

**BEFORE THE  
BOARD OF BEHAVIORAL SCIENCES  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

**LARISA V. FEOKTISTOVA**  
999 Broadway #8  
San Francisco, California 94133

Marriage and Family Therapist Intern  
Registration No. IMF 42749

Respondent.

Case No. IM-2004-282

OAH No. 2007060835

**DECISION AND ORDER**

The attached Stipulated Surrender of Registration and Order is hereby adopted by the Board of Behavioral Sciences, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on June 6, 2008.

It is so ORDERED May 7, 2008.

  
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FOR THE BOARD OF BEHAVIORAL SCIENCES  
DEPARTMENT OF CONSUMER AFFAIRS

1 EDMUND G. BROWN JR., Attorney General  
of the State of California  
2 FRANK H. PACOE  
Supervising Deputy Attorney General  
3 JONATHAN D. COOPER, State Bar No. 141461  
Deputy Attorney General  
4 455 Golden Gate Avenue, Suite 11000  
San Francisco, CA 94102-7004  
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6 Attorneys for Complainant  
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8 **BEFORE THE**  
9 **BOARD OF BEHAVIORAL SCIENCES**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

13 **LARISA V. FEOKTISTOVA**  
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15 Marriage and Family Therapist Intern  
Registration No. IMF 42749

16 Respondent.

Case No. IM-2004-282

OAH No. 2007060835

**STIPULATED SURRENDER OF  
REGISTRATION AND ORDER**

17 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this  
18 proceeding that the following matters are true:

19 **PARTIES**

20 1. Paul Riches (Complainant) is the Executive Officer of the Board of  
21 Behavioral Sciences. He brought this action solely in his official capacity and is represented in  
22 this matter by Edmund G. Brown Jr., Attorney General of the State of California, by Jonathan D.  
23 Cooper, Deputy Attorney General.

24 2. Larisa V. Feoktistova (Respondent) is represented in this proceeding by  
25 attorney John Feeney, whose address is 88 Kearney Street, 10th Floor, San Francisco, CA,  
26 94108.

27 3. On or about February 11, 2003, the Board of Behavioral Sciences issued  
28 Marriage and Family Therapist Intern Registration No. IMF 42749 to Larisa V. Feoktistova

1 (Respondent). The registration was in full force and effect at all times relevant to the charges  
2 brought in Accusation No. IM-2004-282 and will expire on February 29, 2008, unless renewed.

3 **JURISDICTION**

4 4. Accusation No. IM-2004-282 was filed before the Board of Behavioral  
5 Sciences (Board) , Department of Consumer Affairs, and is currently pending against  
6 Respondent. The Accusation and all other statutorily required documents were properly served  
7 on Respondent on May 21, 2007. Respondent timely filed her Notice of Defense contesting the  
8 Accusation. A copy of Accusation No. IM-2004-282 is attached as exhibit A and incorporated  
9 herein by reference.

10 **ADVISEMENT AND WAIVERS**

11 5. Respondent has carefully read, fully discussed with counsel, and  
12 understands the charges and allegations in Accusation No. IM-2004-282. Respondent also has  
13 carefully read, fully discussed with counsel, and understands the effects of this Stipulated  
14 Surrender of Registration and Order.

15 6. Respondent is fully aware of her legal rights in this matter, including the  
16 right to a hearing on the charges and allegations in the Accusation; the right to be represented by  
17 counsel, at her own expense; the right to confront and cross-examine the witnesses against her;  
18 the right to present evidence and to testify on her own behalf; the right to the issuance of  
19 subpoenas to compel the attendance of witnesses and the production of documents; the right to  
20 reconsideration and court review of an adverse decision; and all other rights accorded by the  
21 California Administrative Procedure Act and other applicable laws.

22 7. Respondent voluntarily, knowingly, and intelligently waives and gives up  
23 each and every right set forth above.

24 **CULPABILITY**

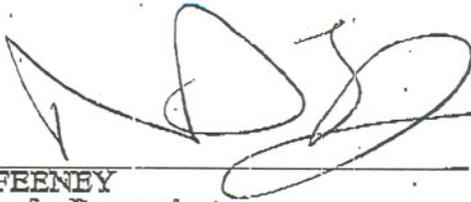
25 8. Respondent admits the truth of each and every charge and allegation in  
26 Accusation No. IM-2004-282, agrees that cause exists for discipline and hereby surrenders her  
27 Marriage and Family Therapist Intern Registration No. IMF 42749 for the Board's formal  
28 acceptance.





1 Order. I approve its form and content.

2 DATED: Feb 27, 08



JOHN FEENEY  
Attorney for Respondent

ENDORSEMENT

6 The foregoing Stipulated Surrender of Registration and Order is hereby  
7 respectfully submitted for consideration by the Board of Behavioral Sciences of the Department  
8 of Consumer Affairs.

