

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

In the Matter of the Accusation Against:

JAKE DAVID MYERS

5958 San Vicente Blvd. #2
Los Angeles, CA 90019

Marriage and Family Therapist Intern
Registration No. IMF 68676

Respondent.

Case No. 200-2014-000145

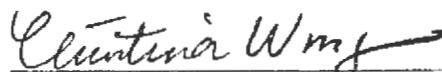
OAH No. 2015040730

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary 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 September 4, 2015.

It is so ORDERED August 5, 2015.



FOR THE BOARD OF BEHAVIORAL SCIENCES
DEPARTMENT OF CONSUMER AFFAIRS

1 KAMALA D. HARRIS
Attorney General of California
2 LINDA L. SUN
Supervising Deputy Attorney General
3 KATHERINE MESSANA
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Attorneys for Complainant

7
8 **BEFORE THE**
BOARD OF BEHAVIORAL SCIENCES
DEPARTMENT OF CONSUMER AFFAIRS
9 **STATE OF CALIFORNIA**

10 In the Matter of the Accusation Against:

Case No. 200-2014-000145

11 **JAKE DAVID MYERS**

OAH No. 2015040730

12 5958 San Vicente Blvd. #2
13 Los Angeles, CA 90019

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

14 Marriage and Family Therapist Intern
15 Registration No. IMF 68676

16 Respondent.

17
18 In the interest of a prompt and speedy settlement of this matter, consistent with the public
19 interest and the responsibility of the Board of Behavioral Sciences of the Department of
20 Consumer Affairs, the parties hereby agree to the following Stipulated Settlement and
21 Disciplinary Order which will be submitted to the Board for approval and adoption as the final
22 disposition of the Accusation.

23 **PARTIES**

24 1. Kim Madsen ("Complainant") is the Executive Officer of the Board of Behavioral
25 Sciences. She brought this action solely in her official capacity and is represented in this matter
26 by Kamala D. Harris, Attorney General of the State of California, by Katherine Messana, Deputy
27 Attorney General.

28 2. Respondent Jake David Myers (Respondent") is represented in this proceeding by

1 attorney John J. Duran, Esq., whose address is: Duran Law Group, 9000 Sunset Boulevard, #710,
2 West Hollywood, CA 90069.

3 3. On or about November 7, 2011, the Board of Behavioral Sciences issued Marriage
4 and Family Therapist Intern Registration No. IMF 68676 to Jake David Myers (Respondent).
5 The Marriage and Family Therapist Intern Registration was in full force and effect at all times
6 relevant to the charges brought in Accusation No. 200-2014-000145 and will expire on November
7 30, 2015, unless renewed.

8 JURISDICTION

9 4. Accusation No. 200-2014-000145 was filed before the Board of Behavioral Sciences
10 (Board), Department of Consumer Affairs, and is currently pending against Respondent. The
11 Accusation and all other statutorily required documents were properly served on Respondent on
12 March 17, 2015. Respondent timely filed his Notice of Defense contesting the Accusation.

13 5. A copy of Accusation No. 200-2014-000145 is attached as **Exhibit A** and
14 incorporated herein by reference.

15 ADVISEMENT AND WAIVERS

16 6. Respondent has carefully read, fully discussed with counsel, and understands the
17 charges and allegations in Accusation No. 200-2014-000145. Respondent has also carefully read,
18 fully discussed with counsel, and understands the effects of this Stipulated Settlement and
19 Disciplinary Order.

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

27 8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
28 every right set forth above.

1 CULPABILITY

2 9. Respondent admits the truth of each and every charge and allegation in Accusation
3 No. 200-2014-000145.

4 10. Respondent agrees that his Marriage and Family Therapist Intern Registration is
5 subject to discipline and he agrees to be bound by the Board's probationary terms as set forth in
6 the Disciplinary Order below.

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 settlement, without notice to or participation by Respondent or his counsel. By signing the
12 stipulation, Respondent understands and agrees that he may not withdraw his 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 Settlement 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 Settlement and Disciplinary Order, including Portable Document Format
20 (PDF) and facsimile signatures thereto, shall have the same force and effect as the originals.

