

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

In the Matter of the Accusation Against:

**BONNIE LYNN FRIEDMAN**  
**AKA BONNIE L. FRIEDMAN**  
**301 Crescent Court, #3118**  
**San Francisco, CA 94134**

**Licensed Clinical Social Worker License No.**  
**LCSW 24172**

Respondent.

Case No. LC-2014-241

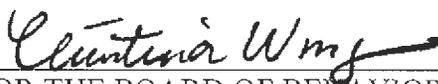
OAH No. 2015020309

**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 August 27, 2015.

It is so ORDERED July 28, 2015.

  
\_\_\_\_\_  
FOR THE BOARD OF BEHAVIORAL SCIENCES  
DEPARTMENT OF CONSUMER AFFAIRS

1 KAMALA D. HARRIS  
Attorney General of California  
2 DIANN SOKOLOFF  
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*Attorneys for Complainant*

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

11 In the Matter of the Accusation Against:

Case No. LC-2014-241

OAH No. 2015020309

12  
13 **BONNIE LYNN FRIEDMAN**  
**AKA BONNIE L. FRIEDMAN**  
14 **301 Crescent Court, #3118**  
15 **San Francisco, CA 94134**

**STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER**

16 **Licensed Clinical Social Worker License No.**  
17 **LCSW 24172**

18 Respondent.

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

22 PARTIES

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



1 CULPABILITY

2 9. Respondent admits the truth of each and every charge and allegation in Accusation  
3 No. LC-2014-241.

4 10. Respondent agrees that her Licensed Clinical Social Worker License is subject to  
5 discipline and she agrees to be bound by the Board's probationary terms as set forth in the  
6 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 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 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 PDF and facsimile  
20 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.



1 quarterly written reports to the Board concerning Respondent's fitness to practice, progress in  
2 treatment, and to provide such other information as may be required by the Board. Respondent  
3 shall execute a Release of Information authorizing the therapist to divulge information to the  
4 Board.

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

12 **2. 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 **3. Abstain from Use of Alcohol / Submit to Biological Fluid Testing and Samples**

21 Respondent shall completely abstain from the use of alcoholic beverages during the period  
22 of probation.

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

27 **4. Attend Dependency Support Program**

28 Respondent shall attend a dependency support program approved by the Board no less than

1 two times per week. Respondent shall provide proof of attendance at said program with each  
2 quarterly report that Respondent submits during the period of probation. Failure to attend, or to  
3 show proof of such attendance, shall constitute a violation of probation.

4 **5. Obey All Laws**

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

13 **6. File Quarterly Reports**

14 Respondent shall submit quarterly reports, to the Board or its designee, as scheduled on the  
15 "Quarterly Report Form" (rev. 01/12/01). Respondent shall state under penalty of perjury  
16 whether she has been in compliance with all the conditions of probation. Notwithstanding any  
17 provision for tolling of requirements of probation, during the cessation of practice Respondent  
18 shall continue to submit quarterly reports under penalty of perjury.

19 **7. Comply with Probation Program**

20 Respondent shall comply with the probation program established by the Board and  
21 cooperate with representatives of the Board in its monitoring and investigation of the  
22 Respondent's compliance with the program.

23 **8. Interviews with the Board**

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

26 **9. Failure to Practice**

27 In the event Respondent stops practicing in California, Respondent shall notify the Board or  
28 its designee in writing within 30 calendar days prior to the dates of non-practice and return to

1 practice. Non-practice is defined as any period of time exceeding thirty calendar days in which  
2 Respondent is not engaging in any activities defined in Sections 4980.02, 4989.14, 4996.9, or  
3 4999.20 of the Business and Professions Code. Any period of non-practice, as defined in this  
4 condition, will not apply to the reduction of the probationary term and will relieve Respondent of  
5 the responsibility to comply with the probationary terms and conditions with the exception of this  
6 condition and the following terms and conditions of probation: Obey All Laws; File Quarterly  
7 Reports; Comply With Probation Program; Maintain Valid License; and Cost Recovery.  
8 Respondent's license shall be automatically cancelled if Respondent's period of non-practice total  
9 two years.

10 **10. Change of Place of Employment or Place of Residence**

11 Respondent shall notify the Board or its designee in writing within 30 days of any change  
12 of place of employment or place of residence. The written notice shall include the address, the  
13 telephone number and the date of the change.

14 **11. Supervision of Unlicensed Persons**

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

18 **12. Notification to Clients**

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

24 **13. Notification to Employer**

25 Respondent shall provide each of her current or future employers, when performing  
26 services that fall within the scope of practice of her license, a copy of this Decision and the  
27 Statement of Issues or Accusation before commencing employment. Notification to the  
28 Respondent's current employer shall occur no later than the effective date of the Decision or

1 immediately upon commencing employment. Respondent shall submit, upon request by the  
2 Board or its designee, satisfactory evidence of compliance with this term of probation.

3 **14. Violation of Probation**

4 If Respondent violates the conditions of her probation, the Board, after giving Respondent  
5 notice and the opportunity to be heard, may set aside the stay order and impose the discipline  
6 (revocation/suspension) of Respondent's license provided in the decision.

7 If during the period of probation, an accusation, petition to revoke probation, or statement  
8 of issues has been filed against Respondent's license or application for licensure, or the Attorney  
9 General's office has been requested to prepare such an accusation, petition to revoke probation, or  
10 statement of issues, the probation period set forth in this decision shall be automatically extended  
11 and shall not expire until the accusation, petition to revoke probation, or statement of issues has  
12 been acted upon by the board. Upon successful completion of probation, Respondent's license  
13 shall be fully restored.

14 **15. Maintain Valid License**

15 Respondent shall, at all times while on probation, maintain a current and active license with  
16 the Board, including any period during which suspension or probation is tolled. Should  
17 Respondent's license, by operation of law or otherwise, expire, upon renewal Respondent's  
18 license shall be subject to any and all terms of this probation not previously satisfied.

19 **16. License Surrender**

20 Following the effective date of this decision, if Respondent ceases practicing due to  
21 retirement or health reasons, or is otherwise unable to satisfy the terms and conditions of  
22 probation, Respondent may voluntarily request the surrender of her license to the Board. The  
23 Board reserves the right to evaluate the Respondent's request and to exercise its discretion  
24 whether to grant the request or to take any other action deemed appropriate and reasonable under  
25 the circumstances. Upon formal acceptance of the surrender, Respondent shall within 30 calendar  
26 days deliver Respondent's license and certificate and if applicable wall certificate to the Board or  
27 its designee and Respondent shall no longer engage in any practice for which a license is  
28 required. Upon formal acceptance of the tendered license, Respondent will no longer be subject

1 to the terms and conditions of probation.

2 Voluntary surrender of Respondent's license shall be considered to be a disciplinary action  
3 and shall become a part of Respondent's license history with the Board. Respondent may not  
4 petition the Board for reinstatement of the surrendered license. Should Respondent at any time  
5 after voluntary surrender ever reapply to the Board for licensure Respondent must meet all  
6 current requirements for licensure including, but not limited to, filing a current application,  
7 meeting all current educational and experience requirements, and taking and passing any and all  
8 examinations required of new applicants.

9 **17. Instruction of Coursework Qualifying for Continuing Education**

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

12 **18. Notification to Referral Services**

13 Respondent shall immediately send a copy of this decision to all referral services registered  
14 with the Board in which Respondent is a participant. While on probation, Respondent shall send  
15 a copy of this decision to all referral services registered with the Board that Respondent seeks to  
16 join.

17 **19. Reimbursement of Probation Program**

18 Respondent shall reimburse the Board for the costs it incurs in monitoring the probation to  
19 ensure compliance for the duration of the probation period. Reimbursement costs shall be  
20 \$1,200.00 per year.

21 **20. Cost Recovery**

22 Respondent shall pay the Board \$1,865.00 as and for the reasonable costs of the  
23 investigation and prosecution of Case No. LC-2014-241. Respondent shall make such payments  
24 pursuant to a payment plan outlined by the Board. Respondent shall make the check or money  
25 order payable to the Board of Behavioral Sciences and shall indicate on the check or money order  
26 that it is the cost recovery payment for Case No. LC-2014-241. Any order for payment of cost  
27 recovery shall remain in effect whether or not probation is tolled. Probation shall not terminate  
28 until full payment has been made. Should any part of cost recovery not be paid in accordance

1 with the outlined payment schedule, Respondent shall be considered to be in violation of  
 2 probation. A period of non-practice by Respondent shall not relieve Respondent of her obligation  
 3 to reimburse the board for its costs.

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

7 ACCEPTANCE

8 I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully  
 9 discussed it with my attorney, Lucy S. McAllister. I understand the stipulation and the effect it  
 10 will have on my Licensed Clinical Social Worker License. I enter into this Stipulated Settlement  
 11 and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the  
 12 Decision and Order of the Board of Behavioral Sciences.

13  
 14 DATED:

5/8/2015 Bonnie Lynn Friedman  
 BONNIE LYNN FRIEDMAN  
 Respondent

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1 I have read and fully discussed with Respondent Bonnie Lynn Friedman the terms and  
2 conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order.  
3 I approve its form and content.

4 DATED: 5/08/2015

  
\_\_\_\_\_  
LUCY S. MCALLISTER  
Attorney for Respondent

6  
7 ENDORSEMENT

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

10 Dated:

Respectfully submitted,

11 KAMALA D. HARRIS  
Attorney General of California  
12 DIANN SOKOLOFF  
Supervising Deputy Attorney General

13   
14 SHEILA J. VASANTHARAM  
15 Deputy Attorney General  
16 *Attorneys for Complainant*

17  
18 SF2014902534  
19 90507892.doc

**Exhibit A**

**Accusation No. LC-2014-241**

1 KAMALA D. HARRIS  
Attorney General of California  
2 DIANN SOKOLOFF  
Supervising Deputy Attorney General  
3 SHEILA J. VASANTHARAM  
Deputy Attorney General  
4 State Bar No. 289217  
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Oakland, CA 94612-0550  
6 Telephone: (510) 622-2141  
Facsimile: (510) 622-2270  
7 E-mail: Sheila.Vasantharam@doj.ca.gov  
*Attorneys for Complainant*

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10 **DEPARTMENT OF CONSUMER AFFAIRS**  
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11 In the Matter of the Accusation Against:

Case No. LC-2014-241

12 **BONNIE LYNN FRIEDMAN**  
13 **A.K.A. BONNIE L. FRIEDMAN**  
14 **301 Crescent Court, #3118**  
**San Francisco, CA 94134**

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

15 **Licensed Clinical Social Worker License No.**  
16 **LCSW 24172**

17 Respondent.

18 Complainant alleges:

19 **PARTIES**

20 1. Kim Madsen (Complainant) brings this Accusation solely in her official capacity as the  
21 Executive Officer of the Board of Behavioral Sciences, Department of Consumer Affairs.

22 2. On or about September 30, 2007, the Board of Behavioral Sciences issued Licensed  
23 Clinical Social Worker License No. LCSW 24172 to Bonnie Lynn Friedman, also known as Bonnie  
24 L. Friedman (Respondent). The Licensed Clinical Social Worker License was in full force and effect  
25 at all times relevant to the charges brought in this Accusation and will expire on August 31, 2015,  
26 unless renewed.

27 ///

1 JURISDICTION

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

5 4. Section 4996.11 of the Code states that "[t]he board may suspend or revoke the license of  
6 any person who is guilty on the grounds set forth in Section 4992.3. The proceedings for the  
7 suspension or revocation of licenses under this article shall be conducted in accordance with Chapter  
8 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code, and  
9 the board shall have all the powers granted in that chapter."

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

14 STATUTORY AND REGULATORY PROVISIONS

15 6. Section 4992.3 of the Code states, in pertinent part:

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

19 "(a) The conviction of a crime substantially related to the qualifications, functions, or duties of  
20 a licensee or registrant under this chapter [the Clinical Social Worker Practice Act (Bus. & Prof.  
21 Code, 4991, et seq.)]. The record of conviction shall be conclusive evidence only of the fact that the  
22 conviction occurred. The board may inquire into the circumstances surrounding the commission of  
23 the crime in order to fix the degree of discipline or to determine if the conviction is substantially  
24 related to the qualifications, functions, or duties of a licensee or registrant under this chapter. A plea  
25 or verdict of guilty or a conviction following a plea of nolo contendere made to a charge substantially  
26 related to the qualifications, functions, or duties of a licensee or registrant under this chapter is a  
27 conviction within the meaning of this section. The board may order any license or registration  
28 suspended or revoked, or may decline to issue a license or registration when the time for appeal has

1 elapsed, or the judgment of conviction has been affirmed on appeal, or, when an order granting  
2 probation is made suspending the imposition of sentence, irrespective of a subsequent order under  
3 Section 1203.4 of the Penal Code allowing the person to withdraw a plea of guilty and enter a plea of  
4 not guilty, or setting aside the verdict of guilty, or dismissing the accusation, information, or  
5 indictment.

6 . . .

7 "(c) Administering to himself or herself any controlled substance or using any of the dangerous  
8 drugs specified in Section 4022 or any alcoholic beverage to the extent, or in a manner, as to be  
9 dangerous or injurious to the person applying for a registration or license or holding a registration or  
10 license under this chapter, or to any other person, or to the public, or, to the extent that the use  
11 impairs the ability of the person applying for or holding a registration or license to conduct with  
12 safety to the public the practice authorized by the registration or license. The board shall deny an  
13 application for a registration or license or revoke the license or registration of any person who uses or  
14 offers to use drugs in the course of performing clinical social work. This provision does not apply to  
15 any person also licensed as a physician and surgeon under Chapter 5 (commencing with Section  
16 2000) or the Osteopathic Act who lawfully prescribes drugs to a patient under his or her care."

17 **COST RECOVERY PROVISION**

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

22 **FACTUAL BACKGROUND**

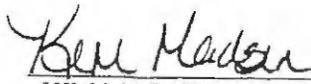
23 8. On or about July 26, 2013, in *People v. Bonnie L. Friedman*, Case No. 7011XEX, in the  
24 County Court of the Eleventh Judicial Circuit for Miami-Dade County, Florida, Respondent entered a  
25 plea of nolo contendere and was convicted of reckless driving (Fl. Stat., § 316.192, subd. (1)(A)).  
26 Respondent was ordered to complete a DUI Level One Course, a victim impact panel, and 100 hours  
27 of community service. Respondent completed the DUI Level One Course on December 27, 2012.  
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3. Taking such other and further action as deemed necessary and proper.

DATED: September 17, 2014



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

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