

**IN THE MATTER OF** \* **BEFORE THE STATE BOARD**  
**DONNA WILLIS, P.T.** \* **OF PHYSICAL THERAPY**  
**LICENSE NO. 16560** \* **EXAMINERS**  
\* **CASE NO.: 03-BP-015**

\* \* \* \* \*

**CONSENT ORDER**

**PROCEDURAL BACKGROUND**

Based on the information received and a subsequent investigation by the Maryland State Board of Physical Therapy Examiners ("the Board") and subject to the Maryland Physical Therapy Act, codified at Md. Health Occ. Code Ann. ("H.O.") §13-101 et seq. (2000 Repl. Vol.) ("the Act"), the Board charged Donna Willis, P.T. ("the Respondent"), License Number: 16560, with violating certain provisions of the Act. Specifically, the Board charged the Respondent with violation of the following provisions of § 13-316:

Subject to the hearing provisions of § 13-317 of this subtitle, the Board may deny a license, temporary license, or restricted license to any applicant, reprimand any licensee or holder of a temporary license or restricted license, place any licensee or holder of a temporary license or restricted license on probation, or suspend or revoke a license, temporary license, or restricted license if the applicant, licensee or holder:

- (1) Fraudulently or deceptively obtains or attempts to obtain a license, temporary license, or restricted license for the applicant, licensee, or holder or for another;
- (2) Fraudulently or deceptively uses a license, temporary license, or restricted license;
- (16) Violates any provision of this title or rule or regulation adopted by the Board;

(20) Commits an act of unprofessional conduct in the practice of physical therapy;

Under Md. Code Ann. Health Occ. Art. § 13-401(a) Except as otherwise provided in this title, a person may not practice, attempt to practice or offer to practice physical therapy in this State unless licensed to practice physical therapy by the Board;

Under Health Occ. §13-402(a) Unless licensed to practice physical therapy under this title, a person may not represent to the public by title that the person is licensed to practice physical therapy in this State; and

(b) Unless licensed to practice physical therapy under this title, a person may not use the abbreviation "P.T." or any other word, letter or symbol approved by the board with the intent to represent that the person practices physical therapy.

The specific regulations under the Board Charges are:

**COMAR 10.38.01.05 Restrictions**

B. Practice after the date of expiration of the license is prohibited.

**COMAR 10.38.03.02-1<sup>1</sup> Requirements for Documentation**

A. The physical therapist shall document legibly the patient's chart each time the patient is seen for:

(1) The initial visit, by including the following information:

- (a) Date;
- (b) Condition, or diagnosis, or both for which physical therapy is being rendered,
- (c) Onset;
- (d) History, if not previously recorded;
- (e) Evaluation and results of test (measurable and objective data);
- (f) Interpretation;
- (g) Goals;
- (h) Modalities, or procedures, or both, used during the initial visit and the parameters involved including the areas of the body treated;
- (g) Plan of care including suggested modalities, or procedures, or both, number of visits per week, and number of weeks; and
- (i) Signature, title (P.T.), and license number;

(2) Subsequent visits, by including the following (progress notes):

- (a) Date;

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<sup>1</sup> COMAR 10.38.03.02-1 became effective on March 18, 2002.

- (b) Cancellations, no-shows;
  - (c) Subjective response to treatment;
  - (d) Modalities, or procedures, or both, with any changes in the parameters involved and areas of the body treated;
  - (e) Objective functional status;
  - (f) Response to current treatment;
  - (g) Continuation of or changes in plan of care; and
  - (h) Signature, title (PT), and license number, and the flow chart may be initialed
- (3) Reevaluation, by including the following information in the report, which may be in combination with visit note, if treated during the same visit:
- (a) Date
  - (b) Number of treatments;
  - (c) Reevaluation, tests, and measurements of areas of body treated;
  - (d) Changes from previous objective findings;
  - (e) Interpretation of results;
  - (f) Goals met or not met and reasons;
  - (g) Updated goals;
  - (h) Plan of care including recommendation for follow-up; and
  - (i) Signature, title (PT), and license number
- (4) Discharge, by including the following information in the discharge summary, which may be combined with the final visit note, if seen by the physical therapist on the final visit and written by the physical therapist;
- (a) Date;
  - (b) Reason for Discharge;
  - (c) Objective functional status;
  - (d) Recommendation for follow-up, and
  - (e) Signature, title (PT), and license number.

On September 30, 2003, a Case Resolution Conference ("CRC") was held at the Board's offices to determine whether there existed the possibility of resolving the pending issues without having an evidentiary hearing. The Parties agreed to settlement of the above captioned matter in accordance with the following Findings of Fact, Conclusions of Law and Consent Order.

## **FINDINGS OF FACT**

The Board finds that the following facts are true:

### **I. Background**

1. The Respondent is currently licensed to practice physical therapy in the State of Maryland.
2. The Respondent was first licensed in 1989, being issued license number 16560.
3. On May 31, 2002, the Respondent's license expired.
4. The Respondent's name appeared in the Board's Summer 2002 Newsletter as one of a list of individuals who "did not renew their license this period and cannot practice in the State of Maryland."
5. On July 24, 2002, the Respondent went to the Board's offices and completed an application for the reinstatement of her license.
6. On July 29, 2002 the Board reinstated the Respondent's license.
7. The Respondent's license expires on May 31, 2004.
8. The Respondent worked as a staff physical therapist for Genesis Rehabilitation Services from January 7, 2002 to September 30, 2002.
9. The Respondent primarily provided physical therapy services for Genesis Rehabilitation Services at its Knollwood Manor location in Millersville, Maryland.
10. On or about September 9, 2002, the Respondent's employer called the Board to inquire about the Respondent's current licensure status because Respondent's employer noticed the Respondent's name in the Board's Newsletter as an individual who had not renewed her license.

11. The Board began an investigation as a result of the telephone inquiry from the Respondent's employer.

12. On or about October 2, 2002 the Board received a written complaint from the Respondent's employer that the Respondent had been terminated from employment at Genesis Rehabilitation Services because she had failed to "complete her documentation in a timely fashion."

13. The Board's investigation revealed the following:

## **II. Practicing Without a License**

14. The Respondent rendered physical therapy<sup>2</sup> treatments to approximately thirty-four (34) patients between May 31, 2002 and July 29, 2002 while her license was expired.

15. The Respondent used the initials "P.T" when she signed the charts of the approximately thirty-four (34) patients she treated while her license was expired between May 31, 2002 and July 29, 2002.

16. By treating patients without a valid license from May 31, 2002 to July 29, 2002, the Respondent violated H.O. §13-316 (16) which prohibits violation of any provision of Title 13 of the H.O. Article or a rule or regulation adopted by the Board. Specifically, the Respondent violated H.O. §13-401 (a) which prohibits practicing without a license; H.O. §13-402(a) which prohibits representing to the public that one is licensed as a physical therapist if not so licensed; H.O. §13-402(b) which prohibits the

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<sup>2</sup> See H.O. §13-102 stating that the term *practice physical therapy* includes (i) performing an evaluation of the physical therapy needs of individuals; (ii) performing and interpreting tests and measurements of neuromuscular and musculoskeletal functions to aid treatment; (iii) planning treatment programs that are based on test findings, and (iv) except as provided in paragraph (3) of this subsection, administering treatment with therapeutic exercise, therapeutic massage, mechanical devices, or therapeutic agents that use the physical chemical, or other properties of air, water, electricity, sound or radiant energy.

use of "P.T." if unlicensed; and/or COMAR 10.38.01.05 B which prohibits the practice of physical therapy after the date of expiration of the license.

### **III. Unprofessional Conduct**

17. On July 24, 2002, the Respondent went to the Board offices and completed an application for reinstatement of her license with the assistance of a Board staff member.

18. On that date, the Respondent signed the following statement:

"I have not practiced as a physical therapist since my license expired.

Donna Willis  
7/24/02"

19. The Respondent submitted the statement described in Paragraph no.18 to the Board with her application for reinstatement.

20. By stating that she had not practiced as a physical therapist since her license expired when she had treated approximately thirty-four (34) patients during that time period, the Respondent violated H.O. §§13-317(1) (fraudulently or deceptively obtains a license) and/or H.O. §13-317 (20) (commits an act of unprofessional conduct).

### **IV. Missing, Late, and Incomplete Documentation of Patient Care**

21. On or about May 21, 2002, Respondent's supervisor gave her a Written Warning about missing and late documentation citing the following:

- There are patients who have been discharged since February 2002, who's [sic] paperwork is not completed.
- Current residents have progress notes that are 1 week to 4 weeks past due.
- Clarification orders not written on date required.
- Certifications (monthly summaries/discharge summaries) are not completed on time.

22. On or about August 16, 2002, the Respondent's supervisor gave her

another Written Warning which cited the following concerns:

1. Documentation not completed when due.
2. Quality of documentation is unacceptable.
3. Not following appropriate work schedule.

23. In an addendum attached to the August 16, 2002 Written Warning, the Respondent's supervisor set forth a list of seven (7) patient charts that were missing thirty (30) day reevaluations, discharge summaries, progress notes, physician orders, restorative documentation, restorative orders, and discharge orders.

24. On or about September 3, 2002, the Respondent received a Final Written Warning from her employer which cited the following:

Problem: Documentation late, absent or not written according to Genesis Rehab Services policy. Documentation included evaluation, monthly certification, discharge summaries, weekly progress notes, daily progress notes, care plans and physician orders.

25. On September 30, 2002, the Respondent's employer issued an Employee Counseling Report stating that,

A 9/27 documentation audit reveals that nine (9) items due between 9/10 and 9/23 were not completed in a timely fashion. These documents included discharge summaries, 30-day re-certification, and one evaluation, and this is despite the Program Manager's significant guidance and requests for follow-up.

26. On September 30, 2002, the Respondent's employer terminated her from employment because of chronic problems with documentation of patient treatment.

### **Patient Specific Allegations**

#### **Patient A.**

27. Patient A (DOB 6/54) initially presented for physical therapy treatment at Knollwood Manor on May 23, 2002.

28. Patient A received physical therapy services approximately five (5) times per week from May 23, 2002 to June 20, 2002.

29. On June 12, 2002 the Respondent reduced Patient A to a schedule of three (3) times per week.

30. During the course of Patient A's treatment, the Respondent rendered physical therapy services to Patient A but failed to write daily progress reports on the following dates:

5/28/02	6/3/02	6/14/02
5/30/02	6/5/02	6/17/02
5/31/02	6/12/02	6/19/02

31. The Respondent wrote the PT Summary for Patient A on September 29, 2002 and marked it "LE<sup>3</sup> for 6/21/02."

32. The Respondent wrote the Discharge Summary for Patient A on September 29, 2002 and marked it as being a late entry for 6/27/02.

33. On July 29, 2002, the Respondent wrote weekly summaries for physical therapy services during the weeks ending May 29, June 4, June 11, June 18 and June 25 of 2002 as late entries in Patient A's treatment record.

#### **Patient B**

34. Patient B (DOB 6/23/49) initially presented for physical therapy services at Knollwood Manor on January 16, 2002.

35. Patient B received physical therapy services approximately five (5) times per week from January 16, 2002 to January 31, 2002.

36. Patient B received physical therapy services approximately three (3) times per week from February 1, 2002 to April 30, 2002.

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<sup>3</sup> Respondent used "LE" as an abbreviation for *Late Entry* in patient charts.



37. During the course of Patient B's treatment, the Respondent rendered physical therapy services to Patient B but failed to write daily progress reports on the following dates:

3/18/02	3/29/02	4/22/02
3/22/02	4/01/02	4/25/02
3/23/02	4/09/02	
3/25/02	4/15/02	

38. The Respondent wrote two (2) PT Summaries for Patient B on September 29, 2002. These entries were marked "LE for 2/14/02" and "LE for 3/15/02" respectively.

39. The Respondent wrote the weekly progress reports for March 26, April 2, April 9, April 16, April 23, and April 30 of 2002 on September 29, 2002. These entries were marked as being late entries.

#### **Patient C**

40. Patient C (DOB 11/10) initially presented for physical therapy treatment at Knollwood Manor on March 25, 2003.

41. Patient C received physical therapy services approximately five (5) times per week from March 25 to June 14 of 2002.

42. Patient C received physical therapy services approximately three (3) times per week from June 14 to June 24 of 2002.

43. During the course of Patient C's treatment, the Respondent rendered physical therapy treatments to Patient C but failed to write daily progress notes on the following dates:

3/25/2002	4/12/2002	5/6/2002	6/3/2002
3/26/2002	4/15/2002	5/7/2002	6/4/2002
3/27/2002	4/18/2002	5/9/2002	6/5/2002
3/28/2002	4/19/2002	5/10/2002	6/10/2002
3/29/2002	4/20/2002	5/13/2002	6/11/2002
4/1/2002	4/22/2002	5/14/2002	6/12/2002
4/2/2002	4/24/2002	5/17/2002	6/13/2002
4/3/2002	4/25/2002	5/20/2002	6/14/2002
4/5/2002	4/26/2002	5/21/2002	6/17/2002
4/8/2002	4/29/2002	5/22/2002	6/19/2002
4/9/2002	5/1/2002	5/23/2002	6/21/2002
4/10/2002	5/3/2002	5/30/2002	

44. On September 26, 2002 the Respondent wrote Patient C's physical therapy Discharge Summary and marked it as a late entry for June 24, 2002.

45. On September 26, 2002, the Respondent wrote Patient C's weekly progress note as a late entry for June 24, 2002 .

46. On September 26, 2002, the Respondent wrote Patient C's monthly physical therapy summaries for April 23, May 23, and June 22, 2002. The Respondent marked each of these entries as late entries.

#### **Patient D**

47. Patient D (DOB 2/22) initially presented for physical therapy services at Knollwood Manor on May 22, 2002.

48. Patient D received physical therapy services approximately five (5) times per week from May 22 to June 22 and then June 26 to July 18 of 2002.

49. During the course of Patient D's treatment, the Respondent rendered physical therapy services to Patient C but failed to write daily progress notes on the following dates:

6/3/2002	6/10/2002	6/14/2002	7/15/2002
6/4/2002	6/11/2002	6/18/2002	7/17/2002
6/5/2002	6/12/2002	7/10/2002	
6/7/2002	6/13/2002	7/11/2002	

50. The Respondent wrote two late entries in Patient D's medical record. On September 4, 2002 she wrote a Summary marked as late entry for June 24, 2002. And on September 17, 2002, she wrote a Discharge Summary marked as late entry for June 22, 2002.

**Patient E**

51. Patient E (DOB 3/52) initially presented for physical therapy services at Knollwood Manor on December 20, 2001.

52. Patient E received physical therapy services approximately five (5) days per week from December 20, 2001 to March 5, 2002.

53. The Respondent did not date the weekly notes written for weeks ending January 16, January 30, February 6, February 13, February 20, February 27 and March 5 of 2002.

54. The Respondent wrote the Discharge Summary for March 11, 2002 on September 26, 2002. Respondent marked this entry "LE" for late entry.

**Patient F**

55. Patient F (DOB 10/47) initially presented for physical therapy services at Knollwood Manor on January 21, 2002.

56. Patient F received physical therapy services approximately five (5) times per week from January 21 to January 31 of 2002.

57. Patient F received physical therapy services approximately three (3) times

per week from January 31 to March 10 and then from March 25 to April 5 of 2002.

58. During the course of Patient F's treatment, the Respondent rendered physical therapy services to Patient F but failed to write daily progress notes on the following dates:

03/26/02	04/02/02
03/29/02	04/04/02

59. The Respondent wrote four (4) late entries in Patient F's medical record. On September 22, 2002, the Respondent wrote a weekly progress note for the week ending April 5, 2002. On September 23, 2002, the Respondent wrote a weekly progress note for the week ending March 31, 2002 and a Discharge Summary for April 5, 2002. On September 29, 2002, the Respondent wrote the Monthly PT Summary for February 19, 2002. The Respondent marked each of these entries as "LE" for late entry.

#### **Patient G**

60. Patient G (DOB 3/53) initially presented for physical therapy services at Knollwood Manor on April 23, 2002.

61. Patient G received physical therapy services approximately five (5) times per week from April 23, 2002 to May 22, 2002.

62. During the course of Patient G's treatment, the Respondent rendered physical therapy services to Patient G but failed to write daily progress notes on the following dates:

4/23/2002	4/30/2002	5/7/2002
4/24/2002	5/1/2002	5/8/2002
4/25/2002	5/2/2002	5/9/2002
4/26/2002	5/3/2002	5/14/2002

63. The Respondent wrote three late entries in Patient G's medical record. On September 5, 2002 she wrote weekly summaries for April 29, May 13 and May 20 of 2002. The Respondent marked all of these entries as late entries.

**Patient H**

64. Patient H (DOB 6/24) initially presented for physical therapy services at Knollwood Manor on May 1, 2002.

65. Patient H received physical therapy services approximately five (5) times per week from May 1, 2002 to June 19, 2002.

66. Patient H also received physical therapy services approximately five (5) times per week from July 17, 2002 to August 22, 2002.

67. During the course of Patient H's treatment, the Respondent rendered physical therapy services to Patient H but failed to write daily progress notes on the following dates:

05/13/02	05/16/02
05/14/02	06/17/02

68. On September 3, 2002, the Respondent wrote Patient H's PT Summary for August 16, 2002. The Respondent marked this note as being a late entry.

**Patient I**

69. Patient I (DOB 7/23) initially presented for physical therapy services on July 26, 2002.

70. Patient I received physical therapy services on July 26<sup>th</sup>, and 27<sup>th</sup> of 2002.

71. The Respondent wrote two late entries in Patient I's medical record. She

wrote a progress note and a discharge summary for July 29, 2002 on August 5 and August 15, 2002 respectively. The Respondent marked both of these notes as late entries.

**Patient J**

72. Patient J (DOB 3/38) initially presented for physical therapy services at Knollwood Manor on January 10, 2002.

73. Patient J received physical therapy services approximately five (5) times per week from January 10, 2002 to September 19, 2002.

74. During the course of Patient J's treatment, the Respondent rendered physical therapy services to Patient J but failed to write daily progress notes on the following dates:

3/18/2002	4/18/02	5/14/02	6/3/02
3/19/2002	4/19.02	5/16/02	6/4/02
3/20/2002	4/20/02	5/17/02	6/7/02
3/21/2002	4/22/02	5/20/02	6/10/02
3/22/2002	4/23/02	5/21/02	6/11/02
3/25/2002	4/25/02	5/10/02	6/13/02
3/26/2002	4/26/02	5/13/02	6/14/02
3/29/2002	4/29/02	5/14/02	6/17/02
4/2/2002	4/30/02	5/16/02	6/18/02
4/4/2002	5/6/02	5/17/02	7/8/02
4/8/2002	5/7/02	5/20/02	7/9/02
4/9/2002	5/10/02	5/21/02	7/11/02
4/15/2002	5/13/02	5/30/02	7/12/02
			7/15/02
			7/16/02

75. The Respondent wrote five (5) late entries in Patient J's medical record. On September 4, 2002, the Respondent wrote thirty (30) day reevaluations for April 6, 2002, May 6, 2002, June 5, 2002, July 5, 2002, and August 3, 2002. The Respondent marked each of these reevaluations as late entries.

76. By failing to properly document patient care as described in paragraphs 21-75, the Respondent violated H.O. §13-317 (20) by committing an act of unprofessional conduct and/or § 13-317 (16) which prohibits violation of any provision of H.O. title 13 or a rule or regulation adopted by the Board. Specifically, the Respondent violated COMAR 10.38.03.02-1 by failing to comply with the Board's requirements for documentation.

### **CONCLUSIONS OF LAW**

Based on the foregoing Findings of Fact, the Board concludes as a matter of law that the Respondent violated §13-316 (1), (2), (16), and (20), §13-401(a), 13-402(a) and (b), Code Md. Regs. Tit. 10 §38.01.05(B) and .38.03.02-1.

### **ORDER**

Based on the foregoing Findings of Fact and Conclusions of Law, it is this 28<sup>th</sup> day of October, 2003, by a majority of the Board, hereby

ORDERED that upon execution of this Consent Order, Respondent's license to practice physical therapy in the State of Maryland is SUSPENDED for TWO (2) YEARS, all but thirty (30) consecutive days of which shall be STAYED; and be it further

ORDERED that the thirty (30) consecutive days of active suspension shall be completed by the Respondent within one (1) year of issuance of this Order and that the Respondent shall provide PRIOR notification to the Board as to when she will be serving the active suspension. The Board may verify the

Respondent's cessation from practice of physical therapy with the Respondent's employer; and it is further

ORDERED that immediately upon execution of this CONSENT ORDER, the Respondent shall be placed on PROBATION for a period of at least two (2) years; and be it further

ORDERED that after two (2) years of probation, the Respondent may petition the Board to be reinstated without any conditions or restrictions on the Respondent's license, provided the Respondent can demonstrate compliance with the conditions of this Order. Should the Respondent fail to demonstrate compliance, the Board may impose additional terms and conditions of Probation, as it deems necessary; and be it further

