

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

-----X
JULIE ALLEMAN, JULIET CATRETT, and P. :
WELLNESS INSTITUTE, LLC :

Plaintiffs, :

v. :

SHANNAE N. HARNESS, *et al.* :

Defendants. :

Case No. 3:24-cv-00877

Judge John deGravelles

Magistrate Judge Scott D. Johnson

AMENDED COMPLAINT

-----X

INTRODUCTION

1. Defendants in this case claim that Louisiana law precludes most residents of Louisiana from using psychology to aid others, asserting that this constitutes the “practice of psychology” that is only permitted by licensed psychologists. This threatens a whole host of individuals (those with psychological training or knowledge) with criminal and civil sanctions for engaging in quintessential First Amendment speech: providing advice and guidance. *Serafine v. Branaman*, 810 F.3d 354, 369 (5th Cir. 2016) (“The ability to provide guidance about the common problems of life – marriage, children, alcohol, health – is a foundation of human interaction and society, whether this advice be found in an almanac, at the feet of grandparents, or in a circle of friends. There is no doubt that such speech is protected by the First Amendment.”).

2. Because persons familiar with psychological principles, methods, and procedures have a First Amendment right to speak to others using that knowledge, they also have a First Amendment right to describe accurately their ability and skills. Plaintiffs are two such persons. Although not licensed psychologists, they have studied and trained in psychology. What they cannot do, under Louisiana law, is tell the truth about that. But the First Amendment protects truthful

speech and, accordingly, defendants' efforts to enforce a Louisiana law to preclude such truthful speech should be enjoined.

3. Plaintiffs in this case are not challenging most aspects of the licensing of psychology in Louisiana, and there are some areas of practice that only licensed psychologists may lawfully perform in Louisiana, primarily certain types or categories of psychological testing. Yet there are several other lawful professions recognized and regulated under Louisiana law that also require some psychological training and knowledge, whose practitioners are licensed to provide, for example, addiction, marriage and family, and other counseling. All these professions and their respective licensing schemes can and generally do operate harmoniously, except for one provision of Louisiana law that is so overbroad in its description of the exclusive "practice of psychology" and the many ways one can "represent" oneself as a licensed psychologist that it violates the First Amendment.

4. The offending provision of Louisiana law, La. R.S., Section 37:2352, does two things that violate the free speech of many professionals and persons in the State. One subsection states that a person represents himself as a licensed psychologist by, *inter alia*, using any title or description of services incorporating the words "psychology," "psychological," or "psychologist," which is wildly overbroad. Many distinct and lawful professions employ psychological principles, such as sports psychologists and marriage counselors. And what parent doesn't also use psychology and psychological principles with their children? A law that renders unlawful truthful speech about other licensed professions or the daily life of most residents violates the First Amendment.

5. Another subsection of Section 37:2352 defines the "practice of psychology" so broadly that it overlaps and describes the practice of other licensed professions in Louisiana as well

as others' speech. This overbroad definition of the practice of psychology conflicts with the licensing and practice parameters of other professions, but it also violates the First Amendment if it precludes those other practices or others' speech.

6. This case is not about the licensing requirements for the different professions that Louisiana recognizes and regulates – or the lawful scope of practice that each profession allows. It is about overbroad provisions in the chapter concerning licensed psychologists that provides that only licensed psychologists may use certain magic words, including the adjective “psychological,” when they describe their work, or use psychological principles in speaking with clients. Since there are many truthful uses of that word that are not misleading, such prohibition and the overbroad definition of the practice of psychology must yield to the First Amendment.

JURISDICTION AND VENUE

7. This action arises under the U.S. Constitution and law of the United States. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1343.

8. Venue is proper in this district because all of the parties have their offices in this district.

PARTIES

9. Plaintiffs Julie Alleman and Juliet Catrett are the owners of Plaintiff P. Wellness Institute, LLC, a Louisiana limited liability corporation. P. Wellness Institute has its office in the City of Baton Rouge, which is in East Baton Rouge Parish.

10. Defendant Shannae N. Harness is the Chair of the Louisiana State Board of Examiners of Psychologists (the “Board”), and is sued in her official capacity.

11. The Board is authorized by statute to enforce rules regulating psychology in

Louisiana.

12. Defendant Matthew Holcomb is the Vice Chair of the Board, and is sued in his official capacity.

13. Defendants T. Shavaun Sam, Marc Zimmermann, and Shawanda Woods-Smith are members of the Board, and are sued in their official capacities.*

14. Defendant Jaime Monic is the Executive Director of the Board and responsible for enforcing its decisions. She is sued in her official capacity.

15. Defendant Courtney Papale Newton is the Executive Counsel and Prosecuting Attorney for the Board, and is responsible for pursuing legal action on behalf of the Board. She is sued in her official capacity.

16. Together, the defendants enumerated in paragraphs 10 and 12-15 are referred to as the Board Defendants. In enforcing the laws identified below, each of them acts under color of state authority.

17. The Board is normally comprised of five licensed psychologists and one consumer. La. R.S. § 37:2353(A)(1). Currently, the position for the consumer representative on the Board is vacant. All psychologist appointments are from a list provided by the Louisiana Psychological Association. La. R.S. § 37:2353(A)(2).

18. The list results from an election in which persons qualified for board membership

* According to the Board's website, Michelle Moore, named as a Board member in the initial complaint in this action, is no longer a member of the Board and has been replaced by Marc Zimmermann. Pursuant to Fed. R. Civ. P. 25(d), Marc Zimmermann is "automatically substituted" as a party. Similarly, the Board's website indicates that Matthew Holcomb has replaced T. Shavaun Sam as Vice Chairperson. Finally, the website also indicates that Chairperson Harness's term will end on June 30, 2025.

may nominate themselves and in which licensed members of the Louisiana Psychological Association vote. La. R.S. § 37:2353(A)(2).

19. Defendant the District Attorney for the East Baton Rouge Parish (“EBRP DA”) is responsible for bringing prosecutions of violations of Louisiana law in Baton Rouge. In enforcing the law discussed below, that person acts under color of state authority.

STATUTORY BACKGROUND

20. Title 37 of Louisiana law sets forth rules governing professions. Chapter 28 of that title sets forth rules governing the practice of psychology.

21. Part of Chapter 28, Section 37:2360, entitled “Violations and Penalties,” states that it “shall be a misdemeanor . . . [f]or any person not licensed in accordance with the provisions of this Chapter . . . to engage in the practice of psychology.” It is also a misdemeanor “[f]or any person not licensed in accordance with the provisions of this Chapter . . . to represent himself as a psychologist.” La. R.S. § 37:2360(A).

