

SETTLEMENT AGREEMENT BETWEEN
THE STATE COMMITTEE OF PSYCHOLOGISTS
AND KEITH NOBLE, Ph.D.

Keith Noble, Ph.D. ("Licensee") and the State Committee of Psychologists ("Committee") enter into this Settlement Agreement for the purpose of resolving the question of the appropriate level of discipline of Licensee's license as a psychologist (License No. 00831).

The Committee and Licensee jointly stipulate and agree that a final disposition of this matter may be effectuated as described below.

Licensee acknowledges that Licensee understands the various rights and privileges afforded Licensee by law regarding the appropriate level of discipline on Licensee's license, including the right to a disciplinary hearing before the Committee at which time Licensee may present evidence in mitigation of discipline; the right to a claim for attorney's fees and expenses; and the right to obtain judicial review of the decisions of the Administrative Hearing Commission and the Committee.

Being aware of these rights provided to Licensee by law, Licensee knowingly and voluntarily waives each and every one of these rights and freely enters into this Settlement Agreement and agrees to abide by the terms of this document as they pertain to Licensee.

For the purpose of settling this dispute, Licensee stipulates that the factual allegations contained in this settlement agreement are true and stipulates with the Committee that Licensee's license, numbered 00831 is subject to disciplinary action by the Committee in accordance with the provisions of Chapter 621, and Sections 337.010 through 337.345, RSMo.

Part I.

Joint Stipulation of Facts and Conclusions of Law

Based upon the foregoing, the Committee and Licensee herein jointly stipulate to the following:

1. The Committee is an agency of the State of Missouri created and established pursuant to Chapter 337, RSMo, for the purpose of carrying out the provisions of Chapter 337, RSMo, relating to psychologists.

2. Licensee is a natural person with a current address of 1037 W. Sycamore Street, Springfield, Missouri 65810. Licensee is licensed by the Committee as a psychologist, License No. 00831.

3. On or about September 12, 2018, the Committee became aware that the United States Attorney's Office for the Western District of Missouri issued a press release indicating Licensee pleaded guilty to one count of concealment of a known felony.

4. On or about September 11, 2018, Licensee voluntarily entered a plea of guilty to a single-count Information charging him with a violation of 18 U.S.C. § 4, *Misprision of Felony*, in the United States District Court For The Western District Of Missouri, Southern Division, case number 18-03097-01-CR-S-MDH. Sentencing is pending.

5. On or about March 24, 2021, the Committee filed a Complaint at the Administrative Hearing Commission seeking authority to discipline Licensee's license based on the plea of guilty in case number 18-03097-01. On or about December 1, 2021, the parties, Licensee, and the Committee, entered into a Joint Stipulation for Cause For Discipline at the Administrative Hearing Commission. The parties stipulated that the factual and legal basis for discipline set forth in the March 24, 2021 Complaint were true and accurate. The parties stipulated that there was cause to

discipline Licensee's license. On or about December 7, 2021, the Administrative Hearing Commission entered its Consent Order finding cause to discipline Licensee's license based on the Complaint and Joint Stipulation.

6. Regulation 20 CSR 2235-5.030, regarding ethical rules of conduct, state in relevant part:

(1) General Principles.

(A) Purpose. The ethical rules of conduct constitute the standards against which the required professional conduct of a psychologist is measured.

(B) Scope. The psychologist shall be governed by these ethical rules of conduct Whenever providing psychological services in any context. These ethical rules of conduct shall apply to the conduct of all licensees and applicants, including the applicant's conduct during the period of education, training and employment which is required for licensure. The term psychologist, as used within these ethical rules of conduct, shall be interpreted accordingly whenever psychological services are being provided in any context.

(C) Responsibility for Own Actions. The psychologist, when functioning as a licensed psychologist, shall be fully responsible for his/her own professional decisions and professional actions.

(D) Violations. A violation of these ethical rules of conduct constitutes unprofessional conduct and is sufficient reason for disciplinary action or denial of either original licensure, reinstatement, or renewal of licensure.

(13) Violations of Law.

(A) Violations of Applicable Statutes. The psychologist shall not violate any applicable statute or administrative rule regarding the practice of psychology.

(B) Use of Fraud, Misrepresentation or Deception. The psychologist shall not use fraud, misrepresentation, or deception in:

...

7. Conducting any other activity related to the practice of psychology.

7. As a result of the Joint Stipulation and Consent order, identified in paragraph 5 above, as well as Licensee's underlying conduct, cause exists for the Committee to discipline Licensee's psychology license under § 337.035.2(2), (5), (6), (13) and (15), RSMo.

8. Cause exists for the Committee to take disciplinary action against Licensee's license under § 337.035, RSMo, which states in pertinent part:

2. The Committee may cause a complaint to be filed with the administrative hearing commission as provided by chapter 621, RSMo, against any holder of any certificate of registration or authority, permit or license required by this chapter or any person who has failed to renew or has surrendered the person's certificate of registration or authority, permit or license for any one or any combination of the following causes:

...

(2) The person has been finally adjudicated and found guilty, or entered a plea of guilty or nolo contendere, in a criminal prosecution under the laws of any state or of the United States, for any offense reasonably related to the qualifications, functions, or duties of any profession licensed or regulated under this chapter, for any offense an essential element of which is fraud, dishonesty, or an act of violence, or for any offense involving moral turpitude, whether or not sentence is imposed;

...

(5) Incompetency, misconduct, gross negligence, fraud, misrepresentation, or dishonesty in the performance of the functions or duties of any profession licensed or regulated by this chapter;

(6) Violation of, assisting, or enabling any person to violate, any provision of this chapter, or any lawful rule or regulation adopted pursuant to this chapter;

...

(13) Violation of any professional trust or confidence;

...

(15) Being guilty of unethical conduct as defined in “Ethical Rules of Conduct” as adopted by the committee and filed with the secretary of state.

Part III.

Joint Agreed Disciplinary Order

9. Based on the foregoing, the parties mutually agree and stipulate that the following shall constitute the disciplinary order entered by the Committee in this matter under the authority of §§ 536.060, 621.045, and 621.110, RSMo.

10. Licensee’s license to practice psychology, License No. 00831, is hereby **VOLUNTARILY SURRENDERED AS REPORTABLE DISCIPLINE**. Licensee shall return all indicia of licensure to the Committee immediately.

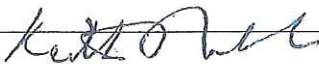
11. The parties to this Agreement understand that the State Committee of Psychologists will maintain this Agreement as an open record of the Committee as provided in Chapters 337, 610 and 324, RSMo.

12. The terms of this settlement agreement are contractual, legally enforceable, and binding, not merely recital. Except as otherwise provided herein, neither this settlement agreement nor any of its provisions may be changed, waived, discharged, or terminated, except by an instrument in writing signed by the party against whom the enforcement of the change, waiver, discharge, or termination is sought.

13. Licensee, together with his heirs and assigns, and his attorneys, do hereby waive, release, acquit and forever discharge the Committee, its respective members and any of its employees, agents, or attorneys, including any former Committee members, employees, agents, and attorneys, of, or from, any liability, claim, actions, causes of action, fees, costs and expenses, and compensation, including but not limited to, any claims for attorney’s fees and expenses,

including any claims pursuant to § 536.087, RSMo, or any claim arising under 42 U.S.C. § 1983, which may be based upon, arise out of, or relate to any of the matters raised in this case, its settlement, or from the negotiation or execution of this settlement agreement. The parties acknowledge that this paragraph is severable from the remaining portions of this settlement agreement in that it survives in perpetuity even in the event that any court of law deems this settlement agreement or any portion thereof to be void or unenforceable.

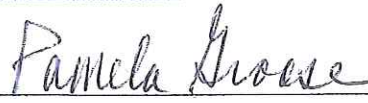
LICENSEE



Keith Noble, Ph.D.

Date 9/14/2022

COMMITTEE



Pamela Groose, Executive Director
State Committee of Psychologists

Date 9-15-2022



STATE OF MISSOURI)
) ss.
COUNTY OF GREENE)

Keith Noble, of lawful age, being duly sworn on his oath, states that he is the Licensee named above; that the facts stated therein are true according to the best knowledge and belief of Licensee.

[Signature]
Subscribed and sworn to before me this 14 day of September, 2022.

Kayla M. Robertson

Notary Public

My Commission Expires:

