

DV-109

Notice of Court Hearing

Clerk stamps date here when form is filed.

FILED
Clerk of the Superior Court

OCT 15 2018

R. Diaz de Leon

Fill in court name and street address:

Superior Court of California, County of

SAN DIEGO SUPERIOR COURT
FAMILY COURT
1100 UNION STREET
SAN DIEGO, CA 92101

Clerk fills in case

Case Number

18FDV04704C

801: RODRIGUEZ, LISA

1 Name of Person Asking for Order:

Your lawyer in this case (if you have one):

Name: George Gedulin State Bar No.: 277660

Firm Name: Law Office of George Gedulin

Address (If you have a lawyer for this case, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, give a different mailing address instead. You do not have to give your telephone, fax, or e-mail.):

Address: 12636 High Bluff Drive, Suite 400

City: San Diego State: CA Zip: 92130

Telephone: 858-333-5231 Fax: 858-519-5671

E-Mail Address: george@gedulinlaw.com

2 Name of Person to Be Restrained:

Jeffrey D. Lovin

The court will fill out the rest of this form.

3 Notice of Court Hearing

A court hearing is scheduled on the request for restraining orders against the person in ②.

Hearing
Date

→ Date: 10/30/18 Time: 8:30 AM
Dept.: 801 Room: 8th Floor

Name and address of court if different from above:

4 Temporary Restraining Orders (any orders granted are attached on Form DV-110)

a. Temporary restraining orders for personal conduct, stay away, and protection of animals, as requested in Form DV-100, *Request for Domestic Violence Restraining Order*, are:

- (1) ☒ **All granted** until the court hearing
(2) ☐ All **denied** until the court hearing (specify reasons for denial in (b)):
(3) ☐ Partly **granted** and partly **denied** until the court hearing (specify reasons for denial in (b)):

b. Requested temporary restraining orders for personal conduct, stay away, and protection of animals are denied because:

- (1) ☐ The facts as stated in form DV-100 do not show reasonable proof of a past act or acts of abuse. (Family Code, §§ 6320 and 6320.5)
(2) ☐ The facts do not describe in sufficient detail the most recent incidents of abuse, such as what happened, the dates, who did what to whom, or any injuries or history of abuse.
(3) ☐ Further explanation of reason for denial, or reason not listed above:

This is a Court Order.

Notice of Court Hearing
(Domestic Violence Prevention)

Case Number:

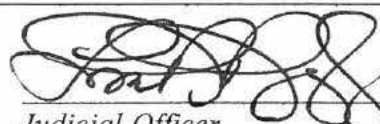
18FDV04704C
801: RODRIGUEZ, LISA

5 Service of Documents and Time for Service—for Person in 1

At least ☒ five or ☐ ___ days before the hearing, someone age 18 or older—not you or anyone else to be protected—must personally give (serve) a court's file-stamped copy of this form (DV-109, *Notice of Court Hearing*) to the person in 2 along with a copy of all the forms indicated below:

- a. Form DV-100, *Request for Domestic Violence Restraining Order*, (file-stamped) with applicable attachments
- b. ☒ Form DV-110, *Temporary Restraining Order* (file-stamped) with applicable attachments **if granted by the judge**
- c. Form DV-120, *Response to Request for Domestic Violence Restraining Order* (blank form)
- d. Form DV-250, *Proof of Service by Mail* (blank form)
- e. ☐ Other (specify): _____

Date: 10/15/18


Judicial Officer
Lisa R. Rodriguez

Right to Cancel Hearing: Information for the Person in 1

- If item 4(a)(2) or 4(a)(3) is checked, the judge has denied some or all of the temporary orders you requested until the court hearing. The judge may make the orders you want after the court hearing. You can keep the hearing date, or you can cancel your request for orders so there is no court hearing.
- If you want to cancel the hearing, use Form DV-112, *Waiver of Hearing on Denied Request for Temporary Restraining Order*. Fill it out and file it with the court as soon as possible. You may file a new request for orders, on the same or different facts, at a later time.
- If you cancel the hearing, do not serve the documents listed in item 5 on the other person.
- If you want to keep the hearing date, you must have all of the documents listed in item 5 served on the other person within the time listed in item 5.
- At the hearing, the judge will consider whether denial of any requested orders will jeopardize your safety and the safety of children for whom you are requesting custody or visitation.
- You must come to the hearing if you want the judge to make restraining orders or continue any orders already made. If you cancel the hearing or do not come to the hearing, any restraining orders made on Form DV-110 will end on the date of the hearing.