22. Section 37:2352(7) defines the “practice of psychology” as

the observation, description, evaluation, interpretation, and modification of human behavior, by the application of psychological principles, methods, and procedures, for the purpose of eliminating symptomatic, maladaptive, or undesired behavior, and of improving interpersonal relationships, work and life adjustment, personal effectiveness, behavioral health, and mental health. The practice of psychology includes but is not limited to psychological testing and evaluation or assessment of personal characteristics such as intelligence, personality, abilities, interests, aptitudes, and neuropsychological functioning; counseling, psychoanalysis, psychotherapy, hypnosis, stress management, biofeedback, behavior analysis and therapy; diagnosis and treatment of mental and emotional disorder or disability, alcoholism and substance abuse, and of the psychological aspects of physical illness, accident, injury, or disability; psycho educational evaluation, therapy, remediation, and consultation. Psychological services may be rendered to individuals,

families, groups, institutions, organizations, and the public. The practice of psychology shall be construed within the meaning of this definition without regard to whether payment is received for services rendered.

23. Section 37:2352(9) provides that “[a] person represents himself to be a psychologist by using any title or description of services incorporating the words ‘psychology,’ ‘psychological,’ or ‘psychologist,’ or by using any other terms which imply that he is qualified to practice psychology or that he possesses expert qualification in any area of psychology, or if that person offers to the public or renders to individuals or to groups of individuals services defined as the practice of psychology.” (This amended complaint will sometimes refer to “psychology,” “psychological,” and “psychologist” as the “three prohibited words.”)

24. “Persons” include “an individual, firm, partnership, association, or corporation.” La. R.S. 37:2352(5).

25. The statute does not further define the phrase “psychological principles, methods, and procedures.”

26. Defendant EBRP DA is responsible for prosecuting misdemeanors under La. R.S. § 37:2360(A) in East Baton Rouge Parish.

27. The Board has the authority to investigate possible violations of the Chapter 28 of Title 37 of Louisiana law and to seek injunctions against such violations in a court of competent jurisdiction. La. R.S. § 37:2361.

28. The Board considers it a “violation” of Chapter 28 of Title 37 for persons who are not licensed as psychologists under Louisiana law to “engage in the practice of psychology” in any of the ways set forth in Section 37:2352(7) or to “represent themselves as psychologists” in any of the ways set forth in Section 37:2352(9).

FACTUAL BACKGROUND

A. Plaintiffs' Experience And Qualifications

29. Plaintiff P. Wellness Institute offers counseling for adults (age 18 and up). It specializes in the treatment of trauma-related disorders, mood disorders, and anxiety disorders.

30. Plaintiff Julie Alleman is a Licensed Professional Counselor, a Licensed Marriage and Family Therapist, and a Licensed Addiction Counselor under the laws of Louisiana. She has studied principles, methods, and procedures of psychology and uses those principles in her work at P. Wellness Institute for the purpose of eliminating symptomatic, maladaptive, or undesired behavior, and of improving interpersonal relationships, work and life adjustment, personal effectiveness, behavioral health, and mental health.

31. Alleman obtained a Bachelor of Science degree with a double major in Psychology and Sociology. After obtaining her undergraduate degree, she studied at Southeastern Louisiana University, where she received a Masters of Education in Community Counseling. At SLU, she took a wide variety of courses related to psychological topics, including classes that taught about diagnosing psychological disorders using the DSM. ("DSM" is the Diagnostic and Statistical Manual of Mental Disorders, a standard reference for identifying psychological disorders published by the American Psychiatric Association.)

32. After obtaining her Licensed Addiction Counselor credential, Alleman began working in private practice at Baton Rouge Christian Counseling Center. In her practice, she conducted individual, family, and group psychotherapy. While there, she completed her internship requirements and examination for both her Professional Counselor and Marriage and Family licenses.

33. Plaintiff Juliet Catrett is a Licensed Clinical Social Worker under the laws of Louisiana. She has studied principles, methods, and procedures of psychology and uses those principles in her work at P. Wellness Institute for the purpose of eliminating symptomatic, maladaptive, or undesired behavior, and of improving interpersonal relationships, work and life adjustment, personal effectiveness, behavioral health, and mental health.

34. Catrett studied at Tulane University, where she received a Masters of Social Work degree. At Tulane, she took a wide variety of courses related to psychological topics, including “Psychodynamic Psychotherapy/DSM,” in which she learned about diagnosing using the DSM.

35. As part of the program at Tulane, Catrett had a field placement at Jefferson Parish Human Services Authority in New Orleans. Her fieldwork with the Adult Mental Health Program there provided an opportunity to apply her Psychodynamic Psychotherapy/DSM course work in the diagnosing and treatment of adults whose chief complaints were the unrelenting symptoms of a psychological disorder. The majority of the clients she diagnosed and treated had co-occurring, that is multiple, psychological disorders that manifested persistent and severely debilitating symptoms of psychosis, addiction, depression, and anxiety.

36. Catrett completed 3000 hours postgraduate social work experience under supervision of a board approved clinical supervisor and 96 face-to-face hours of supervision.

37. Each of Alleman and Catrett studied the history of psychology and the different theories of psychology (*e.g.*, those of Jung or Freud).

38. Each also studied and learned Erikson’s stages of psychosocial development. Dr. Erickson maintained that there were eight stages of psychosocial development, from infancy to adulthood. According to this theory, during each stage, an individual undergoes a psychosocial crisis

as his or her psychological needs conflict with the needs of society.

39. Each also learned how to make diagnoses of different mental and emotional disorders, pursuant to the DSM. In addition, they learned to identify individuals with more than one psychological disorder, and to use differing psychological treatments and interventions.

40. In their current practice, Alleman and Catrett diagnose and treat severe mental illness, major disorders, and mental disorders, including individuals with complex clinical presentations including co-occurring disorders. They specialize in psychological disorders resulting from trauma. Each is qualified and able to use (*inter alia*) EMDR (Eye Movement Desensitization and Reprocessing) or Brainspotting for PTSD (Post Traumatic Stress Disorder) and other serious disorders.

41. EMDR therapy was developed in the late 1980s by psychologist Francine Shapiro. It is a structured psychotherapy that primarily focuses on treating individuals who have experienced distressing, traumatic events. The idea behind EMDR is that those traumatic memories, when unprocessed, can become “stuck” in the brain, leading to a wide array of emotional and psychological difficulties. The therapist uses speech to change the way the memory is stored in the brain.

