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FILED WITH THE BOARD OF
PSYCHOLOGICAL EXAMINERS
ON *November 3, 2016*
J. Michael Walker

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STATE OF NEW JERSEY
DEPARTMENT OF LAW & PUBLIC SAFETY
DIVISION OF CONSUMER AFFAIRS
STATE BOARD OF PSYCHOLOGICAL EXAMINERS

IN THE MATTER OF THE SUSPENSION OR
REVOCATION OF THE LICENSE OF

RICHARD GEHA, Ph.D.
LICENSE NO. 35SI00120600

TO PRACTICE PSYCHOLOGY
IN THE STATE OF NEW JERSEY

Administrative Action

COMPLAINT

CHRISTOPHER S. PORRINO, Attorney General of New Jersey, by Alina Wells, Deputy Attorney General, with offices located at 124 Halsey Street, Fifth Floor, Newark, New Jersey, upon information and belief, by way of Complaint, says:

GENERAL ALLEGATIONS

1. Complainant, Christopher S. Porrino, Attorney General of New Jersey, is charged with enforcing the laws of the State of New Jersey, pursuant to N.J.S.A. 52:17A-4(h), and is empowered to initiate administrative disciplinary proceedings against persons licensed by

the New Jersey State Board of Psychological Examiners (the "Board") pursuant to N.J.S.A. 45:1-14 et seq.

2. The Board is charged with the duty and responsibility of regulating the practice of psychology by licensees in the State of New Jersey pursuant to N.J.S.A. 45:1-14 et seq. and N.J.S.A. 45:14B-1 et seq.

3. Respondent, Richard Geha, is a licensee of the Board of Psychological Examiners. Respondent holds license no. 35SI00120600 which is currently active.

4. Respondent is engaged in the practice of psychology with a principal address of 50 Dunkard Church Road, Stockton, New Jersey 08559.

5. A licensee shall not enter into or continue any treating relationship in which he or she has any family, personal, financial or beneficial interest other than that arising from the therapist-client relationship. N.J.A.C. 13:42-10.13(c).

6. A psychologist cannot enter into a dual relationship. Entering into any business relationship or paying or bartering for any services provided by any current client shall also be prohibited. N.J.A.C. 13:42-10.13(d).

7. A licensee who recognizes the existence of a conflict of interest or dual relationship shall take action to terminate the conflict or the dual relationship. N.J.A.C. 13:42-10.13(e).

8. A licensee shall not enter into financial arrangements with clients which are likely to impair professional judgment. N.J.A.C. 13:42-10.13(f).

9. Initials are being used in this Complaint to protect the confidentiality of patients referenced herein as W.B., H.P., and L.R. These patients' identities are known by the Respondent and have been made known to the Board.

COUNT I

10. Complainant repeats and realleges the General Allegations above as if fully set forth herein.

11. Respondent treated H.P. for twelve (12) years, in psychoanalytic sessions two (2) to three (3) times per week.

12. In 2009, after approximately nine (9) years of psychoanalytic therapy with Respondent, H.P. purchased two (2) horses from Arabians, Limited, a Texas business which was affiliated with Thornewood Farm, LLC in Stockton, New Jersey. During all relevant times to this Complaint, Thornewood Farm was owned by Respondent and his wife, and operated by Respondent's wife. The horses purchased by H.P. were boarded at Thornewood Farm.

13. Respondent appeared in internet advertisements for Thornewood Farm.

14. H.P. attended a seminars at Thornewood Farm for persons interested in purchasing Arabian horses.

15. Respondent introduced the owners of Arabians, Limited, to H.P. at a seminar at Thornewood Farm.

16. Respondent conducted psychoanalytic treatment sessions for H.P. at an office located at Thornewood Farm.

17. Respondent discussed the horses purchased by H.P. during H.P.'s psychoanalytic therapy sessions.

18. Respondent invited horse owners, including H.P., to group outings, including a New York showing of a play written by Respondent.

19. Respondent negotiated the purchase of several horses from H.P. to Respondent, his wife, and Thornewood Farm.

20. Respondent violated the therapist/client relationship by facilitating or entering into business transactions with H.P. for the sale, boarding and purchase of several horses. By failing to take actions to terminate this impermissible dual relationship, Respondent failed to appropriately safeguard the therapist/client relationship.

21. The actions of Respondent described herein evidences conduct which supports the revocation or suspension of Respondent's license under N.J.S.A. 45:1-21(e) and (h), specifically N.J.A.C. 13:42-10.13(c), (d), (e) and (f).

COUNT II

22. Complainant repeats and realleges the General Allegations and the allegations of Count I, above, as if fully set forth herein.

23. A psychologist shall prepare and maintain client records, pursuant to N.J.A.C. 13:42-8.1.

24. Respondent did not maintain client records for H.P. Respondent contended that this omission was due to H.P.'s discussion of issues of a criminal nature during sessions.

25. Respondent was asked to provide client records for two additional clients, W.B. and L.R. Respondent provided only billing statements for W.B. and L.R. These monthly billing statements included the name and address of the client, the dates of visits, the

diagnostic code, the amount billed per session and the total amount due.

26. Respondent's client records for W.B. and L.R. omitted the client complaint on intake, medical history, past and current medications, social history, findings on appropriate examinations, raw data and interpretations of tests administered, current functional impairment and rating levels, contemporaneous and dated progress or session notes including specific components of treatment, evaluation or consultation, dates of all treatments, evaluation or consultation sessions, evaluation of progress and a prognosis.

27. The actions of Respondent described herein constitute a failure to properly prepare and maintain client records, in violation of N.J.A.C. 13:42-8.1. This evidences conduct which supports the revocation or suspension of Respondent's license under N.J.A.C. 45:1-21 (d), (e) and (h).

WHEREFORE, Complainant Attorney General respectfully demands the entry of an order against Respondent Richard Geha, Ph.D., as follows:

1. For the revocation or suspension of Respondent's license to practice psychology pursuant to N.J.S.A. 45:1-21;

2. Imposing penalties upon the Respondent for each separate offense set forth herein, pursuant to N.J.S.A. 45:1-18.1 et seq., N.J.S.A. 45:1-22(b) and N.J.S.A. 45:1-25;

3. Imposing costs upon the Respondent, including investigative costs, fees for expert witnesses, attorney's fees and costs of

hearing, such as transcript costs, pursuant to N.J.S.A. 45:1-25(d);
and

4. For such other and further relief as the Board shall deem
just and appropriate.

CHRISTOPHER S. PORRINO
ATTORNEY GENERAL OF NEW JERSEY

By: Alina Wells
Alina Wells
Deputy Attorney General

Dated: November 3, 2016