ORDERED that the Respondent shall enroll in and successfully complete the Maryland Physical Therapy Law course within the first year of probation and that the Respondent may apply this course towards her continuing education requirements for her next licensure renewal; and be it further

ORDERED that the Board shall conduct documentation reviews of patient records during the probationary period. Each documentation review shall consist of at least six (6) randomly selected patient records. The Reviews shall be conducted in accordance with the following schedule:

- a. Monthly for the first six months
- b. Quarterly for the remaining period of probation.

and it is further



**ORDERED** that throughout the probationary period, the Respondent shall submit, on a quarterly basis, documentation from the Respondent's therapist regarding her treatment and medications for Attention Deficit Disorder; it is further

**ORDERED** that the Respondent shall immediately notify the Board in writing of any change in employer or employment status during the period of Probation; and it is further

**ORDERED** that the Respondent shall practice in accordance with the laws and regulations governing the practice of physical therapy in Maryland; and it is further

**ORDERED** that should the Board receive a report that the Respondent's practice is a threat to the public health, welfare and safety, the Board may take immediate action against the Respondent's license, including suspension or revocation, providing notice and an opportunity to be heard are provided to the Respondent in a reasonable time thereafter. Should the Board receive in good faith information that the Respondent has substantially violated the Act or if the Respondent violated any conditions of this Order, after providing the Respondent with notice and an opportunity for a hearing, the Board may take further disciplinary action against the Respondent, including suspension or revocation of the Respondent's license. The Respondent shall have the burden of proof to demonstrate compliance with this Order in any action brought against the

Respondent as a result of a substantiated breach of the conditions of the Order;  
and it is further

ORDERED that if the Respondent fails to comply with any of the terms or  
conditions set forth above, that failure shall be deemed a violation of this Order;  
and it is further

ORDERED that the Respondent shall pay all costs associated with this  
ORDER, and it is further

ORDERED that for purposes of public disclosure, as permitted by Md.  
State Gov't Code Ann. §10-617 (h) (Repl. Vol.1999), this document consists of  
the forgoing Findings of Fact, Conclusions of Law and Order and that the Board  
may also disclose same to any national reporting data bank to which it is  
mandated to report.

10/28/03  
Date

John Shober, P.T.  
~~Margery Rodgers, P.T.~~ John Shober, P.T.  
Vice Chairperson  
Board of Physical Therapy Examiners

**CONSENT**

I, Donna Willis, P.T., by affixing my signature hereto, acknowledge that:

1. I am represented by an attorney.
2. I am aware that, without my consent, my license to practice  
physical therapy in this State cannot be limited except pursuant to the provisions  
of §13-317 of the Act and §§10-201 et seq. of the Administrative Procedure Act  
codified in the State Government Article of the Annotated Code of Maryland.

3. I am aware that I am entitled to a full evidentiary hearing before this Board.

4. By this Consent Order, I hereby admit the truth of the Findings of Fact and Conclusions of Law and accept and submit to the foregoing Order and its conditions.

5. I acknowledge the validity of the Order as if made after a hearing in which I would have had the right to counsel, to confront witnesses, to give testimony, to call witnesses on my own behalf, and to all other substantive and procedural protections provided by law and I waive any appeal right under Maryland State Gov't Code Ann. §10-222.

6. I acknowledge that by my failure to abide by the conditions of this Consent Order, I may suffer additional disciplinary action against my license to practice physical therapy in the State of Maryland.

7. I understand that this Consent Order is a public document, disclosable under §10-617(h)(2)(vi) of the Md. Code Ann. State Gov't.

8. I fully understand the language, meaning, and terms of this Consent Order.

10/22/03  
Date

Donna M Willis  
Donna Willis, P.T., License No.: 16560  
Respondent

State of: Maryland

City/County of: Baltimore

I HEREBY CERTIFY that on this 22nd day of October,  
2003, before me, a Notary of the State of Maryland and the City/County of  
Baltimore, personally appeared Donna Willis, P.T. and made  
oath in due form of law that signing the foregoing Consent Order was her  
voluntary act and deed, and that the statements made herein are true and  
correct.

AS WITNESS my hand and notarial seal.



A large, stylized handwritten signature in black ink, written over a horizontal line. The signature is cursive and appears to be the name of the notary.

NOTARY

11/1/04

My Commission Expires: