

RECEIVED

SEP 4 1979

PRESIDENT'S OFFICE

CERTIFICATE OF MAILING

I CERTIFY THAT I MAILED A COPY OF THE FOREGOING DOCUMENT TO WHICH THIS CERTIFICATE IS ATTACHED, TO THE ATTORNEY OF RECORD OF Respondent DEFENDANT POSTAGE PREPAID ON 3/5 DAY OF August 19 77

W. Howard Fischer  
ATTORNEY FOR PLAINTIFF-DEMANDANT  
Board

BEFORE THE WASHINGTON STATE BOARD OF CHIROPRACTIC EXAMINERS

In the Matter of the Withdrawal of )	
Accreditation and Approval of )	NO. PL 2443
WESTERN STATES CHIROPRACTIC COLLEGE) )	STATEMENT OF CHARGES
)	

COMES NOW the Washington State Board of Chiropractic Examiners, by and through its attorneys, SLADE GORTON, Attorney General, and W. HOWARD FISCHER, Assistant Attorney General, and alleges and states as follows:

- 1.0 The Washington State Board of Chiropractic Examiners is a Board of the State of Washington created pursuant to chapter 18.25 RCW.
- 2.0 The Washington State Board of Chiropractic Examiners (hereinafter referred to as the "Board") is responsible for accrediting and approving chiropractic schools or colleges.
- 3.0 That at all times material hereto Western States Chiropractic College has been a chiropractic school or college accredited and approved by the Board.
- 4.0 First Cause of Action. That Western States Chiropractic College, periodically after June 11, 1977, failed to offer a curriculum consisting of an aggregate total of 4000 actual classroom hours.
  - 4.1 That by reason of the conduct of Western States Chiropractic College, as set forth in the preceding paragraph, the college failed to fulfill the requirements for approval by the Board as contained in RCW 18.25.020(1) and WAC 114-12-040(3).
- 5.0 Second Cause of Action. That Western States Chiropractic College after June 11, 1977, to the present, failed to provide each chiropractic student with instruction in the subjects and for the minimum number of classroom hours specified in WAC 114-12-040(3).
  - 5.1 That by reason of the conduct of Western States Chiropractic College, as set forth in the preceding paragraph, the college fails to fulfill the requirements for approval by the

Board as contained in WAC 114-12-040(3).

6.0 Third Cause of Action. That Western States Chiropractic College, after June 11, 1977, awarded degrees of doctor of chiropractic to students who have not successfully completed a total of 4000 actual classroom hours.

6.1 That by reason of the conduct of Western States Chiropractic College, as set forth in the preceding paragraph, the college fails to fulfill the requirements for approval by the Board as contained in WAC 114-12-040(4).

7.0 Fourth Cause of Action. That the conduct described in the preceding Causes of Action, paragraph 4.0 through 6.1, are realleged and incorporated by reference herein as if fully set forth.

7.1 That the conduct so described constitutes a status which might conceivably make Western States Chiropractic College unworthy of approval by the Board.

7.2 That Western States Chiropractic College failed to notify the Board of the conduct so described and by reason thereof failed to fulfill the requirements for approval by the Board as set forth in WAC 114-12-030(5).

WHEREFORE, since the conduct referred to in this Statement of Charges constitutes grounds for withdrawal of the accreditation and approval of Western States Chiropractic College, the staff of the Washington State Board of Chiropractic Examiners requests that notice be issued to and served upon Western States Chiropractic College giving it the opportunity to defend against the allegations of the Statement of Charges, and provided that if it shall fail to defend against these allegations, that the Board enter an

order withdrawing the accreditation and approval by the Board  
of Western States Chiropractic College.

DATED this 31st day of August, 1979.

SLADE GORTON  
Attorney General

*W Howard Fischer*

W. HOWARD FISCHER  
Assistant Attorney General  
Attorneys for the Washington  
State Board of Chiropractic Examiners