

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

In the Matter of the Accusation Against:

TANYA LYNN FRIEDLINGHAUS
8418 Glider Avenue
Los Angeles, CA 90045

Marriage and Family Therapist Intern
Registration No. IMF 65356

Respondent.

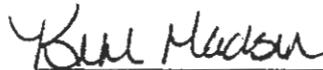
Case No. IM-2013-1721

DECISION AND ORDER

The attached Stipulated Surrender of License 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 April 15, 2015.

It is so ORDERED April 15, 2015.



FOR THE BOARD OF BEHAVIORAL SCIENCES
DEPARTMENT OF CONSUMER AFFAIRS

1 KAMALA D. HARRIS
Attorney General of California
2 JAMES M. LEDAKIS
Supervising Deputy Attorney General
3 NICOLE R. TRAMA
Deputy Attorney General
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Attorneys for Complainant

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

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12 In the Matter of the Accusation Against:

13 **TANYA LYNN FRIEDLINGHAUS**
14 **8418 Glider Avenue**
Los Angeles, CA 90045

15 **Marriage and Family Therapist Intern**
16 **Registration No. IMF 65356**

17 Respondent.

Case No. IM-2013-1721

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
19 entitled proceedings that the following matters are true:

20 PARTIES

21 1. Kim Madsen (Complainant) is the Executive Officer of the Board of Behavioral
22 Sciences. She brought this action solely in her official capacity and is represented in this matter
23 by Kamala D. Harris, Attorney General of the State of California, by Nicole R. Trama, Deputy
24 Attorney General.

25 2. Tanya Lynn Friedlinghaus (Respondent) is represented in this proceeding by attorney
26 Christopher J. Zopatti, whose address is 2601 Main Street, Ste. 800, Irvine, CA 92614.

27 3. On or about November 15, 2010, the Board of Behavioral Sciences issued Marriage
28 and Family Therapist Intern Registration No. IMF 65356 to Tanya Lynn Friedlinghaus

1 (Respondent). The Marriage and Family Therapist Intern Registration was in full force and effect
2 at all times relevant to the charges brought in Accusation No. IM-2013-1721 and will expire on
3 November 30, 2015, unless renewed.

4 JURISDICTION

5 4. Accusation No. IM-2013-1721 was filed before the Board of Behavioral Sciences
6 (Board), Department of Consumer Affairs, and is currently pending against Respondent. The
7 Accusation and all other statutorily required documents were properly served on Respondent on
8 December 9, 2014. Respondent timely filed her Notice of Defense contesting the Accusation. A
9 copy of Accusation No. IM-2013-1721 is attached as Exhibit A and incorporated by reference.

10 ADVISEMENT AND WAIVERS

11 5. Respondent has carefully read, fully discussed with counsel, and understands the
12 charges and allegations in Accusation No. IM-2013-1721. Respondent also has carefully read,
13 fully discussed with counsel, and understands the effects of this Stipulated Surrender of License
14 and Order.

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

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

23 CULPABILITY

24 8. Respondent understands that the charges and allegations in Accusation No. IM-2013-
25 1721, if proven at a hearing, constitute cause for imposing discipline upon her Marriage and
26 Family Therapist Intern Registration.

27 9. For the purpose of resolving the Accusation without the expense and uncertainty of
28 further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual

1 basis for the charges in the Accusation and that those charges constitute cause for discipline.
2 Respondent hereby gives up her right to contest that cause for discipline exists based on those
3 charges.

4 10. Respondent understands that by signing this stipulation she enables the Board to issue
5 an order accepting the surrender of her Marriage and Family Therapist Intern Registration without
6 further process.

7 CONTINGENCY

8 11. This stipulation shall be subject to approval by the Board of Behavioral Sciences.
9 Respondent understands and agrees that counsel for Complainant and the staff of the Board of
10 Behavioral Sciences may communicate directly with the Board regarding this stipulation and
11 surrender, without notice to or participation by Respondent or her counsel. By signing the
12 stipulation, Respondent understands and agrees that she may not withdraw her agreement or seek
13 to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails
14 to adopt this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary
15 Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal
16 action between the parties, and the Board shall not be disqualified from further action by having
17 considered this matter.

18 12. The parties understand and agree that Portable Document Format (PDF) and facsimile
19 copies of this Stipulated Surrender of License and Order, including PDF and facsimile signatures
20 thereto, shall have the same force and effect as the originals.

