationship and began dating. The parties reaffirmed that their clinical

relationship had ended on or about May 10, 2008, before meeting at Respondent's home to watch a movie.

4. During the course of the relationship, Respondent told family members, co-workers, and friends about his relationship with Patient A, but did not disclose that she was a former client. The Respondent considered the relationship serious, monogamous, and discussed the potential for marriage and children with Patient A.

5. The courtship between Patient A and Respondent ended in or around March of 2009 after Patient A informed Respondent that the relationship was causing her "emotional distress." Respondent acknowledged that the relationship caused Patient A harm and subsequently referred Patient A to another therapist, Leslie Marino, L.C.S.W. for clinical services.

6. Respondent told Petitioner about his courtship with Patient A. Specifically, Respondent admitted that he had a relationship with Patient A, that the relationship was "a horrible decision," and that he had "cross[ed] ethical boundaries restricting a relationship with a past client."

COUNT I

7. Paragraphs 1-6 are incorporated herein.

8. The Respondent's conduct as described above constitutes a violation of Ind. Code § 25-1-9-4(a)(4)(B) in that Respondent has continued to practice although he has become unfit to practice due to a failure to keep abreast of current professional theory or practice by violating 839 IAC 1-3-4(b), NASW Code of Ethics

1.06(c), NASW Code of Ethics 1.09(c), NASW Code of Ethics 1.16(d) by ending his professional relationship with Patient A for the purpose of pursuing a romantic relationship with her.

COUNT II

9. Paragraphs 1-8 are incorporated herein.

10. The Respondent's conduct as described above constitutes a violation of Ind. Code § 25-1-9-4(a)(3) in that Respondent has knowingly violated a state statute or rule, federal statute or regulation, regulating the profession in question as evidenced by Respondent's act of hiding Patient A's status as a former client from his friends, family, and co-workers, his own statements acknowledging that he was aware of the unethical nature of his romantic relationship with Patient A, and his statements accepting responsibility for initiating the relationship that caused harm to Patient A .

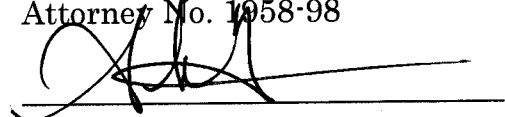
WHEREFORE, petitioner demands an order against the Respondent that:

1. Imposes the appropriate disciplinary sanction;
2. Directs Respondent to immediately pay all costs incurred in the prosecution of this case; and;
3. Provides any further relief as the Board deems just and proper.

Respectfully submitted,

GREGORY ZOELLER
Attorney General of Indiana
Attorney No. 1958-98

By: _____



Akia Haynes
Deputy Attorney General
Attorney No.: 27869-49

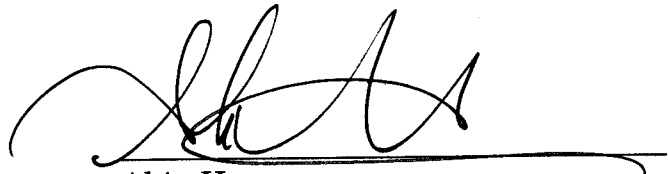
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CERTIFICATE OF SERVICE

I certify that a copy of the "Complaint" has been duly served upon the Respondent listed below, by United States mail, first-class, postage prepaid, on this 4th day of April, 2011.

Robert A. Hundt
21 Lupine Lane
Chesterton, IN 46304



Akia Haynes
Deputy Attorney General

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