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7 *Attorneys for Complainant*

8  
9 **BEFORE THE**  
**BOARD OF BEHAVIORAL SCIENCES**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. IM-2010-1776

13 **SRBUI OVSEPYAN**  
14 14100 Calvert Street, #3  
Van Nuys, CA 91401

**A C C U S A T I O N**

15 Marriage and Family Therapist Intern  
16 Registration No. IMF 56711

17 Respondent.

18  
19 Complainant alleges:

20 **PARTIES**

- 21 1. Kim Madsen (Complainant) brings this Accusation solely in her official capacity as  
22 the Executive Officer of the Board of Behavioral Sciences, Department of Consumer Affairs.
- 23 2. On or about May 20, 2008, the Board of Behavioral Sciences (Board) issued  
24 Marriage and Family Therapist Intern Registration No. IMF 56711 to Srbui Ovsepyan  
25 (Respondent). The Marriage and Family Therapist Intern Registration was in full force and effect  
26 at all times relevant to the charges brought herein and will expire on May 31, 2013, unless  
27 renewed.

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1 registration of any person, other than one who is licensed as a physician and surgeon, who uses or  
2 offers to use drugs in the course of performing marriage and family therapy services.

3 . . . .

4 "(e) Violating, attempting to violate, or conspiring to violate any of the provisions of this  
5 chapter or any regulation adopted by the board."

6 **COST RECOVERY**

7 8. Section 125.3 provides, in pertinent part, that the Board may request the  
8 administrative law judge to direct a licentiate found to have committed a violation or violations of  
9 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
10 enforcement of the case.

11 **FIRST CAUSE FOR DISCIPLINE**

12 **(Conviction of a Substantially-Related Crime)**

13 9. Respondent is subject to disciplinary action under sections 490 and 4982, subdivision  
14 (a), in that Respondent was convicted of a crime that was substantially related to the  
15 qualifications, functions, and duties of a licensee, as follows:

16 a. On or about September 15, 2010, after pleading *nolo contendere*, Respondent was  
17 convicted of one misdemeanor count of violating Vehicle Code section 23152, subdivision (b)  
18 [driving while having 0.08% and more, by weight, of alcohol in her blood], in the criminal  
19 proceeding entitled *The People of the State of California v. Srbui Ovsepyan* (Super. Ct. Los  
20 Angeles County, 2010, No. 0VY02846). The court sentenced Respondent to 2 days in jail, placed  
21 her on probation for a period of 36 months and fined her.

22 b. The circumstances surrounding the conviction are that on or about May 27, 2010,  
23 officers from the Los Angeles Police Department were dispatched to investigate a traffic  
24 collision. Upon arrival at the scene, the officers interviewed and identified Respondent as the  
25 driver of a vehicle involved in the collision. During the investigation, the officers observed  
26 Respondent to have slow slurred speech, red blood shot eyes, and a strong smell of an alcoholic  
27 beverage emitting from her mouth. Respondent admitted to the officers that she had, "Some Sake  
28 with dinner." Respondent attempted to perform a series of field sobriety tests, which she failed.

1 Respondent was subsequently given two (PAS) Preliminary Alcohol Screening Device Tests with  
2 results of .198% BAC and .201% BAC. Respondent gave two additional breath samples while at  
3 Van Nuys Police Station with readings of .18% BAC and .17% BAC.

4 **SECOND CAUSE FOR DISCIPLINE**

5 **(Dangerous Use of Alcohol)**

6 10. Respondent is subject to disciplinary action under section 4982, subdivision (c), on  
7 the grounds of unprofessional conduct, in that Respondent consumed alcoholic beverages to an  
8 extent or in a manner that was dangerous or injurious to herself, another person, or the public.  
9 Complainant refers to, and by this reference incorporates, the allegations set forth above in  
10 paragraph 9, inclusive, as though set forth fully.

11 **THIRD CAUSE FOR DISCIPLINE**

12 **(Unprofessional Conduct/ Violate Act)**

13 11. Respondent is subject to disciplinary action under sections 4982, subdivision (e), on  
14 the grounds of unprofessional conduct, in that Respondent was engaged in acts that violated the  
15 provisions of the Behavioral Sciences Act. Complainant refers to, and by this reference  
16 incorporates, the allegations set forth above in paragraphs 9 and 10, inclusive, as though set forth  
17 fully.

18 **PRAYER**

19 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
20 and that following the hearing, the Board of Behavioral Sciences issue a decision:

21 1. Revoking or suspending Marriage and Family Therapist Intern Registration Number  
22 IMF 56711, issued to Srbui Ovsepyan;

23 2. Ordering Srbui Ovsepyan to pay the Board of Behavioral Sciences the reasonable  
24 costs of the investigation and enforcement of this case, pursuant to Business and Professions  
25 Code section 125.3;

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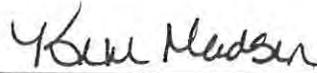
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3. Taking such other and further action as deemed necessary and proper.

DATED: August 2, 2012



KIM MADSEN  
Executive Officer  
Board of Behavioral Sciences  
Department of Consumer Affairs  
State of California  
*Complainant*

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