

1                                   **BEFORE THE BOARD OF PSYCHOLOGIST EXAMINERS**  
2                                   **FOR THE STATE OF ARIZONA**

3   IN THE MATTER OF:

Case No: RFI 15-39

4   **DEBORAH HUGHES, Psy.D.**

**INTERIM FINDINGS OF FACT,  
CONCLUSIONS OF LAW; AND  
ORDER FOR SUMMARY  
SUSPENSION OF LICENSE**

5   Holder of License No. 4381  
6   for the Practice of Psychology  
7   in the State of Arizona,

8           Respondent.

9  
10   **To: Deborah Hughes, Psy.D.**  
11       **11417 East Rafael Avenue**  
12       **Mesa, Arizona 85212**

13       **Deborah Hughes, Psy.D.**  
14       **11041 E. Weir Ave.**  
15       **Mesa, AZ 85208**

16           This matter came before the Arizona State Board of Psychologist Examiners  
17   (“Board”) on November 6, 2015, at the Board’s meeting location at 1400 West  
18   Washington Street, Suite 240, Phoenix, Arizona at which time the Board convened  
19   and considered the possible summary suspension of Deborah Hughes’ (“Respondent”) license to practice psychology in the State of Arizona. Respondent was properly noticed and appeared personally and through her attorney, David G. Derickson.

20                                   **INTERIM FINDINGS OF FACT**

21           1.     Respondent is a licensed psychologist in the State of Arizona, license  
22   number 4381. She has been licensed in Arizona since March of 2013.

23           2.     Respondent was employed as a Clinician by the Youth Development  
24   Institute (“YDI”) from April of 2013, to September 17, 2015.

25           3.     C.K., a 17 year old male, was an inpatient client at YDI in Phoenix, AZ  
26   at all relevant times.

1           4.     During his stay at YDI, C.K. was a patient of and received treatment  
2 and counseling services from Respondent.

3           5.     Over several months, approximately May of 2015 through September of  
4 2015, Respondent engaged in conduct with C.K. that lead to YDI terminating her  
5 employment due to “extremely poor boundaries with clients.” That conduct included:

6           a.     On or about June 29, 2015, staff observed Respondent holding  
7 C.K.’s tennis shoes and to be playing a game of “keep away” and  
8 engaging in “horseplay activities” with C.K.

9           b.     As part of his treatment regimen, C.K. was given a polygraph  
10 examination on September 16, 2015, and during the course of that  
11 examination, C.K. disclosed the following:

12           i.     During a counseling session with Respondent, Respondent  
13 consoled him with a hug, and he kissed her on her cheek.  
14 Respondent then told C.K. he “can’t do that.” He had been  
15 crying and he laid his head on Respondent’s chest area near  
16 her upper breast. Respondent comforted him and did not  
17 move his head away.

18           ii.    Additionally, during another session with Respondent  
19 during which he was crying heavily, she had him place his  
20 head on her lap near her knees during which she stroked his  
21 hair. His head was in her lap for approximately 5 minutes.  
22 The next day Respondent told C.K. that “it was getting  
23 really steamy” when he had his head on her lap.

24           c.     C.K. also indicated that Respondent had shared very personal  
25 information with him relating to her sexual experiences, including her  
26 sexual preferences and preferred sexual positions, as well as the names

1 and genders of various sexual partners and the fact that she was sexually  
2 abused when she was younger.

3 d. According to C.K., Respondent often discussed with him her  
4 personal and relationship problems.

5 e. Respondent also reported to C.K. that her current partner, and  
6 father of her child, was her former client while she worked as a  
7 psychologist in Hawaii and that she got pregnant while she was working  
8 with him. She also offered that she was forced to resign from the  
9 position because of inappropriate boundaries with clients.

10 f. According to C.K., Respondent asked C.K. if he had ever  
11 masturbated to images of her; she admitted to C.K. that she had  
12 masturbated while thinking of him.

13 g. According to C.K., Respondent told C.K. that she couldn't wait  
14 until he turned the age of 18 so that they could "hook up" and have sex.

15 h. Respondent allowed C.K. to walk her to her car after work and  
16 spent an increasing amount of time with him outside of therapeutic  
17 sessions.

18 i. C.K. provided YDI personnel with 4 letters Respondent had  
19 written to him after C.K. was removed from Respondent's caseload and  
20 Respondent was directed to stay away from him. The following are  
21 excerpts from Respondent's letters to C.K. Respondent wrote:

22 i. "I was very happy to be able to talk with you yesterday. I  
23 very much miss that."

24 ii. "So I stayed up late last night watching *The Longest Ride*.  
25 It was great and I saw you written all over it. It's hard not  
26 seeing you but almost harder when I do because I hold my

1 breath and just try to keep doing whatever I was, like it's  
2 no big deal."

3 iii. "I figure it's a waste of paper to explain the last thing that  
4 happened here that I got in trouble for because it's the  
5 same old thing. I'm not supposed to have any physical  
6 contact with you or talk to you. The threat of losing my  
7 job is really the only thing that keeps me in check."

8 iv. "All I need to know from you is what you want and that is  
9 what I wanted to know. I thanked you for the other day  
10 because you did exactly what I hoped for when I asked  
11 you your thoughts, you said exactly what you thought  
12 which I love about you."

13 v. "I'm not going to address what you wrote about leaving  
14 AZ or I hope we can talk at some point about that. I also  
15 hope you will give me some time with you first."

16 vi. "I very much miss having you in the house. I miss being  
17 able to talk to you, not that I ever felt like we had enough  
18 time but some was better than this."

19 vii. "I ended up talking to my therapist about this (her  
20 relationship with C.K.) because I told YDI I would she  
21 asked me why I was attracted to you. I said because of  
22 your intelligence, insightfulness, and the fact that you  
23 challenge me."

24 viii. "Sometimes I think I really must be crazy to be doing this  
25 or even thinking about it. I wonder why I am risking so  
26 much and what I come up with is that there is something

1 there and I can't let it go or I will regret it if I don't find  
2 out. There is too much feeling for me to ignore."

3 ix. "I want to thank you for your good boundaries. I get so  
4 frustrated sometimes at keeping away that I want to say  
5 f\$%# it. Strangely you maintaining your distance helps me  
6 do the same."

7 x. "Please be very careful with these (letters), honestly I  
8 would prefer if you got rid of these after you read it, I  
9 don't want it on YDI property."

10 xi. "On Monday when you came in the house and left I was  
11 completely distracted for the next hour or so. I felt so bad  
12 for who I was with as I could not maintain attention well  
13 at all. I tell myself it is temporary but it seems like a long  
14 temporary. You have said a couple of times that you  
15 would call on your birthday I hope that does not  
16 change...I have no good reasons to approach you or none  
17 that others would think of as 'good'. I figure I have next to  
18 no chances left so I need to be extra good."

19 xii. "In all honesty in being around you I have realized some  
20 things I want in a relationship and have not been getting  
21 so it has been getting harder over the last couple months."

22 xiii. "There are things I want to find out. Lots of things I want  
23 to find out but for starters what it tastes like to kiss you,  
24 what it feels like to have you against me, what it feels like  
25 to have you touch me, what it feels like...."

26

1 j. C.K. reported to another therapist that Respondent's disclosure of  
2 personal information to him made him feel uncomfortable and that the  
3 sexual talk with her had felt "f\$%#ing weird" and made him feel  
4 awkward.

5 k. C.K. also reported that he felt "coerced" by Respondent and that  
6 he didn't want to tell on Respondent because he feared she could  
7 retaliate against him and "hold up his case" and make him stay longer at  
8 YDI.

9 l. On at least three occasions during her employment with YDI,  
10 there were Infraction/Incident Reports filed relating to Respondent and  
11 her interaction with C.K. and other YDI clients. Specifically,

12 i. On June 9, 2015, an YDI employee noted that he perceived  
13 Respondent and C.K. to have a "very interesting"  
14 client/therapist relationship and that the client spends an  
15 "unnecessarily excessive amount of time with her  
16 (Respondent)." He noted that C.K. walks Respondent to her  
17 car and that the behavior between Respondent and C.K. is  
18 "almost flirtatious" and is "somewhat uncomfortable to see"  
19 and has been "ongoing."

20 ii. On July 2, 2015, another YDI employee said she observed  
21 Respondent was wearing shorts and playing basketball with  
22 a number of clients and that a number of the clients were  
23 "on the ground and [Respondent] was very much in the  
24 middle of it or so it seemed....they appeared to be wrestling  
25 over the basketball."  
26

1           iii.    On July 21, 2015, it was reported that C.K. was sitting on a  
2                   picnic bench talking to Respondent when it was observed  
3                   that she began rubbing her shoe against his and vice versa.  
4                   This exchange was characterized by witnesses as “playing  
5                   footsie.”

6           m.    Throughout her employment with YDI, Respondent received  
7                   supervision and counseling from her supervisors relating to boundaries  
8                   with clients. Specifically,

9                   i.    01/21/14 Respondent participated in supervision with the  
10                   Journey Clinical Director addressing the policies regarding  
11                   confidentiality and professional boundaries and contact with  
12                   former clients.

13                   ii.   05/01/14 Respondent again participated in supervision  
14                   addressing concerns that had arisen regarding her attempts  
15                   to contact a former client who had been detained.

16                   iii.   06/11/15 During this supervision with the Journey Clinical  
17                   Director, Respondent was counseled about specific  
18                   boundary concerns relating to clients C.K. and K.L. She  
19                   was told, again, that she should not be having small groups  
20                   in her office with clients during their chore time or  
21                   recreational therapy time. Due to specific concerns about  
22                   boundaries with C.K., he was reassigned to a different  
23                   therapist; it was also discussed that Respondent should have  
24                   minimal contact with C.K. and any contact should be only  
25                   in public places. Respondent received additional  
26                   supervision to help her identify areas where she struggles

1 with professional boundaries and strategies for developing  
2 healthy boundaries.

3 iv. 07/07/15 Respondent participated in supervision with the  
4 Executive Clinical Director of YDI regarding her ongoing  
5 boundary issues such as playing basketball, a contact sport,  
6 with her clients. During this supervision session,  
7 Respondent noted that she had received similar feedback at  
8 her previous place of employment. It was noted that up to  
9 this point Respondent had been resistant to the supervision  
10 she has received prior to YDI and at YDI regarding her poor  
11 boundaries with clients. Despite having reassigned C.K. to  
12 another therapist, Respondent continued to have contact  
13 with him that made co-workers uncomfortable and  
14 suspicious.

15 n. On 07/21/15 Respondent was placed on a corrective action plan  
16 regarding professional boundaries specifically prohibiting contact with  
17 C.K.

18 6. On August 24, 2015, Respondent was reassigned to an office across the  
19 hall from the Clinical Director where Respondent could be more closely monitored.

20 7. On September 16, 2015, Respondent was terminated from her position  
21 with YDI due to "extremely poor boundaries with clients."

22 **INTERIM CONCLUSIONS OF LAW**

23 The Board has personal and subject matter jurisdiction in this case under  
24 A.R.S. § 32-2061 *et seq.*, and is authorized to summarily suspend any license based  
25 on emergent conditions and circumstances under A.R.S. § 32-2081(I).  
26





1 DATED this 9<sup>th</sup> day of November, 2015. 5:00pm

2  
3 ARIZONA STATE BOARD OF  
PSYCHOLOGIST EXAMINERS

4  
5 

6 Dr. Cindy Olvey  
Executive Director, Arizona State Board of  
7 Psychologist Examiners

8 ORIGINAL filed  
9 this 9<sup>th</sup> day of November, 2015 to:

10 Arizona State Board of  
Psychologist Examiners  
11 1400 W. Washington, Suite 235  
Phoenix, Arizona 85007

12 COPY of the foregoing mailed  
13 By Certified Mail No. 70092250 0001 7373 0268  
14 this 10<sup>th</sup> day of November, 2015 to:

15 Deborah Hughes, Psy.D.  
11417 East Rafael Avenue  
16 Mesa, Arizona 85212  
Respondent

17 Deborah Hughes, Psy.D.  
11041 E. Weir Ave.  
18 Mesa, AZ 85208  
Respondent

19 COPY of the foregoing mailed this  
20 10<sup>th</sup> day of November, 2015 to:

21 David G. Derickson  
DERICKSON LAW OFFICES  
22 Two North Central, Suite 1600  
Phoenix, AZ 85004

23 Jeanne M. Galvin  
24 Assistant Attorney General  
1275 W. Washington Street SGD/LES  
25 Phoenix, Arizona 85007  
Attorney for the State of Arizona

1 MARK BRNOVICH  
2 Attorney General  
2 Firm State Bar No. 14000

3 JEANNE M. GALVIN  
4 Assistant Attorney General  
4 1275 W. Washington  
5 Phoenix, Arizona 85007-2997  
5 State Bar No. 015072  
6 Telephone: (602) 542-7983  
6 Fax: (602) 364-3202  
7 Attorneys for the Arizona Board of Psychologist Examiners

8 **E-mail Address for the Office of Administrative Hearings Use Only:**  
9 [LicensingEnforcement@azag.gov](mailto:LicensingEnforcement@azag.gov)

10 **BEFORE THE ARIZONA BOARD OF PSYCHOLOGIST EXMINERS**  
11 **IN THE OFFICE OF ADMINISTRATIVE HEARINGS**

12 In the Matter of :

13 **DEBORAH HUGHES, PSY.D.,**

14 Holder of License No. 4381,  
15 For the Practice of Psychology,  
16 In the State of Arizona,

17 Respondent.  
18

Case No.: 16F-1539-PSY

**FINDINGS OF FACT, CONCLUSIONS  
OF LAW, AND CONSENT  
AGREEMENT FOR THE VOLUNTARY  
SURRENDER OF PSYCHOLOGIST  
LICENSE**

19  
20 On October 15, 2015, the Arizona Board of Psychologist Examiners opened RFI No. 15-39  
21 against Deborah Hughes, Psy.D. ("Respondent"), alleging, *inter alia*, that she committed  
22 unprofessional conduct in her relationship with a young male client (C.K.). Specifically, the Board  
23 alleged that she provided services that were unnecessary or unsafe or otherwise engaged in activities  
24 as a psychologist that are unprofessional by current standards and violated certain ethical standards  
relating to sexual harassment, multiple relationships and exploitative relationships.

25 Having reviewed the allegations in the Request for Investigation, the Interim Findings of  
26 Fact, Conclusions of Law and Order for Summary Suspension of License and subsequent Complaint  
27 and Notice of Hearing and further considering the expense she would incur addressing the allegations  
at formal hearing and her plans for the future, Respondent concluded that she would offer to

1 surrender her license effective immediately and cease the practice of psychology in the State of  
2 Arizona.

3 In the interest of a prompt and judicious settlement of the above-captioned matter before the  
4 Board and consistent with public interest, statutory requirements and responsibilities of the Board,  
5 and pursuant to A.R.S. § 32-2061 *et seq.* and A.R.S. § 41-1092.07(F)(5), Respondent, holder of  
6 License No. 4381 for the practice of psychology in the State of Arizona and the Board to enter into  
7 this Consent Agreement for Voluntary Surrender (“Consent Agreement”) as the final disposition of  
8 this matter.

### 9 JURISDICTION

10  
11 1. The Board is authorized to regulate the practice of psychology in Arizona pursuant to  
12 A.R.S. §32-2061, *et seq.*, and the rules promulgated thereunder, found in Arizona Administrative  
13 Code (“A.A.C.” or “rules) at R4-26-101 *et seq.*

14 2. Respondent is the holder of License No. 4381 for the practice of psychology in the  
15 State of Arizona.

16  
17 3. The Board has personal and subject matter jurisdiction over Respondent pursuant to  
18 A.R.S. §32-2061, *et seq.*

### 19 CONSENT AGREEMENT

20 Respondent understands and agrees that:

21 4. The Board and Respondent enter into this Consent Agreement to promptly and  
22 judiciously resolve this matter, consistent with the public interest and the statutory requirements of  
23 the Board.

24  
25 5. The Board has jurisdiction over Respondent and the subject matter pursuant to A.R.S.  
26 § 32-2061, *et seq.*

1           6.       Respondent has the right to consult with an attorney prior to entering into this Consent  
2 Agreement.

3           7.       Respondent has a right to a public hearing concerning this case. She further  
4 acknowledges that at such formal hearing she could present evidence and cross-examine witnesses.  
5 Respondent irrevocably waives any right to such a hearing.

6           8.       Respondent irrevocably waives any right to rehearing or review or to any judicial  
7 review or any other appeal of this matter.  
8

9           9.       The Consent Agreement shall be subject to approval by the Board and shall be  
10 effective only when signed by the Executive Director and accepted by the Board. In the event that the  
11 Board does not approve this Consent Agreement, it is withdrawn and shall be of no evidentiary value  
12 and shall not be relied upon nor introduced in any action by any party, expect that the parties agree  
13 that should the Board reject this Consent Agreement and this case proceeds to hearing, Respondent  
14 shall assert no claim that the Board was prejudiced by its review and discussion of this document or  
15 any other records relating thereto.  
16

17           10.      The Consent Agreement, once approved by the Board and signed by the Executive  
18 Director, shall constitute a public record which may be disseminated as a formal action of the Board  
19 and shall be reported to the National Practitioner Data Bank.

20           With respect to the following Findings of Fact, Respondent denies the Findings of Fact as set  
21 forth below but does acknowledge that if this matter proceeded to a formal hearing, the State would  
22 offer evidence in support of the Findings of Fact from which a trier of fact could determine there is  
23 sufficient evidence to support the findings as alleged.  
24

25 ///

26 ///

27 ///

**FINDINGS OF FACT**

1  
2           1.       Respondent is a licensed psychologist in the State of Arizona, license number  
3 4381. She has been licensed in Arizona since March of 2013, however, her license to practice  
4 psychology was summarily suspended on November 9, 2015.

5           2.       On or about September 22, 2105, the Co-Executive Director at The Youth  
6 Development Institute (“YDI”) faxed to the Board an “Incident Report Form” detailing  
7 events that occurred at YDI involving Respondent.

8           3.       Based upon the information contained in the Incident Report, on October 15,  
9 2015, Cindy Olvey, Psy.D., the Board’s Executive Director, filed a Request for Investigation  
10 (“RFI”) against Respondent. The RFI alleged, among other things, that Respondent’s conduct  
11 with one of her clients (C.K.) included inappropriate physical contact, sexualized  
12 conversations, Respondent’s disclosure of intimate personal information to the client, and  
13 Respondent writing letters to the client that were very personal in nature. Despite having  
14 received professional supervision several times relating to appropriate professional  
15 boundaries, her conduct continued and YDI terminated Respondent following a pattern of  
16 “extremely poor professional boundaries.”

17           4.       On November 6, 2015, the Board met to consider the RFI filed against  
18 Respondent and the possible summary suspension of her license. Respondent was properly  
19 noticed and appeared through counsel. At the conclusion of its consideration of all the  
20 evidence and argument presented that day, the Board voted to summarily suspend  
21 Respondent’s license for the practice of psychology in the State of Arizona.

22           5.       As part of the investigation into the RFI, the Board obtained various documents  
23 and records from YDI and the Phoenix Police Department.

24           6.       Respondent was employed as a Clinician by the Youth Development Institute  
25 (“YDI”) from April of 2013, to September 17, 2015.  
26  
27

1           7.     YDI provides services including Level I residential treatment and group homes  
2 to youth referred for the treatment of serious emotional and/or behavioral disorders.

3           8.     As a clinician, Respondent treated clients between the ages of 11 and 18 with  
4 primary sexual behavior problems and mental health/substance abuse issues. Her job duties  
5 included conducting counseling with the youth and their families, while incorporating “Best  
6 Practice Standards for Juveniles with sexual behavior problems.”

7           9.     C.K., then a 17 year old male, was an inpatient client at YDI in Phoenix, AZ at  
8 all relevant times.

9           10.    During his stay at YDI, C.K. was a client of and received treatment and  
10 counseling services from Respondent.

11           11.    Over several months, approximately May of 2015, through September of 2015,  
12 Respondent engaged in conduct with C.K. that led to YDI terminating her employment due to  
13 “extremely poor boundaries with clients.”

14           12.    As part of his treatment regimen, C.K. was given a “maintenance polygraph  
15 examination” on September 16, 2015, and during the course of that examination, C.K.  
16 disclosed that he had inappropriate physical contact with Respondent. C.K. also disclosed  
17 that Respondent had shared very personal and intimate information with him about her life,  
18 relationship problems and sexual history.

19           13.    C.K. provided YDI personnel with 5 letters Respondent had written to him after  
20 he was removed from Respondent’s caseload and Respondent was directed to stay away from  
21 him. The letters contained inappropriate statements and sentiments from a psychologist to a  
22 patient, many with sexual connotations.

23           14.    C.K. reported to another therapist that Respondent’s disclosure of personal  
24 information to him made him feel uncomfortable and that the sexual talk with her made him  
25 feel awkward and “coerced” but he did not want to report Respondent because he feared she  
26 could retaliate against him and “hold up his case” and make him stay longer at YDI.  
27





1 American Psychological Association, as adopted by the Board in A.A.C. R4-26-301 and as  
2 set forth in Ethical Standard 3.02 Sexual Harassment, Ethical Standard 3.05 relating to  
3 Multiple Relationships, and 3.08 Exploitative Relationships.

4  
5 **ORDER**

6 Based upon the foregoing Findings of Fact and Conclusions of Law, the parties agree to the  
7 provisions and penalties imposed as follows:

8 1. **Upon the effective date of this Consent Agreement for Voluntary Surrender, the**  
9 **Respondent's license (#4381) for the practice of psychology in the State of Arizona shall be**  
10 **surrendered.** Once the surrender is effectuated, Respondent **shall not practice psychology in the**  
11 **State of Arizona or hold herself out as a licensed psychologist in the State of Arizona.** The  
12 effective date of this Consent Agreement for Voluntary Surrender is the date the Consent Agreement  
13 for Voluntary Surrender is accepted by the Board as evidenced by the signature of the Board's  
14 Executive Director.

15  
16 2. Respondent has read and understands this Consent Agreement for Voluntary  
17 Surrender as set forth herein, and has had the opportunity to discuss this Consent Agreement for  
18 Voluntary Surrender with an attorney or has waived the opportunity to discuss this Consent  
19 Agreement for Voluntary Surrender for the purpose of avoiding the expense and uncertainty of an  
20 administrative hearing.

21  
22 3. Respondent understands that she has the right to a public administrative hearing  
23 concerning each and every allegation set forth in the above-captioned matter, at which administrative  
24 hearing she could present evidence and cross-examine witnesses. By entering into this Consent  
25 Agreement for Voluntary Surrender, Respondent freely and voluntarily relinquishes all rights to such  
26 administrative hearing, as well as all rights of rehearing, review, reconsideration, appeal, judicial  
27

1 review or any other administrative and/or judicial action, concerning the matters set forth herein.  
2 Respondent affirmatively agrees that this Consent Agreement for Voluntary Surrender shall be  
3 irrevocable.

4 4. Respondent understands that this Consent Agreement for Voluntary Surrender, or any  
5 part thereof, may be considered in any future disciplinary action against her or in any future decision  
6 regarding re-licensure.

7 5. The parties agree that this Consent Agreement for Voluntary Surrender does not  
8 constitute a dismissal or resolution of other matters currently pending before the Board, if any, and  
9 does not constitute any waiver, expressed or implied, of the Board's statutory authority or jurisdiction  
10 regarding any other pending or future investigation, action or proceeding. Respondent also  
11 understands that acceptance of the Consent Agreement for Voluntary Surrender does not preclude any  
12 other agency, subdivision or officer of this state from instituting other civil or criminal proceedings  
13 with respect to the conduct that is subject of this Consent Agreement for Voluntary Surrender.

14 6. Respondent understands that the foregoing Consent Agreement for Voluntary  
15 Surrender shall not become effective unless and until adopted by the Board and executed on behalf of  
16 the Board. Any modification to this original document is ineffective and void unless mutually  
17 approved by both parties in writing.

18 7. Respondent understands that this Consent Agreement for Voluntary Surrender is a  
19 public record and may be publicly disseminated as a formal action of the Board and shall be reported  
20 to the National Practitioner Data Bank.

21 DATED THIS 2<sup>nd</sup> day of May, 2016.  
22  
23  
24  
25  
26  
27

1 Deborah Hughes  
2 Deborah Hughes  
3 Respondent

Cindy Olvey  
Cindy Olvey, Psy.D.  
Executive Director  
ARIZONA BOARD OF  
PSYCHOLOGIST EXAMINERS

4 **ORIGINAL** of the foregoing filed  
5 this 2<sup>nd</sup> day of May, 2016 with:

6 The Board of Psychologist Examiners  
7 1400 W. Washington Street, Suite 240  
8 Phoenix, AZ 85007

9 **COPY** of the foregoing mailed by certified mail  
10 this 2<sup>nd</sup> day of May, 2016 to:

11 Deborah Hughes  
12 Address of Record

13 **COPY** of the foregoing mailed  
14 this 2<sup>nd</sup> day of May, 2016 to:

15 David G. Derickson  
16 DERICKSON LAW OFFICES  
17 Two North Central, Suite 1600  
18 Phoenix, AZ 85004

19 **COPY** of the foregoing sent or delivered  
20 this 2<sup>nd</sup> day of May, 2016 to:

21 Jeanne M. Galvin  
22 Assistant Attorney General SGD/LES  
23 Arizona Attorney General's Office  
24 1275 W. Washington St.  
25 Phoenix, AZ 85007

26 By: Karen Poe  
27 JMG/ah #5009718