21 13. This Stipulated Settlement and Disciplinary 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 Settlement and Disciplinary
25 Order may not be altered, amended, modified, supplemented, or otherwise changed except by a
26 writing 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

1 Disciplinary Order:

2 **DISCIPLINARY ORDER**

3 IT IS HEREBY ORDERED that Marriage and Family Therapist Intern Registration No.
4 IMF 68676 issued to Respondent Jake David Myers (Respondent) is revoked. However, the
5 revocation is stayed and Respondent is placed on probation for five (5) years on the following
6 terms and conditions. Probation shall continue on the same terms and conditions if Respondent is
7 granted a subsequent registration, becomes licensed, or is granted another registration or license
8 regulated by the Board during the probationary period.

9 1. **Psychotherapy**

10 Respondent shall participate in ongoing psychotherapy with a California licensed mental
11 health professional who has been approved by the Board. Within 15 days of the effective date of
12 this decision, respondent shall submit to the Board or its designee for its prior approval the name
13 and qualifications of one or more therapists of respondent's choice. Such therapist shall possess a
14 valid California license to practice and shall have had no prior business, professional, or personal
15 relationship with respondent, and shall not be the respondent's supervisor. Counseling shall be at
16 least once a week unless otherwise determined by the Board. Respondent shall continue in such
17 therapy at the Board's discretion. Cost of such therapy is to be borne by respondent.

18 Respondent may, after receiving the Board's written permission, receive therapy via
19 videoconferencing if respondent's good faith attempts to secure face-to-face counseling are
20 unsuccessful due to the unavailability of qualified mental health care professionals in the area.
21 The Board may require that respondent provide written documentation of his good faith attempts
22 to secure counseling via videoconferencing.

23 Respondent shall provide the therapist with a copy of the Board's decision no later than the
24 first counseling session. Upon approval by the Board, respondent shall undergo and continue
25 treatment until the Board or its designee determines that no further psychotherapy is necessary.

26 Respondent shall take all necessary steps to ensure that the treating psychotherapist submits
27 quarterly written reports to the Board concerning respondent's fitness to practice, progress in
28 treatment, and to provide such other information as may be required by the Board. Respondent

1 shall execute a Release of Information authorizing the therapist to divulge information to the
2 Board.

3 If the treating psychotherapist finds that respondent cannot practice safely or independently,
4 the psychotherapist shall notify the Board within three (3) working days. Upon notification by
5 the Board, respondent shall immediately cease practice and shall not resume practice until
6 notified by the Board or its designee that respondent may do so. Respondent shall not thereafter
7 engage in any practice for which a license issued by the Board is required until the Board or its
8 designee has notified respondent that he may resume practice. Respondent shall document
9 compliance with this condition in the manner required by the Board.

10 **2. Attend Dependency Support Program.** Respondent shall attend a dependency
11 support program approved by the Board no less than 2 times per week. Respondent shall provide
12 proof of attendance at said program with each quarterly report that Respondent submits during the
13 period of probation. Failure to attend, or to show proof of such attendance, shall constitute a
14 violation of probation.

15 **3. Relapse Prevention Program.** Within fifteen (15) days from the effective date of
16 the decision, Respondent shall submit to the Board or its designee for prior approval the name of
17 one or more program(s) for relapse prevention. Respondent shall enter a relapse prevention
18 program within fifteen (15) days after notification of the board's approval of such program.
19 Respondent shall successfully complete such treatment contract as may be recommended by the
20 program and approved by the Board or its designee. Respondent shall submit proof satisfactory
21 to the Board or its designee of compliance with this term of probation. Respondent shall sign a
22 release allowing the program to release to the Board all information the Board deems relevant.
23 The Respondent shall take all necessary steps to ensure that the relapse prevention program
24 submits quarterly written reports to the Board addressing the Respondent's treatment and
25 progress sin the program.

26 Components of the treatment contract shall be relevant to the violation and to the
27 respondent's current status in recovery or rehabilitation. The components may include, but are
28 not limited to: restrictions on practice and work setting, random biological fluid testing,

1 abstention from drugs and alcohol, use of worksite monitors, participation in chemical
2 dependency rehabilitation programs or groups, psychotherapy, counseling, psychiatric
3 evaluations, and other appropriate relapse prevention program(s). All costs of participating in the
4 program(s) shall be borne by Respondent.

5 **4. Abstain from Use of Alcohol / Submit to Biological Fluid Testing and Samples**

6 Respondent shall completely abstain from the use of alcoholic beverages during the period
7 of probation.

8 Respondent shall immediately submit to biological fluid testing, at respondent's cost, upon
9 request by the Board or its designee. The length of time and frequency will be determined by the
10 Board. There will be no confidentiality in test results. Any confirmed positive finding will be
11 immediately reported to the respondent's current employer and shall be a violation of probation.

12 **5. Abstain from Controlled Substances / Submit to Biological Fluid Testing and**
13 **Samples**

14 Respondent shall completely abstain from the use or possession of controlled or illegal
15 substances unless lawfully prescribed by a medical practitioner for a bona fide illness.

16 Respondent shall immediately submit to biological fluid testing, at respondent's cost, upon
17 request by the Board or its designee. The length of time and frequency will be determined by the
18 Board. There will be no confidentiality in test results. Any confirmed positive finding will be
19 immediately reported to respondent's current employer and shall be a violation of probation.

20 **6. Obey All Laws**

21 Respondent shall obey all federal, state and local laws, all statutes and regulations
22 governing the licensee, and remain in full compliance with any court ordered criminal probation,
23 payments and other orders. A full and detailed account of any and all violations of law shall be
24 reported by the respondent to the Board or its designee in writing within seventy-two (72) hours
25 of occurrence. To permit monitoring of compliance with this term, respondent shall submit
26 fingerprints through the Department of Justice and Federal Bureau of Investigation within 30 days
27 of the effective date of the decision, unless previously submitted as part of the licensure
28 application process. Respondent shall pay the cost associated with the fingerprint process.

1 **7. File Quarterly Reports**

2 Respondent shall submit quarterly reports, to the Board or its designee, as scheduled on the
3 “Quarterly Report Form” (rev. 01/12/01). Respondent shall state under penalty of perjury
4 whether he has been in compliance with all the conditions of probation. Notwithstanding any
5 provision for tolling of requirements of probation, during the cessation of practice respondent
6 shall continue to submit quarterly reports under penalty of perjury.

7 **8. Comply with Probation Program**

8 Respondent shall comply with the probation program established by the Board and
9 cooperate with representatives of the Board in its monitoring and investigation of the respondent's
10 compliance with the program.

11 **9. Interviews with the Board**

12 Respondent shall appear in person for interviews with the Board or its designee upon
13 request at various intervals and with reasonable notice.

14 **10. Failure to Practice**

15 In the event respondent stops practicing in California, respondent shall notify the Board or
16 its designee in writing within 30 calendar days prior to the dates of non-practice and return to
17 practice. Non-practice is defined as any period of time exceeding thirty calendar days in which
18 respondent is not engaging in any activities defined in Sections 4980.02, 4989.14, 4996.9, or
19 4999.20 of the Business and Professions Code. Any period of non-practice, as defined in this
20 condition, will not apply to the reduction of the probationary term and will relieve respondent of
21 the responsibility to comply with the probationary terms and conditions with the exception of this
22 condition and the following terms and conditions of probation: Obey All Laws; File Quarterly
23 Reports; Comply With Probation Program; Maintain Valid License/Registration; and Cost
24 Recovery. Respondent's license/registration shall be automatically cancelled if respondent's
25 period of non-practice total two years.

26 **11. Change of Place of Employment or Place of Residence**

27 Respondent shall notify the Board or its designee in writing within 30 days of any change
28 of place of employment or place of residence. The written notice shall include the address, the

1 telephone number and the date of the change.

2 **12. Supervision of Unlicensed Persons**

3 While on probation, respondent shall not act as a supervisor for any hours of supervised
4 practice required for any license issued by the Board. Respondent shall terminate any such
5 supervisory relationship in existence on the effective date of this Decision.

6 **13. Notification to Clients**

7 Respondent shall notify all clients when any term or condition of probation will affect their
8 therapy or the confidentiality of their records, including but not limited to supervised practice,
9 suspension, or client population restriction. Such notification shall be signed by each client prior
10 to continuing or commencing treatment. Respondent shall submit, upon request by the Board or
11 its designee, satisfactory evidence of compliance with this term of probation.

12 **14. Notification to Employer**

13 Respondent shall provide each of his current or future employers, when performing services
14 that fall within the scope of practice of his license, a copy of this Decision and the Statement of
15 Issues or Accusation before commencing employment. Notification to the respondent's current
16 employer shall occur no later than the effective date of the Decision or immediately upon
17 commencing employment. Respondent shall submit, upon request by the Board or its designee,
18 satisfactory evidence of compliance with this term of probation.

19 **15. Violation of Probation**

20 If respondent violates the conditions of his probation, the Board, after giving respondent
21 notice and the opportunity to be heard, may set aside the stay order and impose the discipline
22 (revocation/suspension) of respondent's registration provided in the decision.

23 If during the period of probation, an accusation, petition to revoke probation, or statement
24 of issues has been filed against respondent's registration or application for licensure, or the
25 Attorney General's office has been requested to prepare such an accusation, petition to revoke
26 probation, or statement of issues, the probation period set forth in this decision shall be
27 automatically extended and shall not expire until the accusation, petition to revoke probation, or
28 statement of issues has been acted upon by the board. Upon successful completion of probation,

1 respondent's registration shall be fully restored.

2 **16. Maintain Valid License/Registration**

3 Respondent shall, at all times while on probation, maintain a current and active
4 registration/license with the Board, including any period during which suspension or probation is
5 tolled. Should respondent's registration/license, by operation of law or otherwise, expire, upon
6 renewal respondent's registration/license shall be subject to any and all terms of this probation
7 not previously satisfied.

8 **17. Registration/License Surrender**

9 Following the effective date of this decision, if respondent ceases practicing due to
10 retirement or health reasons, or is otherwise unable to satisfy the terms and conditions of
11 probation, respondent may voluntarily request the surrender of his registration/license to the
12 Board. The Board reserves the right to evaluate the respondent's request and to exercise its
13 discretion whether to grant the request or to take any other action deemed appropriate and
14 reasonable under the circumstances. Upon formal acceptance of the surrender, respondent shall
15 within 30 calendar days deliver respondent's registration/license and certificate and if applicable
16 wall certificate to the Board or its designee and respondent shall no longer engage in any practice
17 for which a registration/license is required. Upon formal acceptance of the tendered
18 registration/license, respondent will no longer be subject to the terms and conditions of probation.

19 Voluntary surrender of respondent's registration/license shall be considered to be a
20 disciplinary action and shall become a part of respondent's registration/license history with the
21 Board. Respondent may not petition the Board for reinstatement of the surrendered
22 registration/license. Should respondent at any time after voluntary surrender ever reapply to the
23 Board for licensure respondent must meet all current requirements for licensure including, but not
24 limited to, filing a current application, meeting all current educational and experience
25 requirements, and taking and passing any and all examinations required of new applicants.

26 **18. Instruction of Coursework Qualifying for Continuing Education**

27 Respondent shall not be an instructor of any coursework for continuing education credit
28 required by any license issued by the Board.

1 **19. Notification to Referral Services**

2 Respondent shall immediately send a copy of this decision to all referral services registered
3 with the Board in which respondent is a participant. While on probation, respondent shall send a
4 copy of this decision to all referral services registered with the Board that respondent seeks to
5 join.

6 **20. Reimbursement of Probation Program**

7 Respondent shall reimburse the Board for the costs it incurs in monitoring the probation to
8 ensure compliance for the duration of the probation period. Reimbursement costs shall be
9 \$1,200.00 per year.

10 **21. Cost Recovery**

11 Respondent shall pay the Board \$1,712.50 as and for the reasonable costs of the
12 investigation and prosecution of Case No. 200-2014-000145. Respondent shall make such
13 payments pursuant to a payment plan outlined by the Board. Respondent shall make the check or
14 money order payable to the Board of Behavioral Sciences and shall indicate on the check or
15 money order that it is the cost recovery payment for Case No. 200-2014-000145. Any order for
16 payment of cost recovery shall remain in effect whether or not probation is tolled. Probation shall
17 not terminate until full payment has been made. Should any part of cost recovery not be paid in
18 accordance with the outlined payment schedule, respondent shall be considered to be in violation
19 of probation. A period of non-practice by respondent shall not relieve respondent of his
20 obligation to reimburse the board for its costs.

21 Cost recovery must be completed six months prior to the termination of probation. A
22 payment plan authorized by the Board may be extended at the discretion of the Enforcement
23 Manager based on good cause shown by the probationer.

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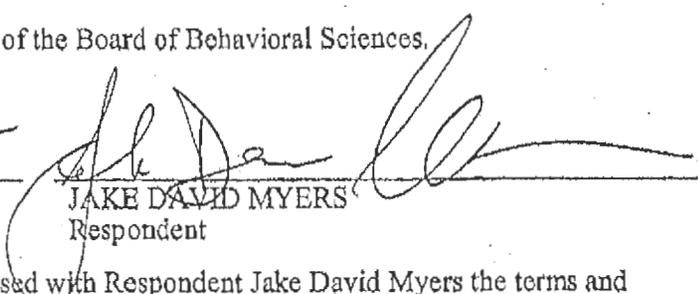
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1 ACCEPTANCE

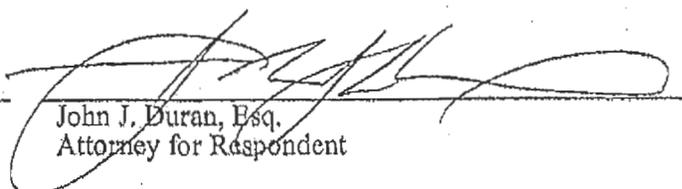
2 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully
3 discussed it with my attorney, John J. Duran, Esq. I understand the stipulation and the effect it
4 will have on my Marriage and Family Therapist Intern Registration. I enter into this Stipulated
5 Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be
6 bound by the Decision and Order of the Board of Behavioral Sciences.

7
8 DATED: June 10, 2015


9 JAKE DAVID MYERS
Respondent

10 I have read and fully discussed with Respondent Jake David Myers the terms and
11 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.
12 I approve its form and content.

13
14 DATED: 6/10/15


15 John J. Duran, Esq.
16 Attorney for Respondent

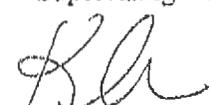
17 ENDORSEMENT

18 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
19 submitted for consideration by the Board of Behavioral Sciences.

20
21 Dated: 6/11/15

Respectfully submitted,

22 KAMALA D. HARRIS
Attorney General of California
23 LINDA L. SUN
Supervising Deputy Attorney General

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25 
26 KATHERINE MESSANA
Deputy Attorney General
27 Attorneys for Complainant

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Exhibit A

Accusation No. 200-2014-000145

1 KAMALA D. HARRIS
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2 THOMAS L. RINALDI
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7 *Attorneys for Complainant*

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:

Case No. 200-2014-000145

13 **JAKE DAVID MYERS**

14 5958 San Vicente Blvd. #2
Los Angeles, CA 90019

ACCUSATION

15 Marriage and Family Therapist Intern
Registration No. IMF 68676

16 Respondent.

17
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 7, 2011, the Board of Behavioral Sciences (Board) issued
23 Marriage and Family Therapist Intern Registration No. IMF 68676 to Jake David Myers
24 (Respondent). The Marriage and Family Therapist Intern Registration was in full force and effect
25 at all times relevant to the charges brought herein and will expire on November 30, 2015, unless
26 renewed.

27 **JURISDICTION AND STATUTORY PROVISIONS**

28 3. This Accusation is brought before the Board of Behavioral Sciences (Board),

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

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

7 5. Section 4982 of the Code states in pertinent part:

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

12 (a) The conviction of a crime substantially related to the qualifications,
13 functions, or duties of a licensee or registrant under this chapter. The record of
14 conviction shall be conclusive evidence only of the fact that the conviction occurred.
15 The board may inquire into the circumstances surrounding the commission of the
16 crime in order to fix the degree of discipline or to determine if the conviction is
17 substantially related to the qualifications, functions, or duties of a licensee or
18 registrant under this chapter. A plea or verdict of guilty or a conviction following a
19 plea of nolo contendere made to a charge substantially related to the qualifications,
20 functions, or duties of a licensee or registrant under this chapter shall be deemed to be
21 a conviction within the meaning of this section. The board may order any license or
22 registration suspended or revoked, or may decline to issue a license or registration
23 when the time for appeal has elapsed, or the judgment of conviction has been affirmed
24 on appeal, or, when an order granting probation is made suspending the imposition of
25 sentence, irrespective of a subsequent order under Section 1203.4 of the Penal Code
26 allowing the person to withdraw a plea of guilty and enter a plea of not guilty, or
27 setting aside the verdict of guilty, or dismissing the accusation, information, or
28 indictment.

...

21 (c) Administering to himself or herself any controlled substance or using
22 of any of the dangerous drugs specified in Section 4022, or of any alcoholic beverage
23 to the extent, or in a manner, as to be dangerous or injurious to the person applying
24 for a registration or license or holding a registration or license under this chapter, or to
25 any other person, or to the public, or, to the extent that the use impairs the ability of
26 the person applying for or holding a registration or license to conduct with safety to
27 the public the practice authorized by the registration or license. The board shall deny
28 an application for a registration or license or revoke the license or registration of any
29 person, other than one who is licensed as a physician and surgeon, who uses or offers
30 to use drugs in the course of performing marriage and family therapy services.

...

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

1 in that Respondent was convicted of a crime substantially related to the qualifications, functions,
2 and duties of a marriage and family therapist intern. Specifically, on or about May 17, 2013,
3 Respondent was convicted of one misdemeanor count of violating Georgia Code, title 40, section
4 40-6-391, subdivision (a)(1) [driving under the influence of alcohol] in the criminal proceeding
5 entitled *The People of the State of Georgia v. Jake David Myers* (Super. Ct. Chatham County,
6 2013, No. 2012-08-3481-01). The court placed Respondent on probation for 12 months, with
7 terms and conditions. The circumstances underlying the conviction are that on or about August
8 25, 2012, during a traffic enforcement stop, Chatham County Sheriff's Department officers
9 detected a strong odor of an alcoholic beverage emitting from Respondent's person. Respondent
10 failed to adequately perform the standard Field Sobriety Tests and admitted to drinking prior to
11 driving. Respondent submitted to a breath test that resulted in a breath-alcohol content level of
12 0.125 grams on the first reading and 0.133 grams on the second reading.

13 **SECOND CAUSE FOR DISCIPLINE**

14 **(Dangerous Use of Alcohol)**

15 10. Respondent is subject to disciplinary action under section 4982, subdivision (c) of the
16 Code in that Respondent used alcoholic beverages to the extent, or in a manner dangerous or
17 injurious to himself, others and the public. The conduct is described in more particularity in
18 paragraph 9 above, inclusive and hereby incorporated by reference.

19 **THIRD CAUSE FOR DISCIPLINE**

20 **(Violation of Marriage and Family Therapist Act)**

21 10. Respondent is subject to disciplinary action under section 4982, subdivision (e) of the
22 Code in that Respondent violated provisions of the Marriage and Family Therapist Act. The
23 violations are described in more particularity in paragraphs 9-10 above, inclusive and hereby
24 incorporated by reference.

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PRAAYER

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

1. Revoking or suspending Marriage and Family Therapist Intern Registration Number IMF 68676, issued to Jake David Myers;

2. Ordering Jake David Myers to pay the Board of Behavioral Sciences the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

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

DATED: March 2, 2015



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

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