




STATE OF ARIZONA  
BOARD OF BEHAVIORAL HEALTH EXAMINERS  
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DOUGLAS A. DUCEY  
Governor

TOBI ZAVALA  
Executive Director

June 23, 2015

Ms. Bambi Denton  


Dear Ms. Denton:

On June 4, 2015, the Board reviewed your application for licensure as an associate counselor and determined that you are not eligible for licensure pursuant to A.R.S. § 32-3275(6). Specifically, the Board found that you engaged in conduct that had you been licensed would have constituted grounds for disciplinary action. The Board determined that the disciplinary action invoked the following violations that were based upon the conduct referenced thereafter:

1. A.R.S § 32-3251(12)(l), any conduct, practice or condition that impairs the ability of the licensee to safely and competently practice the licensee's profession.
2. A.R.S § 32-3251(12)(y), engaging in a dual relationship with a client that could impair the licensee's objectivity or professional judgment or create a risk of harm to the client.
3. A.R.S § 32-3251(12)(b), use of fraud or deceit in connection with rendering services as a licensee or in establishing qualifications for licensure.
4. A.R.S § 32-3251(12)(h), obtaining a fee by fraud, deceit or misrepresentation.
5. A.R.S § 32-3251(12)(q), failing or refusing to maintain adequate records of behavioral health services provided to a client.

These violations were based on the following findings:

1. You were employed with a behavioral health agency from 2007-2013.
2. You were practicing psychotherapy as an unlicensed individual.
3. You accepted payment from unauthorized private practice clients for behavioral health services.
4. You failed to document behavioral health services you provided to private practice clients.
5. You provided behavioral health services that were not congruent with your education, training, or experience.
6. You failed to gather additional information, complete a suicide risk assessment, or create a safety plan for a client who disclosed a previous attempted suicide and suicidal ideation.
7. You traded behavioral health services with a client for psychic readings that the client provided.
8. When asked by your Clinical Director if you were treating private practice clients, you indicated you were not, which was deceitful.

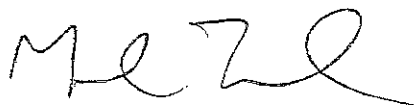
Per A.R.S. §41.1092.03.B, you may request a Formal Hearing by notifying the agency in writing within thirty-five (35) days from the date of this letter. If you do request a Formal Hearing, you also have the

right, pursuant to A.R.S. §41-1092.06, to request a settlement conference. If you do not request a Formal Hearing by the close of business on July 27, 2015, your file will be closed without further recourse to appeal and the licensure denial will be reported to the federal data banks that record this information. If you desire licensure at a later date, you must submit a new application and fee.

PLEASE BE FURTHER ADVISED that, pursuant to the Board's new licensure statute, as of July 1, 2004, only persons holding licenses to practice professional counseling may do so unless they are exempt from licensure pursuant to A.R.S. §32-3271.

If you have any questions, I can be reached at (602) 542-1617.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tobi Zavala', written in a cursive style.

Tobi Zavala  
Executive Director