21 13. This Stipulated Surrender of License and Order is intended by the parties to be an
22 integrated writing representing the complete, final, and exclusive embodiment of their agreement.
23 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
24 negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order
25 may not be altered, amended, modified, supplemented, or otherwise changed except by a writing
26 executed by an authorized representative of each of the parties.

27 14. In consideration of the foregoing admissions and stipulations, the parties agree that
28 the Board may, without further notice or formal proceeding, issue and enter the following Order:

ORDER

1
2 IT IS HEREBY ORDERED that Marriage and Family Therapist Intern Registration No.
3 IMF 65356, issued to Respondent Tanya Lynn Friedlinghaus, is surrendered and accepted by the
4 Board of Behavioral Sciences.

5 1. The surrender of Respondent's Marriage and Family Therapist Intern Registration
6 and the acceptance of the surrendered license by the Board shall constitute the imposition of
7 discipline against Respondent. This stipulation constitutes a record of the discipline and shall
8 become a part of Respondent's license history with the Board of Behavioral Sciences.

9 2. Respondent shall lose all rights and privileges as a marriage and family therapist
10 intern in California as of the effective date of the Board's Decision and Order.

11 3. Respondent shall cause to be delivered to the Board her pocket license and, if one was
12 issued, her wall certificate on or before the effective date of the Decision and Order.

13 4. Respondent fully understands that when the Board adopts the license surrender of
14 Respondent's license, Respondent will no longer be permitted to practice as a marriage and family
15 therapist intern in California. Respondent further understands that the surrender of her license,
16 upon adoption, shall be considered to be a disciplinary action and shall become a part of
17 Respondent's license history with the Board.

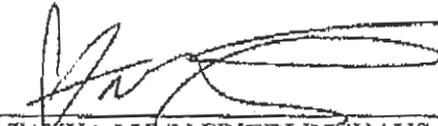
18 5. Respondent further agrees that with the adoption by the Board of her license
19 surrender, Respondent may not petition the Board for reinstatement of the surrendered license.
20 Respondent may reapply to the Board for licensure three years from the date of surrender and
21 must meet all current requirements for licensure including, but not limited, to filing a current
22 application, meeting all current educational and experience requirements, and taking and passing
23 any and all examinations required of new applicants.

24 6. Respondent understands that should she ever reapply for licensure as a marriage and
25 family therapist intern or should she ever apply for any other registration or licensure issued by
26 the Board, or by the Board of Psychology, all of the charges contained in Accusation No. IM-
27 2013-1721 shall be deemed admitted for the purpose of any Statement of Issues or other
28 proceeding seeking to deny such application or reapplication.

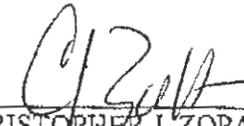
1 7. Respondent shall pay the agency its costs of investigation and enforcement in the
2 amount of \$2,871.67 prior to issuance of a new license.

3 ACCEPTANCE

4 I have carefully read the above Stipulated Surrender of License and Order and have fully
5 discussed it with my attorney, Christopher J. Zopatti. I understand the stipulation and the effect it
6 will have on my Marriage and Family Therapist Intern Registration. I enter into this Stipulated
7 Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound
8 by the Decision and Order of the Board of Behavioral Sciences.

9
10 DATED: 3/18/15 
11 TANYA LYNN FRIEDLINGHAUS
12 Respondent

13 I have read and fully discussed with Respondent Tanya Lynn Friedlinghaus the terms and
14 conditions and other matters contained in this Stipulated Surrender of License and Order. I
15 approve its form and content.

16 DATED: 3/19/15 
17 CHRISTOPHER J. ZOPATTI
18 Attorney for Respondent

19 ENDORSEMENT

20 The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted
21 for consideration by the Board of Behavioral Sciences of the Department of Consumer Affairs.

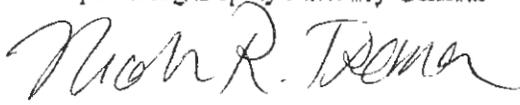
22 Dated: 3/19/2015 Respectfully submitted,
23 KAMALA D. HARRIS
24 Attorney General of California
25 JAMES M. LEDAKIS
26 Supervising Deputy Attorney General
27 
28 NICOLE R. TRAMA
Deputy Attorney General
Attorneys for Complainant

Exhibit A

Accusation No. IM-2013-1721

1 KAMALA D. HARRIS
Attorney General of California
2 JAMES M. LEDAKIS
Supervising Deputy Attorney General
3 NICOLE R. TRAMA
Deputy Attorney General
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10 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