42. Brainspotting therapy was developed in the early 2000s by a psychotherapist, David Grand. In Brainspotting, the therapist uses talk therapy to find a spot in the patient’s field of vision that is associated with a painful memory. This makes therapy, again using speech, addressing the painful memory more effective.

43. In addition to EMDR and Brainspotting, Alleman and Catrett are familiar with, and utilize, a whole host of other psychological methods, including more general psychotherapy,

hypnosis, stress management, addiction therapy, and psychoeducation. They also have studied, and are familiar with, “psychological aspects of physical illness, accident, injury, or disability” (La. R.S. 37:2352(7)), and they use their knowledge of these areas in their diagnoses and treatments.

44. Psychoeducation is the process of educating a client by speaking with him or her about diagnosis, symptoms, and methods of treatment. In many cases, such educating leads to better adherence to treatment protocols and improved outcomes.

45. Louisiana law permits Alleman and Catrett to use psychotherapy with their clients. La. R.S. §§ 37:1103(10) (“Practice of mental health counseling’ means rendering or offering prevention, assessment, diagnosis, and treatment, which includes psychotherapy, of mental, emotional, behavioral, and addiction disorders . . .”) and 37:2708(B) (“Treatment methods [for licensed clinical social workers] include the provision of individual, marital, couple, family, and group psychotherapy.”).

46. Ultimately, using the psychological knowledge and methods they have acquired over time, Alleman and Catrett offer their clients psychological assistance, for improving their clients’ lives. Their product is speech protected by the First Amendment.

47. Plaintiffs Alleman and Catrett clearly identify the licenses that they possess. They have never represented to the public or told their clients that they are licensed psychologists.

B. Plaintiffs’ Use Of Psychology Is Consistent With Their Professional Training, But Defendants Still Contend That It Is Illegal

48. Alleman and Catrett observe and evaluate their clients’ behavior by the application of psychological principles, methods, and procedures, for the purpose of aiding those clients to eliminate undesired behavior and of improving interpersonal relationships.

49. Louisiana law *permits* Alleman and Catrett to treat their clients consistent with their professional training and code of ethics. La. R.S. § 37-2365(A).

50. Using psychological principles, methods, and procedures, for the purpose of eliminating symptomatic, maladaptive, or undesired behavior, and of improving interpersonal relationships, work and life adjustment, personal effectiveness, behavioral health, and mental health is consistent with Alleman's professional training and code of ethics as a Licensed Professional Counselor and a Licensed Marriage and Family Counselor. She does, in fact, so use those principles, methods, and procedures for those purposes.

51. Using psychological principles, methods, and procedures, for the purpose of eliminating symptomatic, maladaptive, or undesired behavior, and of improving interpersonal relationships, work and life adjustment, personal effectiveness, behavioral health, and mental health is consistent with Alleman's professional training and code of ethics as a Licensed Addiction Counselor. She does, in fact, so use those principles, methods, and procedures for those purposes.

52. Using psychological principles, methods, and procedures, for the purpose of eliminating symptomatic, maladaptive, or undesired behavior, and of improving interpersonal relationships, work and life adjustment, personal effectiveness, behavioral health, and mental health is consistent with Catrett's professional training and code of ethics as a Licensed Social Worker. She does, in fact, so use those principles, methods, and procedures for those purposes.

53. Plaintiffs do not engage in conduct not consistent with their professional training and code of ethics.

54. Nonetheless, defendants claim that plaintiffs' practice is the unlicensed practice of psychology in violation of Louisiana law.

55. Further, Louisiana law prohibits Alleman and Catrett from describing their work as “psychological,” even though it is. La. R.S. § 37-2365.

56. In fact, though, their work *is* psychological and a description of it as psychological is accurate.

57. Given that the word “psychological” accurately describes their work, its use is neither inherently nor actually misleading.

C. The Board’s Investigation Of Plaintiffs

58. Prior to 2024, P. Wellness Institute was known as Psychological Wellness Institute, LLC.

59. Sometime in March 2023, the Board received a complaint concerning Plaintiffs from a licensed psychologist.

60. Over nine months later, in January 2024, acting on that complaint, a representative of the Board apprised Alleman and Catrett that a complaint had been filed alleging that they were in violation of Louisiana law by “illegally representing themselves to the public as licensed psychologists.” The representative further stated that a preliminary investigation had substantiated the allegations of the complaint by confirming multiple violations of Louisiana law. Exhibit 1 is a copy of this letter.

61. Among other things, the letter stated that the Board was “the regulatory authority charged with governing the practice of psychology in this state,” that it “is mandated by law to take legal action against persons who engage in the unlicensed practice of psychology” and that the failure of plaintiffs to take corrective action “will result in the [Board] both filing for civil injunctive relief and making criminal referrals to the appropriate law enforcement agencies.” *See* Ex. 1.

62. The Board considered that plaintiffs' use of the word "Psychological" in the name of their business rendered their practice the unlicensed practice of psychology.

63. The Board's representative also told Alleman and Catrett that the law prohibited them from using "Psy. Wellness Institute" for a name, despite the fact Alleman and Catrett are both licensed to conduct psychotherapy and use it in their practice. This is reflected in Exhibit 2 to this amended complaint, an email dated January 31, 2024.

64. To comply with the Board's understanding of Louisiana law, Alleman and Catrett changed the name of their company to P. Wellness Institute.

65. The Board subsequently dismissed the complaint against Alleman and Catrett.

D. Most Uses, Including Plaintiffs', Of The Words Prohibited by Section 37:2360(A)(1) Are Not Misleading

66. Merriam-Webster's online dictionary gives the following three definitions for "psychological": "of or relating to psychology," "of, relating to, or occurring in the mind," and "directed toward, influencing, or acting on the mind especially in relation to an individual's willpower or behavioral motivation." <https://www.merriam-webster.com/dictionary/psychological>.

67. The same dictionary gives the following definitions for "psychology": the science of mind and behavior," "the mental or behavioral characteristics of an individual or group," "the study of mind and behavior in relation to a particular field of knowledge or activity," and "a theory or system of psychology." <https://www.merriam-webster.com/dictionary/psychology>.

68. As these definitions demonstrate, the words "psychological" and "psychology" can be used in titles and descriptions of services by those not licensed as psychologists by the Board in non-misleading ways because they relate to the general topic of psychology, or generally things relating to the mind, and not the specific practices of psychologists licensed by the Board.

69. In addition to plaintiffs’ previous (and desired future) use of the word “psychological” in the title of their company, it is easy to arrive at numerous other examples of non-misleading uses of “psychological,” “psychology,” or “psychologist.” People who tutor students in psychology courses and call themselves “Psychology Tutors” as a title (or describe their services as “tutoring in psychology”) would not be misleading. People who work for psychology-related publications can describe their services – “I write for *Psychology Today*” – or use a title (“Writer – *Psychology Today*”) without stating anything even remotely misleading. Therapists whose services include references to psychologists can say so and can describe those services in a perfectly true and non-misleading way.

70. Authors and entities that publish books and magazines and/or own bookstores also use “titles” that include the three prohibited words. Calling a magazine *Psychology Today*, using a book title like *Sports Psychology*, or naming a section of a bookstore the “Psychology” section is not misleading and constitutes core speech protected by the First Amendment. Defendants lack any compelling governmental interest adequate to justify restrictions on that speech.

71. Louisiana law also prohibits Alleman and Catrett from using the three prohibited words in a description of their services to others who are not clients and with whom they have no commercial or transactional relationship, such as colleagues or media, or at conventions or training sessions.

72. Like the term “engineer,” “[t]he term [‘psychological’] can mean many things in different contexts, and it is certainly not limited to those professionals licensed by [Louisiana] to practice [psychology].” *Express Oil Change, L.L.C. v. Mississippi Bd. Of Licensure for Professional Engineers & Surveyors*, 916 F.3d 483, 489 (5th Cir. 2019).

73. Accordingly, the prohibition of the three prohibited words in titles or descriptions of services by individuals not licensed as psychologists by the Board is not aimed at, and does not prohibit, inherently or actually misleading speech.

74. Similarly, Louisiana's prohibition on words *in any context* – both commercial and non-commercial – that may imply an expert qualification in any area of psychology prohibits much truthful speech, including that of plaintiffs. This law prohibits people, including plaintiffs, from discussing their expert qualifications in areas of psychology in seminars, conferences, panels, and papers.

75. If the goal of the law were consumer protection, the prohibition on the use of terms that imply an expert qualification in any area of psychology would be entirely gratuitous. The statute already prohibits the use of terms that would imply that a person is a licensed psychologist.

76. Plaintiffs have expert qualifications in areas of psychology because they have studied psychology, and have used the various psychological methods, described in this amended complaint. Those areas of expertise include the treatment of trauma, the use of methods like EMDR and Brainspotting, and treatment of clients using psychotherapy.

77. Plaintiffs have refrained from discussing their expert qualifications because of Louisiana law.

78. Other individuals who may have expert qualifications in areas of psychology, but are not licensed psychologists, include those with advanced degrees in psychology, those who have studied psychology or other psychologists, and those who have been trained in specific areas of psychology, like sports psychology. Precluding those individuals from accurately describing their areas of expertise precludes truthful speech that is neither inherently nor actually misleading.

E. Louisiana Law Is Not Narrowly-Tailored To A Compelling Governmental Interest, And Does Not Directly Advance Any Substantial Interest

79. Louisiana’s licensing scheme for psychologists prohibits substantial amounts of non-commercial speech, including plaintiffs’. Louisiana has no compelling interest to justify these speech-chilling regulations.

80. Even to the extent that it regulates commercial speech, Louisiana’s licensing scheme in general, and Section 37:2360 in particular, does not directly advance any interest in truthful information or protection of consumers.

81. Louisiana law permits others who are not licensed psychologists to use the three prohibited words in titles and to call themselves psychologists. For example, Louisiana licenses individuals as “psychological associates.” They are not licensed psychologists, and these individuals have *less* capacity to use psychological principles, methods, and procedures in treating clients than plaintiffs do. For example, a psychological associate may not provide “[d]iagnoses of severe mental illness, major disorders, or mental disorders as defined by the board.” La. R.S. § 37:2356.4(E)(2)(b). Plaintiffs are licensed to do so and, in fact, make such diagnoses.

82. Nonetheless, “psychological associates” use the word “psychological” in their title, and nothing in Section 37:2360 prohibits them from calling themselves psychologists or engaging in the practice of psychology.

83. Similarly, Louisiana licenses individuals as “specialists in school psychology.” Similar to “psychological associates,” they are not licensed psychologists. Further, like “psychological associates,” but unlike plaintiffs, “specialists in school psychology” are prohibited from diagnosing “mental disorders as defined by the Diagnostic and Statistical Manual of Mental Disorders or diseases as defined by the International Classification of Diseases.” La. R.S.

§ 37:2352(6).

84. Nonetheless, “specialists in school psychology” use the word “psychology” in their title, and nothing in the Section 37:2360 prohibits them from calling themselves psychologists or engaging in the practice of psychology.

85. In addition, the State Board of Elementary and Secondary Education prescribes the qualifications for “school psychologists.” La. R.S. § 17:8.6. Those certified as a Level A school psychologist prior to September 1, 1986, may use the title “certified school psychologist” in the context of their employment. Although these individuals can use the term “psychologist” in their title, they cannot render psychological services outside of their institutional employment.

86. University or college faculty holding an earned doctoral degree in psychology from a regionally accredited institution of higher education, but who are not licensed psychologists, may nonetheless use the title “psychologist” in conjunction with their academic or research activities. La. R.S. § 37:2365(E). However, Sections 37:2360(A)(1) and 37:2352(9) prohibit them from using the words “psychology” or “psychological” in any title or description of services, even if they are Professors of Psychology at the universities or colleges that employ them and/or engage in psychological research.

87. Louisiana’s prohibition on speech does not directly advance the interest of protecting consumers because that is not its purpose. Its purpose is to protect licensed psychologists from competition from other professionals.

F. Section 37:2360 Is Overbroad And Not Narrowly Tailored

88. Section 37:2360(A)(1) is not narrowly-tailored because it prohibits large amounts of truthful speech, both commercial and non-commercial. As already noted, Plaintiffs are prohibited

from using the word “psychological” in the title of their business despite the fact that their work is psychological and meets the definition of “practice of psychology” under Louisiana law.

89. Defendants contend that Section 37:2360 also prohibits plaintiffs from using speech that incorporates their knowledge of psychology and psychological principles, methods, and procedures with their clients because it constitutes the unlicensed practice of psychology.

90. Indeed, under the overbroad definition of the practice of psychology in La. R.S. § 37:2352(7), anyone who has studied psychological principles, methods, and procedures, and attempts to use them to improve someone else’s life has engaged in the practice of psychology and represented himself or herself as a licensed psychologist and has violated Section 37:2360(A)(1) and (A)(2).

91. Under the overbroad definition of the practice of psychology in La. R.S. § 37:2352(7), “life coaches” who have studied psychological principles, methods, and procedures, and attempt to use them to help clients, are engaging in the practice of psychology and thus representing themselves as licensed psychologists and have violated Section 37:2360(A)(1) and (A)(2).

92. Under the overbroad definition of the practice of psychology in La. R.S. § 37:2352(7), Alcoholics Anonymous members who have studied psychological principles, methods, and procedures, and attempt to use them to help others are engaging in the practice of psychology and thus representing themselves as licensed psychologists and have violated Section 37:2360(A)(1) and (A)(2).

93. Under the overbroad definition of the practice of psychology in La. R.S. § 37:2352(7), parents who have studied psychological principles, methods, and procedures, and

attempt to use them to help their children are engaging in the practice of psychology and thus representing themselves as licensed psychologists and have violated Section 37:2360(A)(1) and (A)(2).

94. Under Louisiana law, persons who tutor high school or college students in psychology courses and describe what they do with the words “psychology,” “psychologist,” or “psychological” are representing themselves as licensed psychologists and have violated Section 37:2360(A)(1) and (A)(2).

95. Under the overbroad definition of the practice of psychology in La. R.S. § 37:2352(7), the sports coach who has studied sports psychology and uses its principles, or who uses the word “psychology” in describing how (s)he motivates players, are engaging in the practice of psychology and thus representing themselves as licensed psychologists, and have violated Section 37:2360(A)(1) and (A)(2).

96. Indeed, anyone who has studied psychological principles, methods, and procedures, and attempts to use them to help a friend or relative, or gives a lecture to an audience with the hope of improving their lives, has engaged in the practice of psychology and represented themselves as licensed psychologists.

97. Each of the persons described in paragraphs 90-96 has a First Amendment right to speak. Provided that such individuals do not misrepresent themselves as licensed psychologists, Louisiana has no valid interest in preventing them from speaking.

98. Louisiana law’s effective prohibition on using any phrases that imply expert qualifications in any area of psychology sweeps in a great deal of true and accurate speech protected by the First Amendment. Many people who are not licensed by the Board as psychologists

nonetheless possess expert qualifications in areas of psychology. Plaintiffs themselves possess such expert qualifications in their knowledge of psychological treatment of trauma sufferers.

99. Others not licensed by the Board as psychologists have expert qualifications in areas of psychology, including the theories of Freud and Jung, the subconscious, personality development, and a host of other areas.

100. Even if it were limited only to using the prohibited words “psychology,” “psychologist,” and “psychological” in a title, Section 37:2360(A)(1) would not be narrowly tailored. As described above, many titles that use those words – Psychology Tutor, *Psychology Today*, Psychology Researcher, bookstore sections called Psychology – are not at all misleading if used by persons not licensed as psychologists by the Board.

101. A substantial number of applications of Louisiana’s restriction on free speech in Section 37:2360(A)(1) and (A)(2) are unconstitutional and outweigh its limited legitimate sweep.

102. The failure to define “psychological principles, methods, and procedures” in Section 37:2352(7) also renders Section 37:2360(A)(1) and (A)(2) vague and overbroad.

G. Plaintiffs’ Ongoing Harm

103. Given that they observe and evaluate their clients’ behavior by the application of psychological principles, methods, and procedures, for the purpose of aiding those clients to eliminate undesired behavior and of improving interpersonal relationships, Alleman and Catrett are reasonably concerned that defendants will charge them with the practice of psychology in violation of Louisiana law.

104. Alleman and Catrett would like to change the name of their company back to Psychological Wellness Institute because the word “psychological” accurately describes the services

they provide.

105. As a consequence of Louisiana law, Alleman and Catrett try to avoid using terms “psychological,” “psychology,” and “psychologist” in describing any of their services to clients, potential clients, colleagues, other therapists, and others.

106. Alleman and Catrett would like to use those prohibited words when they describe their services to clients, colleagues, other therapists, psychologists, and others. For example, they would like to explain that they share mutual clients with psychologists, and, as part of their services, will refer clients to psychologists when necessary. These First Amendment-protected communications are currently prohibited by Louisiana law.

107. Defendants lack any reasonable basis for believing that Alleman and Catrett’s use of the prohibited words in the title of their company or in a description of the services they provide would mislead any potential or actual consumers or clients.

108. Defendants have received few, if any, complaints from members of the public or clients of non-psychologist therapists concerning individuals who use the prohibited words in a title or description of services. Instead, complaints about the use of those terms come largely from licensed psychologists concerned that they will lose business to other therapists.**

109. Because the word “psychological” accurately describes the services they provide (as well as the services of many other therapists), it cannot be inherently misleading to use it in a title or description of services.

** Pursuant to Fed. R. Civ. P. 11(b)(3), plaintiffs identify the allegations in this paragraph as ones that will likely have evidentiary support after a reasonable opportunity for further investigation or discovery. Plaintiffs note that defendants refused to respond to plaintiffs’ initial discovery requests, served in January 2025.

110. Because plaintiffs can use the word “psychologist” in phrases that accurately describe the services they provide – *e.g.*, “I am going to provide you with a list of psychologists who can administer testing” – it cannot be inherently misleading to use that word in a description of services.

111. Many phrases that use the word “psychology” – *e.g.*, Psychology Tutor, for a person who tutors students in psychology – accurately describe the services people provide, and, accordingly, use of those phrases in a title or description of services cannot be inherently misleading.

112. Alleman and Catrett sometimes use terms that reflect accurately their expert qualifications in certain areas of psychology, including the diagnosis and treatment of trauma-induced conditions, in general communications, and in speaking with clients, colleagues, and other groups of therapists. Because Louisiana law prohibits this, they are concerned that defendants will take adverse action against them for doing so. They will use such terms more freely, and without such concern, if defendants are enjoined from taking adverse action against them.

113. Defendants lack any reasonable basis for believing that Alleman and Catrett’s use of terms accurately reflecting their expert qualifications in an area of psychology would mislead any potential or actual consumers or clients. In fact, discovery will show that the Board has received few, if any, complaints regarding individuals who use terms that reflect their expert qualifications in any area of psychology.