9 DATED: 2/28/08

10 EDMUND G. BROWN JR., Attorney General  
of the State of California

11 FRANK H. PACOE  
12 Supervising Deputy Attorney General



JONATHAN D. COOPER  
Deputy Attorney General

Attorneys for Complainant

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**Exhibit A**

**Accusation No. IM-2004-282**

1 EDMUND G. BROWN JR., Attorney General  
of the State of California  
2 FRANK H. PACOE  
Supervising Deputy Attorney General  
3 JONATHAN D. COOPER, State Bar No. 141461  
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455 Golden Gate Avenue, Suite 11000  
5 San Francisco, CA 94102-7004  
Telephone: (415) 703-1404  
6 Facsimile: (415) 703-5480

7 Attorneys for Complainant

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

11 In the Matter of the Accusation Against:  
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999 Broadway Street #8  
13 San Francisco, California 94133  
14 Marriage and Family Therapist Intern  
Registration No. IMF 42749  
15  
16 Respondent.

Case No. IM-2004-282  
OAH No.  
**ACCUSATION**

17 Complainant alleges:

18 **PARTIES**

- 19 1. Paul Riches (Complainant) brings this Accusation solely in his official  
20 capacity as the Executive Officer of the Board of Behavioral Sciences, Department of Consumer  
21 Affairs.  
22 2. On or about February 11, 2003, the Board of Behavioral Sciences issued  
23 Marriage and Family Therapist Intern Registration Number IMF 42749 to Larisa V. Feoktistova  
24 (Respondent). The Marriage and Family Therapist Intern Registration was in full force and  
25 effect at all times relevant to the charges brought herein and will expire on February 29, 2008,  
26 unless renewed.

27 **JURISDICTION**

- 28 3. This Accusation is brought before the Board of Behavioral Sciences

1 (Board), Department of Consumer Affairs, under the authority of the following laws. All section  
2 references are to the Business and Professions Code unless otherwise indicated.

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

7 5. Section 822 of the Code states:

8 "If a licensing agency determines that its licentiate's ability to practice his or her  
9 profession safely is impaired because the licentiate is mentally ill, or physically ill affecting  
10 competency, the licensing agency may take action by any one of the following methods:

11 (a) Revoking the licentiate's certificate or license.

12 (b) Suspending the licentiate's right to practice.

13 (c) Placing the licentiate on probation.

14 (d) Taking such other action in relation to the licentiate as the licensing agency in  
15 its discretion deems proper.

16 The licensing agency shall not reinstate a revoked or suspended certificate or  
17 license until it has received competent evidence of the absence or control of the condition which  
18 caused its action and until it is satisfied that with due regard for the public health and safety the  
19 person's right to practice his or her profession may be safely reinstated."

20 6. Section 4982 of the Code states, in pertinent part:

21 "The board may refuse to issue any registration or license, or may suspend or  
22 revoke the license or registration of any registrant or licensee if the applicant, licensee, or  
23 registrant has been guilty of unprofessional conduct. Unprofessional conduct shall include, but  
24 not be limited to:

25 "(a) The conviction of a crime substantially related to the qualifications, functions,  
26 or duties of a licensee or registrant under this chapter. The record of conviction shall be  
27 conclusive evidence only of the fact that the conviction occurred. The board may inquire into the  
28 circumstances surrounding the commission of the crime in order to fix the degree of discipline or

1 to determine if the conviction is substantially related to the qualifications, functions, or duties of  
2 a licensee or registrant under this chapter. A plea or verdict of guilty or a conviction following a  
3 plea of nolo contendere made to a charge substantially related to the qualifications, functions, or  
4 duties of a licensee or registrant under this chapter shall be deemed to be a conviction within the  
5 meaning of this section. The board may order any license or registration suspended or revoked, or  
6 may decline to issue a license or registration when the time for appeal has elapsed, or the  
7 judgment of conviction has been affirmed on appeal, or, when an order granting probation is  
8 made suspending the imposition of sentence, irrespective of a subsequent order under Section  
9 1203.4 of the Penal Code allowing the person to withdraw a plea of guilty and enter a plea of not  
10 guilty, or setting aside the verdict of guilty, or dismissing the accusation, information, or  
11 indictment.”

12 “...”

13 "(k) Engaging in sexual relations with a client, or a former client within two years  
14 following termination of therapy, soliciting sexual relations with a client, or committing an act of  
15 sexual abuse, or sexual misconduct with a client, or committing an act punishable as a sexually  
16 related crime, if that act or solicitation is substantially related to the qualifications, functions, or  
17 duties of a marriage and family therapist.

#### 18 COST RECOVERY

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

#### 23 FACTUAL SUMMARY

24 8. On or about September 29 - October 1, 2003, Respondent forcibly  
25 restrained J.M. in Respondent's apartment. Respondent bound J.M. with rope and hand cuffs  
26 and removed J.M.'s clothing. Respondent forced J.M. to ingest drugs. Respondent covered  
27 J.M.'s eyes and mouth with duct tape. Respondent struck J.M. on various parts of J.M.'s body  
28 and threatened J.M. with a knife and/or a gun. Respondent then sexually assaulted J.M.