11
12 Case No. IM-2013-1721

13 In the Matter of the Accusation Against:

14 **TANYA LYNN FRIEDLINGHAUS**
8418 Glider Avenue
Los Angeles, CA 90045

A C C U S A T I O N

15 **Marriage and Family Therapist Intern**
16 **Registration No. IMF 65356**

17 Respondent.

18 Complainant alleges:

19 **PARTIES**

- 20 1. Kim Madsen (Complainant) brings this Accusation solely in her official capacity as
21 the Executive Officer of the Board of Behavioral Sciences, Department of Consumer Affairs.
22 2. On or about November 15, 2010, the Board of Behavioral Sciences issued Marriage
23 and Family Therapist Intern Registration Number IMF 65356 to Tanya Lynn Friedlinghaus
24 (Respondent). The Marriage and Family Therapist Intern Registration expired on November 30,
25 2011 due to non-payment of renewal fees and was subsequently renewed on March 15, 2012.
26 The Registration will expire on November 30, 2015, unless renewed.
27
28

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JURISDICTION

3. This Accusation is brought before the Board of Behavioral Sciences (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

4. Section 118, subdivision (b), of the Code provides that the suspension, expiration, surrender, or cancellation of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated.

STATUTORY PROVISIONS

10 5. Section 4980, subdivision (b) states:

11 No person may engage in the practice of marriage and family therapy as
12 defined by Section 4980.02, unless he or she holds a valid license as a marriage
13 and family therapist, or unless he or she is specifically exempted from that
14 requirement, nor may any person advertise himself or herself as performing the
15 services of a marriage, family, child, domestic, or marital consultant, or in any way
16 use these or any similar titles, including the letters "M.F.T." or "M.F.C.C.," or
17 other name, word initial, or symbol in connection with or following his or her
18 name to imply that he or she performs these services without a license as provided
19 by this chapter. Persons licensed under Article 4 (commencing with Section 4996)
20 of Chapter 14 of Division 2, or under Chapter 6.6 (commencing with Section
21 2900) may engage in such practice or advertise that they practice marriage and
22 family therapy but may not advertise that they hold the marriage and family
23 therapist's license.

24 6. Section 4980.02 of the Code states:

25 For the purposes of this chapter, the practice of marriage and family therapy
26 shall mean that service performed with individuals, couples, or groups wherein
27 interpersonal relationships are examined for the purpose of achieving more
28 adequate, satisfying, and productive marriage and family adjustments. This
practice includes relationship and premarriage counseling.

The application of marriage and family therapy principles and methods includes, but is not limited to, the use of applied psychotherapeutic techniques, to enable individuals to mature and grow within marriage and the family, the provision of explanations and interpretations of the psychosexual and psychosocial aspects of relationships, and the use, application, and integration of the coursework and training required by Sections 4980.36, 4980.37, and 4980.41, as applicable.

1 (D) That he or she is supervised by a licensed person.

2 (2) The abbreviation "MFTI" shall not be used in an advertisement unless
3 the title "marriage and family therapist registered intern" appears in the
4 advertisement.

5 9. Section 4982 of the Code states, in part:

6 The board may deny a license or registration or may suspend or revoke the
7 license or registration of a licensee or registrant if he or she has been guilty of
8 unprofessional conduct. Unprofessional conduct includes, but is not limited to, the
9 following:

10

11 (c) Administering to himself or herself any controlled substance or using of
12 any of the dangerous drugs specified in Section 4022, or of any alcoholic beverage
13 to the extent, or in a manner, as to be dangerous or injurious to the person applying
14 for a registration or license or holding a registration or license under this chapter,
15 or to any other person, or to the public, or, to the extent that the use impairs the
16 ability of the person applying for or holding a registration or license to conduct
17 with safety to the public the practice authorized by the registration or license. The
18 board shall deny an application for a registration or license or revoke the license or
19 registration of any person, other than one who is licensed as a physician and
20 surgeon, who uses or offers to use drugs in the course of performing marriage and
21 family therapy services.

22 (d) Gross negligence or incompetence in the performance of marriage and
23 family therapy.

24

25 (i) Intentionally or recklessly causing physical or emotional harm to any
26 client.

27

28 (m) Failure to maintain confidentiality, except as otherwise required or
permitted by law, of all information that has been received from a client in
confidence during the course of treatment and all information about the client that
is obtained from tests or other means.

. . . .