114. Unless the Board Defendants are enjoined, they will charge Alleman and Catrett with violations of Louisiana law if Alleman and Catrett change the name of their company back to Psychological Wellness Institute, use the terms “psychologist,” “psychological,” or “psychology” in accurately describing their services to their clients or others, use terms in any context that imply expert qualification in an area of psychology, or continue to use psychological principles as they

have in the past in their practice.

115. Unless the Board Defendants are enjoined, they will refer Alleman and Catrett's alleged violations of Louisiana law to defendant EBRP DA if Alleman and Catrett change the name of their company back to Psychological Wellness Institute, use the terms "psychologist," "psychological," or "psychology" in accurately describing their services to their clients or others, use terms in any context that imply expert qualification in an area of psychology, or continue to use psychological principles as they have in the past in their practice.

116. Unless the official holding that position is enjoined, defendant EBRP DA will charge Alleman and Catrett with a misdemeanor under Louisiana law if they change the name of their company back to Psychological Wellness Institute, use the terms "psychologist," "psychological," or "psychology" in accurately describing their services to their clients or others, use terms in any context that imply expert qualification in an area of psychology, or continue to use psychological principles as they have in the past in their practice.

FIRST CLAIM FOR RELIEF (As applied challenge to Section 37:2360(A)(2))

117. Plaintiffs incorporate all prior allegations of this Complaint into this claim.

118. As interpreted by defendants, Section 37:2360(A)(2) precludes plaintiffs from using psychological principles and methods consistent with their professional training and code of ethics in speaking with their clients.

119. Section 37:2360(A)(2) violates plaintiffs' rights under the First Amendment. Louisiana has no compelling interest in precluding plaintiffs, in speaking with their clients, from utilizing psychological principles and methods they have learned in their professional training, regarding how the clients might improve their lives.

SECOND CLAIM FOR RELIEF (First Amendment overbreadth for Section 37:2360(A)(2))

120. Plaintiffs incorporate all prior allegations of this Complaint into this claim.

121. Sections 37:2360(A)(2), Louisiana’s law prohibiting people from engaging in the practice of psychology is overbroad and unconstitutional in violation of the First Amendment.

THIRD CLAIM FOR RELIEF (As applied challenge to Section 37:2360(A)(1))

122. Plaintiffs incorporate all prior allegations of this Complaint into this claim.

123. Section 37:2360(A)(1) precludes speech that is neither inherently nor potentially misleading.

124. To the extent that Section 37:2360(A)(1) prohibits the use of commercial speech, it does not directly advance a substantial governmental interest, including consumer protection.

125. Assuming *arguendo* that 37:2360(A)(1) did directly advance a substantial governmental interest, it is not narrowly-tailored. Any interest in consumer protection could be met by requiring additional disclosures.

126. Section 37:2360(A)(1) also prohibits much non-commercial speech, including speech that uses the words “psychology,” “psychological,” or “psychologist” in a description of services to anyone, and any speech that implies that plaintiffs have expert qualifications in an area of psychology (which they do).

127. To the extent that Sections 37:2360(A)(1) precludes plaintiffs from accurately using the word “psychological” in the name of their company, accurately describing their services, using terms that imply their expert qualification in areas of psychology, or using principles of psychology consistent with their professional training in speaking with their clients, it violates their free speech rights under the First Amendment to the United State Constitution incorporated into the Fourteenth

Amendment of the United States Constitution.

128. Plaintiffs are entitled to an appropriate declaration or injunction against defendants.

FOURTH CLAIM FOR RELIEF (First Amendment overbreadth for Section 37:2360(A)(1))

129. Plaintiffs incorporate all prior allegations of this Complaint into this claim.

130. Sections 37:2360(A)(1), Louisiana's law prohibiting people from representing themselves as psychologists is overbroad and unconstitutional in violation of the First Amendment.

Demand For Judgment

WHEREFORE plaintiffs demand judgment:

A. A declaratory judgment that defendants are violating plaintiffs' First and Fourteenth Amendments rights by enforcing or threatening to enforce Sections 37:2360(A)(1) and 37:2360(A)(2);

B. A declaratory judgment that Sections 37:2360(A)(1) and (A)(2) are overbroad and facially invalid under the First and Fourteenth Amendments;

C. Injunctive relief precluding defendants from commencing any action against plaintiffs to enforce any purported prohibitions of Sections 37:2360(A)(1) and 37:2360(A)(2);

D. Injunctive relief precluding defendants from taking any action against plaintiffs for changing the name of their company back to Psychological Wellness Institute, using the terms "psychologist," "psychological," or "psychology" in accurately describing their services to their clients or others, using terms in any context that imply their true expert qualifications in an area of psychology, or engaging in speech with their clients that use their knowledge and experience with psychology and is consistent with their professional training and codes of ethics;

E. Attorney's fees and costs pursuant to 28 U.S.C. § 1920 and 42 U.S.C. § 1988, or any

other applicable authority; and

F. Any other relief that is appropriate.

Dated: May 23, 2025

s/ Michael E. Rosman

Michael E. Rosman (admitted pro hac vice)
Michelle Scott (admitted pro hac vice)
CENTER FOR INDIVIDUAL RIGHTS
1100 Connecticut Ave, NW, Ste. 625
Washington, D.C. 20036
(202) 833-8400
rosman@cir-usa.org

s/ Sarah Harbison

Sarah Harbison
LSBA #31948
James Baehr
LSBA #35431
Pelican Institute for Public Policy
400 Polydras St., Suite 900
New Orleans, LA 70130
504-500-0506
james@pelicaninstitute.org
sarah@pelicaninstitute.org

Lauren Ventrella
LSBA #36063
VENTRELLA LAW FIRM
22650 Greenwell Springs
Greenwell Springs, LA 70739
225-304-3636
leventrella@gmail.com

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

-----X
JULIE ALLEMAN, JULIET CATRETT, and P. :
WELLNESS INSTITUTE, LLC :

Plaintiffs,

v.

SHANNAE N. HARNESS, *et al.*

Defendants.

-----X

Case. No. 3:24-cv-00877

Judge John deGravelles

Magistrate Judge Scott D. Johnson

EXHIBIT LIST FOR PLAINTIFFS' AMENDED COMPLAINT

<u>Exhibit</u>	<u>Description</u>
Ex. 1	Letter dated 1/3/2024 from Jonathon Wagner to Juliet Catrett
Ex. 2	Email dated 1/31/2024 from Jonathon Wagner to Juliet Catrett and Julie Alleman

Dated: May 23, 2025

s/ Michael E. Rosman

Michael E. Rosman (admitted pro hac vice)

Michelle Scott (admitted pro hac vice)

CENTER FOR INDIVIDUAL RIGHTS

1100 Connecticut Ave, NW, Ste. 625

Washington, D.C. 20036

(202) 833-8400

rosman@cir-usa.org

s/ Sarah Harbison

Sarah Harbison

LSBA #31948

James Baehr

LSBA #35431

Pelican Institute for Public Policy

400 Polydras St., Suite 900

New Orleans, LA 70130

504-500-0506

james@pelicaninstitute.org

sarah@pelicaninstitute.org

Lauren Ventrella

LSBA #36063

VENTRELLA LAW FIRM

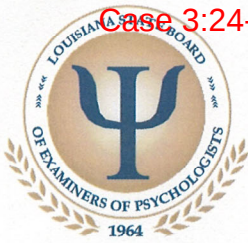
22650 Greenwell Springs

Greenwell Springs, LA 70739

225-304-3636

leventrella@gmail.com

**EXHIBIT 1:
LETTER
DATED JAN. 3,
2024 FROM J.
WAGNER TO J.
CATRETT**



Case 3:24-cv-00877-JWD-SDJ Document 50-2 05/23/25 Page 2 of 6

**LOUISIANA STATE BOARD
OF EXAMINERS OF
PSYCHOLOGISTS**

4334 South Sherwood Forest Boulevard, #C-150
Baton Rouge, Louisiana 70816

Voice: (225) 295-8410
Fax: (225) 295-8412
Email: admin.lsbep@la.gov
Website: lsbep.org

USPS Certified #7020 2450 0001 9081 4539

January 3, 2024

Psychological Wellness Institute, LLC
ATTN: Juliet Catrett
4451 Bluebonnet Blvd., Ste. G
Baton Rouge, LA 70809

RE: NP22-23-13P

Ms. Catrett,

The Louisiana State Board of Examiners of Psychologists ("LSBEP") has received a complaint alleging that both the Psychological Wellness Institute, LLC, and its members, in their individual capacities, are illegally representing themselves to the public as licensed psychologists. A preliminary investigation of this complaint has substantiated the allegations by confirming multiple violations of La. R.S. 37:2352(9).

As the regulatory authority charged with governing the practice of psychology in this state, the LSBEP is mandated by law to take legal action against persons who engage in the unlicensed practice of psychology. In an attempt to prevent the escalation of this matter, the LSBEP is sending you this notice to inform you of the laws applicable to your situation in the hopes that you will take voluntary corrective action within the next thirty days. Failure to do so will result in the LSBEP both filing for civil injunctive relief and making criminal referrals to the appropriate law enforcement agencies.

Thank you in advance for your assistance with this matter. Please do not hesitate to contact me if you have any questions (225) 295-8410.

Sincerely,

Jonathon Wagner
Executive Counsel, LSBEP

Enclosures: La. R.S. 37:2352
La. R.S. 37:2360
La. R.S. 37:2361
Secretary of State Business Filing

La. R.S. 44:33.1 - In compliance with La. R.S. 44:33.1, the LSBEP hereby gives notice that information submitted to the LSBEP may become public record pursuant to the provisions of Louisiana Public Records Law, La. R.S. 44:1, *et seq.*

Michelle B. Moore, Psy.D.
Chairperson

Shannae Harness, Ph.D.
Vice Chairperson

D. Chance McNeely
Member

T. Shavaun Sam, Ph.D.
Member

Matthew J. Holcomb, Ph.D.
Member

Shawanda Woods-Smith, Psy.D.
Member

Jaime T. Monic
Executive Director

§2352. Definition of terms

As used in this Chapter the following terms mean:

- (1) "Applicant" means any person who has submitted an application form to the board, paid the application fee, and who has provided such additional information as the board may require.
- (2) "Board" means the Louisiana State Board of Examiners of Psychologists.
- (3) "Candidate" means any person whose application and related materials have been approved by the board. Only candidates are eligible to take the written/oral examination.
- (4) "Licensed specialist in school psychology" means any person licensed as a specialist in school psychology who applies his knowledge of both psychology and education during consultation and collaboration with others and engages in specific services for students, such as direct and indirect interventions that focus on academic skills, learning, socialization, and mental health.
- (5) "Persons" includes an individual, firm, partnership, association, or corporation.
- (6) "Practice of licensed specialist in school psychology" is defined as the application of psychological principles, methods, and procedures to help children and youth succeed academically, socially, behaviorally, and emotionally. Licensed specialists in school psychology collaborate with educators, parents, and other professionals to create safe, healthy, and supportive learning environments that strengthen the connection between home, school, and the community for all students. They apply their knowledge of both psychology and education during consultation and collaboration with others and conduct effective decision making using a foundation of assessment and data collection. Licensed specialists in school psychology provide services to schools and families that enhance the competence and well-being of children, including promotion of effective and safe learning environments, prevention of academic and behavior problems, response to crises, and improvement of the collaboration between schools and families. The key foundations for all services provided by licensed specialists in school psychology are understanding of diversity in development and learning, research and program evaluation, and legal, ethical, and professional practices. The types of evaluations performed by a licensed specialist in school psychology will be those that are germane to the current state educational bulletins, including but not limited to Louisiana Bulletins 1508 and 1706. Nothing in this Chapter shall be construed to permit a licensed specialist in school psychology to diagnose mental disorders as defined by the Diagnostic and Statistical Manual of Mental Disorders or diseases as defined by the International Classification of Diseases.
- (7) "Practice of psychology" is defined as the observation, description, evaluation, interpretation, and modification of human behavior, by the application of psychological principles, methods, and procedures, for the purpose of eliminating symptomatic, maladaptive, or undesired behavior, and of improving interpersonal relationships, work and life adjustment, personal effectiveness, behavioral health, and mental health. The practice of psychology includes but is not limited to psychological testing and evaluation or assessment of personal characteristics such as intelligence, personality, abilities, interests, aptitudes, and neuropsychological functioning; counseling, psychoanalysis, psychotherapy, hypnosis, stress management, biofeedback, behavior analysis and therapy; diagnosis and treatment of mental and emotional disorder or disability, alcoholism and substance abuse, and of the psychological aspects of physical illness, accident, injury, or disability; psycho educational evaluation, therapy, remediation, and consultation. Psychological services may be rendered to individuals, families, groups, institutions, organizations, and the public. The practice of psychology shall be construed within the meaning of this definition without regard to whether payment is received for services rendered.
- (8) "Provisional licensed psychologist" means a person provisionally licensed under this Chapter.
- (9) "Psychologist" means any person licensed as a psychologist under this Chapter. A person represents himself to be a psychologist by using any title or description of services incorporating the words "psychology", "psychological", or "psychologist", or by using any other terms which imply that he is qualified to practice psychology or that he possesses expert qualification in any area of psychology or if that person offers to the public or renders to individuals or to groups of individuals services defined as the practice of psychology in this Chapter.

§2360. Violation and penalties

A. It shall be a misdemeanor:

(1) For any person not licensed under this Chapter or Part VI of Chapter 15 of this Title to represent himself as a psychologist; or

(2) For any person not licensed under this Chapter or Part VI of Chapter 15 of this Title to engage in the practice of psychology; or

(3) Except for medical psychologists duly licensed by the Louisiana State Board of Medical Examiners, for any person to represent himself as a psychologist during the time that his license as a psychologist shall be suspended or revoked or lapsed; or

(4) For any person to otherwise violate the provisions of this Chapter.

B. Such misdemeanor shall be prosecuted by the district attorney of the judicial district in which the offense was committed in the name of the people of the state of Louisiana.

C. Such misdemeanor shall be punishable upon conviction by imprisonment for not more than six months, or by a fine of not less than one hundred dollars nor more than five hundred dollars, or by both such fine and imprisonment. Each violation shall be deemed a separate offense.

Added by Acts 1964, No. 347, §10. Amended by Acts 1980, No. 415, §1; Acts 1985, No. 719, §1; Acts 1987, No. 915, §2, eff. Sept. 1, 1987; Acts 2009, No. 251, §8, eff. Jan. 1, 2010; Acts 2021, No. 238, §2.

NOTE: See Acts 1987, No. 915, §3.

§2361. Injunctive proceedings

A. The board may investigate any evidence or allegation which appears to show that any person is or may be in violation of any provision of this Chapter.

B. The board may apply for an injunction in any court of competent jurisdiction to enjoin any person from committing any act which is in violation of this Chapter.

C. If it be established that the defendant has been or is committing an act which is in violation of this Chapter, the court shall enter a decree perpetually enjoining said defendant from further committing such act.

D. In case of violation of any injunction issued under the provisions of this Section, the court may summarily try and punish the offender for contempt of court.

E. Such injunctive proceedings shall be in addition to, and not in lieu of, all penalties and other remedies as provided in this Chapter.

Added by Acts 1964, No. 347, §11; Acts 1987, No. 915, §2, eff. Sept. 1, 1987.

{{NOTE: SEE ACTS 1987, NO. 915, §3.}}



(https://www.sos.la.gov/Pages/default.aspx)

Search for Louisiana Business Filings

[Buy Certificates and Certified Copies](#)[Subscribe to Electronic Notification](#)[Print Detailed Record](#)

Name	Type	City	Status
PSYCHOLOGICAL WELLNESS INSTITUTE, LLC	Limited Liability Company	BATON ROUGE	Active

Previous Names

Business: PSYCHOLOGICAL WELLNESS INSTITUTE, LLC

Charter Number: 44085612K

Registration Date: 9/24/2020

Domicile Address

4451 BLUEBONNET BOULEVARD
SUITE G
BATON ROUGE, LA 708091430

Mailing Address

4451 BLUEBONNET BOULEVARD
SUITE G
BATON ROUGE, LA 708091430

Status

Status: Active

Annual Report Status: In Good Standing

File Date: 9/24/2020

Last Report Filed: 9/5/2023

Type: Limited Liability Company

Registered Agent(s)

Agent: JULIET CATRETT
Address 1: 4451 BLUEBONNET BOULEVARD
Address 2: SUITE G
City, State, Zip: BATON ROUGE, LA 708091430
Appointment Date: 9/24/2020

Officer(s)

Additional Officers: No

Officer: JULIE ALLEMAN RIOS
Title: Member
Address 1: 13196 WEST WATERSIDE DRIVE
City, State, Zip: BATON ROUGE, LA 708185853

Officer: JULIET CATRETT
Title: Member
Address 1: 7133 SEVENOAKS AVE
City, State, Zip: BATON ROUGE, LA 708067437

Amendments on File

No Amendments on file

[Back to Search Results](#)[New Search](#)[View Shopping Cart](#)

**EXHIBIT 2:
EMAIL DATED
JAN. 31, 2024
FROM J.
WAGNER TO J.
CATRETT AND
J. ALLEMAN**

From: Jonathon Wagner <Jonathon.Wagner@la.gov>
To: "juliet@pwibr.com" <juliet@pwibr.com>
Cc: "julie@pwibr.com" <julie@pwibr.com>
Date: 01/31/2024 8:38 AM CST
Subject: Yesterday's zoom meeting

Good morning,

I wanted to take a moment to document our zoom conversation from yesterday. Please reply if I am mistaken in my understanding.

1. You disagree with the effect that La. R.S. 32:2352 has regarding the name of your business but do understand that the Board must enforce the law as written.
2. You will voluntarily take appropriate measures to comply with the law but ask that the Board grant you the time to make the necessary changes.

3. We discussed that you should be able to achieve substantial compliance within 90 days from today.

While we did not discuss specifics, I would consider substantial compliance to include altering your website, submitting name change paperwork to the Secretary of State, and ordering a new sign to replace the one on Bluebonnet. Full compliance should come at a reasonable time thereafter.

4. We discussed you possibly changing "Psychological" to just "Psy." I have given this a bit more thought and decided that would likely not suffice as it would just be an abbreviation of a prohibited term and fall under the "any other" language of 2352.

5. I told you I would suggest "P" words that might suffice to help you preserve your e-mail addresses. My suggestions are as follows:

- Pacific
- Pathfinding
- Personalized
- Pinnacle
- Precision
- Preferred
- Professional

Sincerely,

Jonathon Wagner



Louisiana State Board of Examiners of Psychologist

Jonathon Wagner, Executive Counsel

JWagner@la.gov – Ph.# (225) 295-8410 – Fax# (225) 295-8412

4334 S. Sherwood Forest Blvd., Ste. C-150, Baton Rouge, LA. 70816

NOTICE: La. R.S. 44:33.1 - In compliance with La. R.S. 44:33.1, the LSBEP hereby gives notice that information submitted to the LSBEP may become public record pursuant to the provisions of Louisiana Public Records Law, La. R.S. 44:1, *et seq.*

The information contained in this transmission may contain privileged and confidential information. It is intended only for the use of the person(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message. To reply to our e-mail administrator directly, please send an e-mail to jaimemonic@la.gov