(s) Performing or holding oneself out as being able to perform professional
services beyond the scope of one's competence, as established by one's education,
training, or experience. This subdivision shall not be construed to expand the
scope of the license authorized by this chapter.

. . . .

1 (u) The violation of any statute or regulation governing the gaining and
supervision of experience required by this chapter.

2 (v) Failure to keep records consistent with sound clinical judgment, the
3 standards of the profession, and the nature of the services being rendered.

4

5 REGULATORY PROVISIONS

6 10. California Code of Regulations, title 16, section 1845 provides:

7 As used in Section 4982 of the code, unprofessional conduct includes, but is
8 not limited to:

9 (a) Performing or holding himself or herself out as able to perform
10 professional services beyond his or her field or fields of competence as established
by his or her education, training and/or experience.

11 (b) Permitting a trainee or intern under his or her supervision or control to
12 perform or permitting the trainee or intern to hold himself or herself out as
13 competent to perform professional services beyond the trainee's or intern's level of
education, training and/or experience.

14 (c) Failing to comply with the child abuse reporting requirements of Penal
Code Section 11166.

15 (d) Failing to comply with the elder and dependent adult abuse reporting
16 requirements of Welfare and Institutions Code Section 15630.

17 (e) Failure to provide to the board, as authorized by law, copies of records
18 within 15 days of receipt of the request or within the time specified in the request,
19 whichever is later, unless the licensee or registrant is unable to provide the records
within this time period for good cause.

20 Good cause includes, but is not limited to, physical inability to access the
21 records in the time allowed due to illness or travel, or inability to obtain the
22 necessary patient release authorization, if applicable. This subsection shall not
apply to a licensee or registrant who does not have access to, and control over,
medical records.

23 (f) Failure to cooperate and participate in any board investigation pending
24 against the licensee or registrant. This subsection shall not be construed to deprive
25 a licensee, registrant, or a consumer of any rights or privilege guaranteed by the
26 Fifth Amendment to the Constitution of the United States, or any other
27 constitutional or statutory rights or privileges. This subsection shall not be
28 construed to require a licensee or registrant to cooperate with a request that would
require the licensee, registrant, or a consumer to waive any constitutional or
statutory rights or privilege or to comply with a request for information or other
matters within an unreasonable period of time in light of the time constraints of the

1 licensee's or registrant's practice. Any exercise by a licensee or registrant of any
2 constitutional or statutory rights or privilege shall not be used against the licensee
or registrant in a regulatory or disciplinary proceeding against the licensee or
registrant.

3 (g) Failure to report to the board within 30 days any of the following:

4 (1) A conviction of any felony or misdemeanor, which is not subject to
5 Health & Safety Code sections 11357(b), (c), (d), (e) or 11360(b). A conviction
6 includes any verdict of guilty, or plea of guilty or no contest.

7 (2) Any disciplinary action taken by another licensing entity or authority of
8 this state or of another state or an agency of the federal government or the United
States military.

9 (h) Failure to provide, within 30 days of a request, documentation to the
10 Board regarding the arrest of the licensee or registrant, except for records of
convictions or arrests protected under Penal Code section 1000.4, or Health and
11 Safety Code sections 11361.5 and 11361.7.

12 (i) Failure or refusal to comply with a court order, issued in the enforcement
of a subpoena, mandating the release of records to the board.

13 COSTS

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

18 FACTUAL ALLEGATIONS

19 12. Respondent was issued a Marriage and Family Therapist Intern Registration Number
20 on November 15, 2010. The Marriage and Family Therapist Intern Registration expired on
21 November 30, 2011 due to non-payment of renewal fees. The Registration was not renewed until
22 March 15, 2012. Therefore, for the period of November 30, 2011 to March 15, 2012, Respondent
23 was not registered/licensed to practice.

24 13. From January 2010 to August 2010, Respondent provided therapy to R.A., while
25 working as a trainee at Chapman University. Respondent continued to provide these services in
26 February 2011, when she became a Marriage and Family Therapist Intern for Jessica P., MFT.
27 Respondent continued to provide treatment to R.A. until approximately November 2012.
28

1 14. During the time that Respondent treated R.A., Respondent engaged in unethical dual
2 relationships with R.A. by engaging in a close personal friendship with R.A., among other roles.
3 Respondent spent the night at R.A.'s house, ingested alcoholic beverages with R.A., had dinner
4 with R.A., hugged R.A., held excessively lengthy psychotherapy sessions with R.A. with some
5 sessions lasting until 4:00 a.m., and offered services while under the influence of narcotics.
6 Respondent sold Herbal Life products to R.A. as part of her MFT treatment, borrowed clothes
7 from R.A., shopped with R.A., and changed her clothes for dates at R.A.'s home.

8 15. During several treatment sessions, R.A. observed Respondent to be under the
9 influence of cocaine. In addition, both R.A. and Respondent consumed alcohol during numerous
10 other therapy sessions. For several sessions, Respondent provided treatment to R.A. at R.A.'s
11 home or at Respondent's home. Respondent disclosed confidential information about other
12 patients to R.A., such as her patient who was a "50 year old virgin." Respondent also made
13 inappropriate self-disclosures in the course of the treatment process and allowed a form of role
14 reversal to develop where she allowed R.A. to be a psychotherapist to her. Respondent also
15 accepted direct payment from R.A. for her MFT services.

16 16. Respondent made decisions for R.A. rather than helping R.A. make decisions for
17 herself. In doing so, Respondent's practice created a dependency in R.A., rather than focusing to
18 increase R.A.'s autonomy. For example, Respondent gave R.A. specific advice and directions
19 regarding R.A.'s relationship with her son, with men R.A. was dating, and in other areas of
20 R.A.'s life. Respondent also used her professional relationship with R.A. to further Respondent's
21 own interests. For example, Respondent exploited R.A. financially by charging R.A. for
22 excessively long and unnecessary sessions. In addition, Respondent used R.A. as a therapist for
23 herself by offering intimate self-disclosures about her drug use, her sexual life and other intimate
24 details of her life.

25 17. In early March 2012, Respondent informed R.A. that her Marriage and Family
26 Therapist Intern registration had expired. At that time, Respondent gave R.A. a letter indicating
27 that she was going to provide services as a "wellness coach" and act as R.A.'s "mentor,
28 cheerleader, advisor, and counselor." However, Respondent did not clarify or distinguish to

1 R.A., her role as a life coach versus a Marriage and Family Therapist Intern. In addition,
2 Respondent continued to provide psychotherapy, not life coaching. For example, Respondent
3 regularly documented that she was assessing R.A. for dangerousness and also made diagnostic
4 observations – both indicators of provision of psychotherapeutic rather than life coaching
5 services. Respondent practiced psychotherapy without a license during the period that her
6 registration was expired.

7 18. Respondent failed to document treatment decisions in her records. In the instances
8 where Respondent documented treatment decisions, the documentation was well below the
9 standard of care. For example, Respondent poorly documented her decision to switch treatment
10 to coaching after she learned that her intern registration had lapsed. Respondent also failed to
11 maintain clinical records regarding her treatment of R.A. For the records that Respondent did
12 maintain, they failed to provide any of the necessary details of the treatment process, such as the
13 reasoning behind the excessively long treatment sessions, the use of alcohol during treatment
14 sessions or the reasoning behind sessions being held at R.A.'s or Respondent's home.

15 19. Respondent practiced outside the scope of her competence and failed to accurately
16 diagnose R.A.'s condition. Only late in the psychotherapy process, did Respondent make a
17 diagnoses of Post-Traumatic Stress Disorder and Borderline Personality Disorder. Respondent
18 should have been able to draw actual diagnostic conclusions much earlier and should have created
19 a treatment plan based on those diagnoses. Respondent also should have recognized that R.A.
20 needed psychotherapy treatment.

21 20. Respondent also continued to provide treatment to R.A. even though it was
22 reasonably clear that R.A. was not benefitting from the relationship. As a result of the treatment
23 she received from Respondent, R.A. was emotionally harmed.

24 **FIRST CAUSE FOR DISCIPLINE**

25 **(Unprofessional Conduct - Gross Negligence/Incompetence)**

26 21. Respondent is subject to disciplinary action under Code section 4982, subdivision (d),
27 for unprofessional conduct, in that she committed acts of gross negligence or incompetnce, as set
28

1 forth in paragraphs 12 through 20, which are incorporated herein. Specifically, Respondent was
2 grossly negligent or incompetent when she:

- 3 (a) Engaged in unethical dual relationships with R.A.;
- 4 (b) Offered services while under the influence of narcotics;
- 5 (c) Consumed alcohol during therapy sessions with R.A.;
- 6 (e) Made inappropriate self-disclosures to R.A. during the course of treatment;
- 7 (f) Allowed a role reversal to develop where R.A. became a psychotherapist to her;
- 8 (g) Accepted direct payment from R.A. for her MFT services;
- 9 (h) Practiced to create a dependency in R.A., rather than focusing to increase R.A.'s
10 autonomy;
- 11 (i) Used her professional relationship with R.A. to further her own interests;
- 12 (j) Inappropriately handled the transition to "wellness coach";
- 13 (k) Continued to provide psychotherapy to R.A. during the period when her registration was
14 expired;
- 15 (l) Failed to document treatment decisions in her records and failed to maintain clinical
16 records regarding her treatment of R.A.;
- 17 (m) Practiced outside the scope of her competence and failed to accurately diagnose R.A.'s
18 condition;
- 19 (n) Continued to provide treatment to R.A. even though it was reasonably clear that R.A.
20 was not benefitting from the relationship;
- 21 (l) Recklessly caused R.A. emotional harm.

22 SECOND CAUSE FOR DISCIPLINE

23 (Unprofessional Conduct – Use of Alcohol and Drugs)

24 22. Respondent is subject to disciplinary action under Code section 4982, subdivision (c),
25 for unprofessional conduct, in that during several treatment sessions with R.A., Respondent used
26 cocaine and/or alcohol to the extent or in a manner dangerous or injurious to herself or others, or
27 to the extent that it impaired her ability to practice safely, as set forth in paragraphs 12 through
28 20, which are incorporated herein.

1 THIRD CAUSE FOR DISCIPLINE

2 (Unprofessional Conduct – Recklessly Cause Emotional Harm)

3 23. Respondent is subject to disciplinary action under Code section 4982, subdivision (i),
4 for unprofessional conduct, in that Respondent recklessly caused emotional harm to R.A., as set
5 forth in paragraphs 12 through 20, which are incorporated herein.

6 FOURTH CAUSE FOR DISCIPLINE

7 (Unprofessional Conduct –Failed to Maintain Confidentiality)

8 24. Respondent is subject to disciplinary action under Code section 4982, subdivision
9 (m), for unprofessional conduct, in that Respondent failed to maintain confidentiality, as
10 evidenced by her disclosure to R.A. of her other patient who was a “50 year old virgin,” as set
11 forth in paragraphs 12 through 20, which are incorporated herein.

12 FIFTH CAUSE FOR DISCIPLINE

13 (Unprofessional Conduct – Performing Services Beyond Scope of Competence)

14 25. Respondent is subject to disciplinary action under Code section 4982, subdivision (s),
15 for unprofessional conduct, in that Respondent performed services beyond the scope of her
16 competence, as set forth in paragraphs 12 through 20, which are incorporated herein.

17 SIXTH CAUSE FOR DISCIPLINE

18 (Unprofessional Conduct – Violation of Statute)

19 26. Respondent is subject to disciplinary action under Code section 4982, subdivision (u),
20 for unprofessional conduct, in that Respondent violated Code section 4980.43, subdivisions (b)
21 and (h), by working as an independent contractor and accepting direct payment from R.A., as set
22 forth in paragraphs 12 through 20, which are incorporated herein.

23 SEVENTH CAUSE FOR DISCIPLINE

24 (Unprofessional Conduct – Failed to Keep Records Consistent with Clinical Judgment)

25 27. Respondent is subject to disciplinary action under Code section 4982, subdivision (v),
26 for unprofessional conduct, in that Respondent failed to keep records consistent with sound
27 clinical judgment, the standards of the profession, and the nature of the services being rendered,
28 as set forth in paragraphs 12 through 20, which are incorporated herein.

1 EIGHTH CAUSE FOR DISCIPLINE

2 (Unprofessional Conduct – Engaging in Practice without a License/Registration)

3 28. Respondent is subject to disciplinary action under Code section 4980, subdivision (b)
4 in that Respondent engaged in the practice of marriage and family therapy during a period when
5 her Marriage and Family Therapist Intern Registration was expired, as set forth in paragraphs 12
6 through 20, which are incorporated herein.

7 PRAYER

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

10 1. Revoking or suspending Marriage and Family Therapist Intern Registration Number
11 IMF65356, issued to Tanya Lynn Friedlinghaus;

12 2. Ordering Tanya Lynn Friedlinghaus to pay the Board of Behavioral Sciences the
13 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
14 Professions Code section 125.3;

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

16
17
18 DATED: November 25, 2014

Kim Madsen

19 KIM MADSEN
20 Executive Officer
21 Board of Behavioral Sciences
22 Department of Consumer Affairs
23 State of California
24 Complainant

25 SD2014707917
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