To the Person in 1

- The court cannot make the restraining orders after the court hearing unless the person in 2 has been personally given (served) a copy of your request and any temporary orders. To show that the person in 2 has been served, the person who served the forms must fill out a proof of service form. Form DV-200, *Proof of Personal Service* may be used.
- For information about service, read Form DV-210-INFO, *What Is "Proof of Personal Service"?*
- If you are unable to serve the person in 2 in time, you may ask for more time to serve the documents. Read Form DV-115-INFO, *How to Ask for a New Hearing Date*.

This is a Court Order.

Case Number:

18FDV04704C
801: RODRIGUEZ, LISA

To the Person in ②

- If you want to respond in writing, mail a copy of your completed Form DV-120, *Response to Request for Domestic Violence Restraining Order*, to the person in ① and file it with the court. You cannot mail Form DV-120 yourself. Someone age 18 or older—**not you**—must do it.
- To show that the person in ① has been served by mail, the person who mailed the forms must fill out a proof of service form. Form DV-250, *Proof of Service by Mail*, may be used. File the completed form with the court before the hearing and bring it with you to the hearing.
- For information about responding to a restraining order and filing your answer, read Form DV-120-INFO, *How Can I Respond to a Request for Domestic Violence Restraining Order?*
- Whether or not you respond in writing, go to the court hearing if you want the judge to hear from you before making orders. You may tell the judge why you agree or disagree with the orders requested. You may bring witnesses and other evidence.
- At the hearing, the judge may make restraining orders against you that could last up to five years.
- The judge may also make other orders about your children, child support, spousal support, money, and property and may order you to turn in or sell any firearms that you own or possess.



Request for Accommodations

Assistive listening systems, computer-assisted real-time captioning, or sign language interpreter services are available if you ask at least five days before the hearing. Contact the clerk's office or go to www.courts.ca.gov/forms for *Request for Accommodations by Persons With Disabilities and Response* (Form MC-410). (Civil Code, § 54.8.)

(Clerk will fill out this part.)

—Clerk's Certificate—

I certify that this *Notice of Court Hearing* is a true and correct copy of the original on file in the court.

Date: 15 OCT 2018

Clerk, by

, Deputy

R. Diaz de Leon



This is a Court Order.

DV-110**Temporary Restraining Order**

Person in ① must complete items ①, ②, and ③ only.

① Name of Protected Person:

Your lawyer in this case (if you have one):

Name: George Gedulin State Bar No.: 277660Firm Name: Law Office of George Gedulin

Address (If you have a lawyer for this case, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, give a different mailing address instead. You do not have to give your telephone, fax, or e-mail.):

Address: 12636 High Bluff Drive, Suite 400City: San Diego State: CA Zip: 92130Telephone: 858-333-5231 Fax: 858-519-5671E-mail Address: george@gedulinlaw.com**② Name of Restrained Person:**Jeffrey D. Lovin

Description of restrained person:

Sex: ☒ M ☐ F Height: 6' Weight: 180 Hair Color: BROWN Eye Color: BROWN
 Race: White Age: 60 Date of Birth: 2/17/1958
 Address (if known): 14043 Durango Drive
 City: Del Mar State: CA Zip: 92014
 Relationship to protected person: Used to date

③ ☒ Additional Protected Persons

In addition to the person named in ①, the following persons are protected by temporary orders as indicated in items ⑥ and ⑦ (family or household members):

Full name	Relationship to person in ①	Sex	Age
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

☐ Check here if there are additional protected persons. List them on an attached sheet of paper and write, "DV-110, Additional Protected Persons" as a title.

The court will complete the rest of this form.

④ Court Hearing

This order expires at the end of the hearing stated below:

Hearing Date: 10/30/18 Time: 8:30 ☒ a.m. ☐ p.m. Def.

This is a Court Order.

Clerk stamps date here when form is filed.

FILED

Clerk of the Superior Court

OCT 15 2018**R. Diaz de Leon**

Fill in court name and street address:

Superior Court of California, County of

SAN DIEGO SUPERIOR COURT
FAMILY COURT
1100 UNION STREET
SAN DIEGO, CA 92101

Court fills in case

18FDV04704C**801: RODRIGUEZ, LISA**

Case Number:

Case Number: _____

18FDV04704C
801: RODRIGUEZ, LISA**5** ☐ **Criminal Protective Order**

- a. ☐ A criminal protective order on Form CR-160, *Criminal Protective Order—Domestic Violence*, is in effect.
Case Number: _____ County: _____ Expiration Date: _____
- b. ☒ No information has been provided to the judge about a criminal protective order.

To the person in 2

The court has granted the temporary orders checked below. If you do not obey these orders, you can be arrested and charged with a crime. You may be sent to jail for up to one year, pay a fine of up to \$1,000, or both.

6 **Personal Conduct Orders** ☐ Not requested ☐ Denied until the hearing ☒ **Granted as follows:**

- a. You must **not** do the following things to the person in ① and ☐ persons in ③:
- ☒ Harass, attack, strike, threaten, assault (*sexually or otherwise*), hit, follow, stalk, molest, destroy personal property, disturb the peace, keep under surveillance, impersonate (*on the Internet, electronically or otherwise*), or block movements
 - ☒ Contact, either directly or indirectly, in any way, including but not limited to, by telephone, mail, e-mail or other electronic means
 - ☒ Take any action, directly or through others, to obtain the addresses or locations of the persons in ① and ③.
(If this item is not checked, the court has found good cause not to make this order.)
- b. Peaceful written contact through a lawyer or process server or another person for service of Form DV-120 (*Response to Request for Domestic Violence Restraining Order*) or other legal papers related to a court case is allowed and does not violate this order.
- c. ☐ Exceptions: Brief and peaceful contact with the person in ①, and peaceful contact with children in ③, as required for court-ordered visitation of children, is allowed unless a criminal protective order says otherwise.

7 **Stay-Away Order** ☐ Not requested ☐ Denied until the hearing ☒ **Granted as follows:**

- a. You **must** stay at least (*specify*): 100 yards away from (*check all that apply*):
- ☒ The person in ① ☐ School of person in ①
 - ☒ Home of person in ① ☒ The persons in ③
 - ☒ The job or workplace of person in ① ☐ The child(ren)'s school or child care
 - ☒ Vehicle of person in ① ☐ Other (*specify*): _____
- b. ☐ Exceptions: Brief and peaceful contact with the person in ①, and peaceful contact with children in ③, as required for court-ordered visitation of children, is allowed unless a criminal protective order says otherwise.

8 **Move-Out Order** ☒ Not requested ☐ Denied until the hearing ☐ **Granted as follows:**

You must take only personal clothing and belongings needed until the hearing and move out immediately from (*address*): _____

This is a Court Order.

Case Number:

18FDV04704C
801: RODRIGUEZ, LISA**9 No Guns or Other Firearms or Ammunition**

- a. You cannot own, possess, have, buy or try to buy, receive or try to receive, or in any other way get guns, other firearms, or ammunition.
- b. You must:
- Sell to, or store with, a licensed gun dealer, or turn in to a law enforcement agency, any guns or other firearms within your immediate possession or control. Do so within 24 hours of being served with this order.
 - Within 48 hours of receiving this order, file with the court a receipt that proves guns have been turned in, stored, or sold. (You may use Form DV-800, Proof of Firearms Turned In, Sold, or Stored, for the receipt.) Bring a court filed copy to the hearing.
- c. ☐ The court has received information that you own or possess a firearm.

10 Record Unlawful Communications☐ Not requested ☐ Denied until the hearing ☒ Granted as follows:

The person in (1) can record communications made by you that violate the judge's orders.

11 Care of Animals ☒ Not requested ☐ Denied until the hearing ☐ Granted as follows:

The person in (1) is given the sole possession, care, and control of the animals listed below. The person in (2) must stay at least _____ yards away from and not take, sell, transfer, encumber, conceal, molest, attack, strike, threaten, harm, or otherwise dispose of the following animals:

12 Child Custody and Visitation ☒ Not requested ☐ Denied until the hearing ☐ Granted as follows:

Child custody and visitation are ordered on the attached Form DV-140, *Child Custody and Visitation Order* or (specify other form): _____. The parent with temporary custody of the child must not remove the child from California unless the court allows it after a noticed hearing (Fam. Code, § 3063).

13 Child Support

Not ordered now but may be ordered after a noticed hearing.

14 Property Control ☒ Not requested ☐ Denied until the hearing ☐ Granted as follows:Until the hearing, *only* the person in (1) can use, control, and possess the following property:**15 Debt Payment** ☒ Not requested ☐ Denied until the hearing ☐ Granted as follows:

The person in (2) must make these payments until this order ends:

Pay to: _____ For: _____ Amount: \$ _____ Due date: _____

Pay to: _____ For: _____ Amount: \$ _____ Due date: _____

16 Property Restraint ☒ Not requested ☐ Denied until the hearing ☐ Granted as follows:

If the people in (1) and (2) are married to each other or are registered domestic partners, ☐ the person in (1) ☐ the person in (2) must not transfer, borrow against, sell, hide, or get rid of or destroy any property, including animals, except in the usual course of business or for necessities of life. In addition, each person must notify the other of any new or big expenses and explain them to the court. (The person in (2) cannot contact the person in (1) if the court has made a "no contact" order.)

Peaceful written contact through a lawyer or a process server or other person for service of legal papers related to a court case is allowed and does not violate this order.

This is a Court Order.

Case Number:

17 Spousal Support

Not ordered now but may be ordered after a noticed hearing.

18 Rights to Mobile Device and Wireless Phone Account**a. Property control of mobile device and wireless phone account**☒ Not requested ☐ Denied until the hearing ☐ Granted as follows:

Until the hearing, only the person in ① can use, control, and possess the following property:

Mobile device (*describe*) _____ and account (*phone number*): _____Mobile device (*describe*) _____ and account (*phone number*): _____Mobile device (*describe*) _____ and account (*phone number*): _____☐ Check here if you need more space. Attach a sheet of paper and write "DV-110 Rights to Mobile Device and Wireless Phone Account" as a title.**b. Debt Payment** ☒ Not requested ☐ Denied until the hearing ☐ Granted as follows:

The person in ② must make these payments until this order ends:

Pay to (*wireless service provider*): _____ Amount: \$ _____ Due date: _____**c. Transfer of Wireless Phone Account**

Not ordered now but may be ordered after a noticed hearing.

19 Insurance☐ The person in ① ☐ the person in ② is ordered NOT to cash, borrow against, cancel, transfer, dispose of, or change the beneficiaries of any insurance or coverage held for the benefit of the parties, or their child(ren), if any, for whom support may be ordered, or both.**20 Lawyer's Fees and Costs**

Not ordered now but may be ordered after a noticed hearing.

21 Payments for Costs and Services

Not ordered now but may be ordered after a noticed hearing.

22 Batterer Intervention Program

Not ordered now but may be ordered after a noticed hearing.

23 Other Orders ☐ Not requested ☐ Denied until the hearing ☒ Granted as follows:~~I request that I not be contacted by any third parties on behalf of the respondent other than by a licensed attorney, hired to represent him in this matter.~~☐ Check here if there are additional orders. List them on an attached sheet of paper and write "DV-110, Other Orders" as a title.**24 No Fee to Serve (Notify) Restrained Person**

If the sheriff serves this order, he or she will do so for free.

Date: 10/15/18

Judge (or Judicial Officer)

Lisa R. Rodriguez

This is a Court Order.

Case Number

Warnings and Notices to the Restrained Person in ②**If You Do Not Obey This Order, You Can Be Arrested And Charged With a Crime.**

- If you do not obey this order, you can go to jail or prison and/or pay a fine.
- It is a felony to take or hide a child in violation of this order.
- If you travel to another state or to tribal lands or make the protected person do so, with the intention of disobeying this order, you can be charged with a federal crime.

You Cannot Have Guns, Firearms, And/Or Ammunition.

You cannot own, have, possess, buy or try to buy, receive or try to receive, or otherwise get guns, other firearms, and/or ammunition while the order is in effect. If you do, you can go to jail and pay a \$1,000 fine. You must sell to or store with a licensed gun dealer or turn in to a law enforcement agency any guns or other firearms that you have or control. The judge will ask you for proof that you did so. If you do not obey this order, you can be charged with a crime. Federal law says you cannot have guns or ammunition while the order is in effect.

Service of Order by Mail

If the judge makes a restraining order at the hearing, which has the same orders as in this form, you will get a copy of that order by mail at your last known address, which is written in ②. If this address is incorrect, or to find out if the orders were made permanent, contact the court.

Child Custody, Visitation, and Support

- **Child custody and visitation:** If you do not go to the hearing, the judge can make custody and visitation orders for your children without hearing from you.
- **Child support:** The judge can order child support based on the income of both parents. The judge can also have that support taken directly from a parent's paycheck. Child support can be a lot of money, and usually you have to pay until the child is age 18. File and serve a *Financial Statement (Simplified)* (form FL-155) or an *Income and Expense Declaration* (form FL-150) if you want the judge to have information about your finances. Otherwise, the court may make support orders without hearing from you.
- **Spousal support:** File and serve an *Income and Expense Declaration* (form FL-150) so the judge will have information about your finances. Otherwise, the court may make support orders without hearing from you.

Instructions for Law Enforcement

This order is effective when made. It is enforceable by any law enforcement agency that has received the order, is shown a copy of the order, or has verified its existence on the California Law Enforcement Telecommunications System (CLETS). If the law enforcement agency has not received proof of service on the restrained person, and the restrained person was not present at the court hearing, the agency shall advise the restrained person of the terms of the order and then shall enforce it. Violations of this order are subject to criminal penalties.

Arrest Required if Order Is Violated

If an officer has probable cause to believe that the restrained person had notice of the order and has disobeyed the order, the officer must arrest the restrained person. (Pen. Code, §§ 836(c)(1), 13701(b).) A violation of the order may be a violation of Penal Code section 166 or 273.6.

This is a Court Order.

Case Number:

18FDV04704C
801: RODRIGUEZ, LISA**If the Protected Person Contacts the Restrained Person**

Even if the protected person invites or consents to contact with the restrained person, the orders remain in effect and must be enforced. The protected person cannot be arrested for inviting or consenting to contact with the restrained person. The orders can be changed only by another court order. (Pen. Code, §13710(b).)

Conflicting Orders—Priorities for Enforcement

If more than one restraining order has been issued protecting the protected person from the restrained person, the orders must be enforced according to the following priorities (see Pen. Code, § 136.2, and Fam. Code, §§ 6383(h), 6405(b)):

1. *EPO*: If one of the orders is an *Emergency Protective Order* (form EPO-001), and it is more restrictive than other restraining or protective orders, it has precedence in enforcement over all other orders.
2. *No-Contact Order*: If there is no EPO, a no-contact order that is included in a restraining or protective order has precedence in enforcement over any other restraining or protective order.
3. *Criminal Order*: If none of the orders includes a no-contact order, a domestic violence protective order issued in a criminal case takes precedence in enforcement over any conflicting civil court order. Any nonconflicting terms of the civil restraining order remain in effect and enforceable.
4. *Family, Juvenile, or Civil Order*: If more than one family, juvenile, or other civil restraining or protective order has been issued, the one that was issued last must be enforced.

Child Custody and Visitation

- The custody and visitation orders are on form DV-140, items ③ and ④. They are sometimes also written on additional pages or referenced in DV-140 or other orders that are not part of the restraining order.
- **Forms DV-100 and DV-105 are not orders. Do not enforce them.**

Certificate of Compliance With VAWA

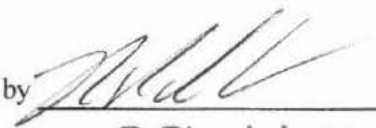
This temporary protective order meets all "full faith and credit" requirements of the Violence Against Women Act, 18 U.S.C. § 2265 (1994) (VAWA), upon notice of the restrained person. This court has jurisdiction over the parties and the subject matter; the restrained person has been or will be afforded notice and a timely opportunity to be heard as provided by the laws of this jurisdiction. **This order is valid and entitled to enforcement in each jurisdiction throughout the 50 states of the United States, the District of Columbia, all tribal lands, and all U.S. territories, commonwealths, and possessions and shall be enforced as if it were an order of that jurisdiction.**

(Clerk will fill out this part.)

—Clerk's Certificate—

I certify that this *Temporary Restraining Order* is a true and correct copy of the original on file in the court.

Date: 15 OCT 2018

Clerk, by  , Deputy

R. Diaz de Leon

**This is a Court Order.**

DV-100**Request for Domestic Violence Restraining Order**

You must also complete Form CLETS-001, Confidential CLETS Information, and give it to the clerk when you file this Request.

1 Name of Person Asking for Protection:

Age: 58

Your lawyer in this case (if you have one):

Name: George Gedulin State Bar No.: 277660

Firm Name: Law Office of George Gedulin

Address (If you have a lawyer for this case, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, give a different mailing address instead. You do not have to give your telephone, fax, or e-mail.):

Address: 12636 High Bluff Drive, Suite 400

City: San Diego State: CA Zip: 92130

Telephone: 858-333-5231 Fax: 858-519-5671

E-Mail Address: george@gedulinlaw.com

2 Name of Person You Want Protection From:

Jeffrey D. Lovin

Description of person you want protection from:

Sex: ☒ M ☐ F Height: 6' Weight: 180 Hair Color: Br Eye Color: Br
 Race: White Age: 60 Date of Birth: 2/17/1958
 Address (if known): 14043 Durango Dr.
 City: Del Mar State: CA Zip: 92014

3 Do you want an order to protect family or household members?

☐ Yes ☐ No

If yes, list them:

Full name	Sex	Age	Lives with you?	Relationship to you
<u>[Redacted]</u>	<u>[Redacted]</u>	<u>[Redacted]</u>	☒ Yes ☐ No	<u>[Redacted]</u>
<u>[Redacted]</u>	<u>[Redacted]</u>	<u>[Redacted]</u>	☐ Yes ☒ No	<u>[Redacted]</u>
<u>[Redacted]</u>	<u>[Redacted]</u>	<u>[Redacted]</u>	☐ Yes ☐ No	<u>[Redacted]</u>

☐ Check here if you need more space. Attach a sheet of paper and write "DV-100, Protected People" for a title.

4 What is your relationship to the person in (2)? (Check all that apply):

- a. ☐ We are now married or registered domestic partners.
- b. ☐ We used to be married or registered domestic partners.
- c. ☐ We live together.
- d. ☐ We used to live together.
- e. ☐ We are related by blood, marriage, or adoption (specify relationship): _____
- f. ☒ We are dating or used to date, or we are or used to be engaged to be married.
- g. ☐ We are the parents together of a child or children under 18:

Child's Name: _____ Date of Birth: _____

Child's Name: _____ Date of Birth: _____

Child's Name: _____ Date of Birth: _____

☐ Check here if you need more space. Attach a sheet of paper and write "DV-100, Additional Children" for a title.

- h. ☐ We have signed a Voluntary Declaration of Paternity for our child or children. (Attach a copy if you have one).

This is not a Court Order.

Clerk stamps date here when form is filed.

2018 OCT 15 PM 1:30

CLERK-SUPERIOR COURT
SAN DIEGO COUNTY, CA

Fill in court name and street address:

Superior Court of California, County of

SAN DIEGO SUPERIOR COURT
FAMILY COURT
1100 UNION STREET
SAN DIEGO, CA 92101

Court fills in case number when form is filed.

Case Numl

18FDV04704C

801: RODRIGUEZ, LISA



Case Number

5 Other Restraining Orders and Court Cases

- a. Are there any restraining/protective orders currently in place OR that have expired in the last six months (emergency protective orders, criminal, juvenile, family)?
☒ No ☐ Yes (date of order): _____ and (expiration date): _____ (Attach a copy if you have one).

- b. Have you or any other person named in (3) been involved in another court case with the person in (2)?

☒ No ☐ Yes If yes, check each kind of case and indicate where and when each was filed:

Kind of Case	County or Tribe Where Filed	Year Filed	Case Number (if known)
☐ Divorce, Nullity, Legal Separation	_____	_____	_____
☐ Civil Harassment	_____	_____	_____
☐ Domestic Violence	_____	_____	_____
☐ Criminal	_____	_____	_____
☐ Juvenile, Dependency, Guardianship	_____	_____	_____
☐ Child Support	_____	_____	_____
☐ Parentage, Paternity	_____	_____	_____
☐ Other (specify): _____	_____	_____	_____
☐ Check here if you need more space. Attach a sheet of paper and write "DV-100, Other Court Cases" for a title.			

Check the orders you want. ☒

6 ☒ Personal Conduct Orders

I ask the court to order the person in (2) not to do the following things to me or anyone listed in (3):

- a. ☒ Harass, attack, strike, threaten, assault (sexually or otherwise), hit, follow, stalk, molest, destroy personal property, disturb the peace, keep under surveillance, impersonate (on the Internet, electronically or otherwise), or block movements
 b. ☒ Contact, either directly or indirectly, in any way, including but not limited to, by telephone, mail or e-mail or other electronic means

The person in (2) will be ordered not to take any action to get the addresses or locations of any protected person unless the court finds good cause not to make the order.

7 ☒ Stay-Away Order

- a. I ask the court to order the person in (2) to stay at least 100 yards away from (check all that apply):

- ☒ Me ☐ My school
☒ My home ☒ Each person listed in (3)
☒ My job or workplace ☐ The child(ren)'s school or child care
☒ My vehicle ☐ Other (specify): _____

- b. If the person listed in (2) is ordered to stay away from all the places listed above, will he or she still be able to get to his or her home, school, job, workplace, or vehicle? ☒ Yes ☐ No (If no, explain): _____

8 ☐ Move-Out Order

(If the person in (2) lives with you and you want that person to stay away from your home, you must ask for this move-out order.)

I ask the court to order the person in (2) to move out from and not return to (address): _____

I have the right to live at the above address because (explain): _____

This is not a Court Order.



Case Number

9 Guns or Other Firearms or Ammunition

I believe the person in (2) owns or possesses guns, firearms, or ammunition. ☐ Yes ☐ No ☐ I don't know
If the judge approves the order, the person in (2) will be ordered not to own, possess, purchase, or receive a firearm or ammunition. The person will be ordered to sell to, or store with, a licensed gun dealer, or turn in to law enforcement, any guns or firearms that he or she owns or possesses.

10 ☒ Record Unlawful Communications

I ask for the right to record communications made to me by the person in (2) that violate the judge's orders.

11 ☐ Care of Animals

I ask for the sole possession, care, and control of the animals listed below. I ask the court to order the person in (2) to stay at least _____ yards away from and not take, sell, transfer, encumber, conceal, molest, attack, strike, threaten, harm, or otherwise dispose of the following animals:

I ask for the animals to be with me because:

12 ☐ Child Custody and Visitation

a. ☐ I do not have a child custody or visitation order and I want one.

b. ☐ I have a child custody or visitation order and I want it changed.

If you ask for orders, you must fill out and attach Form DV-105, Request for Child Custody and Visitation Orders. You and the other parent may tell the court that you want to be legal parents of the children (use Form DV-180, Agreement and Judgment of Parentage).

13 ☐ Child Support (Check all that apply):

a. ☐ I do not have a child support order and I want one.

b. ☐ I have a child support order and I want it changed.

c. ☐ I now receive or have applied for TANF, Welfare, CalWORKS, or Medi-Cal.

If you ask for child support orders, you must fill out and attach form FL-150, Income and Expense Declaration or Form FL-155, Financial Statement (Simplified).

14 ☐ Property Control

I ask the court to give **only** me temporary use, possession, and control of the property listed here:

15 ☐ Debt Payment

I ask the court to order the person in (2) to make these payments while the order is in effect:

☐ *Check here if you need more space. Attach a sheet of paper and write "DV-100, Debt Payment" for a title.*

Pay to: _____ For: _____ Amount: \$ _____ Due date: _____

16 ☐ Property Restraint

I am married to or have a registered domestic partnership with the person in (2). I ask the judge to order that the person in (2) not borrow against, sell, hide, or get rid of or destroy any possessions or property, except in the usual course of business or for necessities of life. I also ask the judge to order the person in (2) to notify me of any new or big expenses and to explain them to the court.

17 ☐ Spousal Support

I am married to or have a registered domestic partnership with the person in (2) and no spousal support order exists. I ask the court to order the person in (2) to pay spousal support. *(You must complete, file, and serve Form FL-150, Income and Expense Declaration, before your hearing).*

This is not a Court Order.



Case Number

18FDV04704C
801: RODRIGUEZ, LISA**18** ☐ **Rights to Mobile Device and Wireless Phone Account****a.** ☐ **Property control of mobile device and wireless phone account**

I ask the court to give only me temporary use, possession, and control of the following mobile devices: _____ and the wireless phone account for the following wireless phone numbers because the account currently belongs to the person in **(2)**:

(including area code): _____ ☐ my number ☐ number of child in my care

(including area code): _____ ☐ my number ☐ number of child in my care

(including area code): _____ ☐ my number ☐ number of child in my care

☐ Check here if you need more space. Attach a sheet of paper and write "DV-100, Rights to Mobile Device and Wireless Phone Account" for a title.

b. ☐ **Debt Payment**

I ask the court to order the person in **(2)** to make the payments for the wireless phone accounts listed in 18a because:

Name of the wireless service provider is: _____ Amount: \$ _____ Due Date: _____

If you are requesting this order, you must complete, file, and serve Form FL-150, Income and Expense Declaration, before your hearing.

c. ☐ **Transfer of Wireless Phone Account**

I ask the court to order the wireless service provider to transfer the billing responsibility and rights to the wireless phone numbers listed in 18a to me because the account currently belongs to the person in **(2)**.

If the judge makes this order, you will be financially responsible for these accounts, including monthly service fees and costs of any mobile devices connected to these phone numbers. You may be responsible for other fees. You must contact the wireless service provider to find out what fees you will be responsible for and whether you are eligible for an account.

19 ☐ **Insurance**

I ask the court to order the person in **(2)** NOT to cash, borrow against, cancel, transfer, dispose of, or change the beneficiaries of any insurance or coverage held for the benefit of me or the person in **(2)**, or our child(ren), for whom support may be ordered, or both.

20 ☒ **Lawyer's Fees and Costs**

I ask that the person in **(2)** pay some or all of my lawyer's fees and costs.

You must complete, file, and serve form FL-150, Income and Expense Declaration, before your hearing.

21 ☐ **Payments for Costs and Services**

I ask the court to order the person in **(2)** to pay the following:

*You can ask for lost earnings or your costs for services caused directly by the person in **(2)** (damaged property, medical care, counseling, temporary housing, etc.). You must bring proof of these expenses to your hearing.*

Pay to: _____ For: _____ Amount: \$ _____

Pay to: _____ For: _____ Amount: \$ _____

22 ☒ **Batterer Intervention Program**

I ask the court to order the person listed in **(2)** to go to a 52-week batterer intervention program and show proof of completion to the court.

23 ☒ **Other Orders**

What other orders are you asking for? I request that I not be contacted by any third parties on behalf of the respondent other than by a licensed attorney, hired to represent him in this matter

☐ Check here if you need more space. Attach a sheet of paper and write "DV-100, Other Orders" for a title.

This is not a Court Order.



Case Number

24 ☐ **Time for Service (Notice)**

The papers must be personally served on the person in ② at least five days before the hearing, unless the court orders a shorter time for service. If you want there to be fewer than five days between service and the hearing, explain why below. For help, read Form DV-200-INFO, "What Is Proof of Personal Service"?

25 **No Fee to Serve (Notify) Restrained Person**

If you want the sheriff or marshal to serve (notify) the restrained person about the orders for free, ask the court clerk what you need to do.

26 **Court Hearing**

The court will schedule a hearing on your request. If the judge does not make the orders effective right away ("temporary restraining orders"), the judge may still make the orders after the hearing. If the judge does not make the orders effective right away, you can ask the court to cancel the hearing. Read form DV-112, *Waiver of Hearing on Denied Request for Temporary Restraining Order*, for more information.

27 **Describe Abuse**

Describe how the person in ② abused you. Abuse means to intentionally or recklessly cause or attempt to cause bodily injury to you; or to place you or another person in reasonable fear of imminent serious bodily injury; or to harass, attack, strike, threaten, assault (sexually or otherwise), hit, follow, stalk, molest, keep you under surveillance, impersonate (on the Internet, electronically or otherwise), batter, telephone, or contact you; or to disturb your peace; or to destroy your personal property. (For a complete definition, see Fam. Code, §§ 6203, 6320.)

a. Date of most recent abuse: 10/13/2018

1. Who was there? _____

2. Describe how the person in ② abused you or your child(ren):

See attached declaration of [REDACTED]

☒ Check here if you need more space. Attach a sheet of paper and write "DV-100, Recent Abuse" for a title.

3. Did the person in ② use or threaten to use a gun or any other weapon? ☒ No ☐ Yes (If yes, describe):

4. Describe any injuries: _____

5. Did the police come? ☐ No ☐ Yes

If yes, did they give you or the person in ② an Emergency Protective Order? ☐ Yes ☐ No ☐ I don't know
Attach a copy if you have one.

The order protects ☐ you or ☐ the person in ②

This is not a Court Order.

Case Number

18FDV04704C
801: RODRIGUEZ, LISA**(27) Describe Abuse (continued)**

Has the person in (2) abused you (or your child(ren)) other times?

b. Date of abuse: _____

1. Who was there? _____

2. Describe how the person in (2) abused you or your child(ren):

~~See attached declaration of~~ [REDACTED]☐ Check here if you need more space. Attach a sheet of paper and write "DV-100, Recent Abuse" for a title.3. Did the person in (2) use or threaten to use a gun or any other weapon? ☐ No ☐ Yes (If yes, describe): _____

4. Describe any injuries: _____

5. Did the police come? ☐ No ☐ Yes

If yes, did they give you or the person in (2) an Emergency Protective Order?

☐ Yes ☐ No ☐ I don't know Attach a copy if you have one.The order protects ☐ you or ☐ the person in (2)If the person in (2) abused you other times, check here ☐ and use Form DV-101, Description of Abuse or describe any previous abuse on an attached sheet of paper and write "DV-100, Previous Abuse" for a title.**(28) Other Persons to Be Protected**The persons listed in item (3) need an order for protection because (describe): I live in the same home as my [REDACTED]
[REDACTED] has witnessed Mr. Lovin trespass onto our property on multiple occasions and is in fear of Mr. Lovin make personal contact or potential physical harm if he is on the property again.**(29)** Number of pages attached to this form, if any: 54

I declare under penalty of perjury under the laws of the State of California that the information above is true and correct.

Date: 10/15/2018 11:50:01 AM PDT

Type or print your name

Date: 10-15-18

George Gedulin

Lawyer's name, if you have one

DocuSigned by:

CF7DC4F2BBCC497...

Sign your name

Electronic
Signature

Lawyer's signature

This is not a Court Order.

EXHIBIT-1



J

Jeff Lovin >

Fri, Aug 31, 6:59 PM

I waited til you had time to get home. I have repeatedly made it very clear to you that I don't want to be with you. I don't want to date you. I don't want to talk to you. I don't want to communicate in anyway with you. Stay away from me. Stay away from my family. Stay away from my home. Stay away from my jobs. I have been advised to obtain a restraining order. I have warned you over and over that I will get a restraining order if you do not leave me alone and now you give me no choice. If



Text Message





J

Jeff Lovin >

you give me no choice. If you or any of your representatives or friends have any kind of contact with any of my family members or come to my home or my job or anywhere else I will call the police.

Why do you not leave me alone? Why do you insist on me having to have a restraining order to leave me alone? I have kindly ask you over and over and over again!! I have purposely hid my home, my work, my [REDACTED] and my family members from you for a reason. I fear for my life, my career and for my family. My



Text Message





J

Jeff Lovin >

...and for my family. My
[REDACTED] has a weak heart and
already had a heart attack
and you found her and
showed up at her home and
scared her even though you
know she has a weak heart!
And you're a doctor! I have
been running from you for
years i've been way too
nice! Way way too nice!. You
need to move on! I am
moving on. Stay away from
me and my family. My entire
family is now aware of the
situation. They will not talk
to you. They will call the
police. You are stalking me
and harrassing me. Don't
leave coffee and flowers for
me. Don't knock on my
door.



Text Message



EXHIBIT-2



Jeff Lovin >

allowed cheapness to
overwhelm my
generosity.

.I see now that it is more
important to love the person
rather than act from need or
reflex.

Foolish me, I
was lucky to have met the
most beautiful, kind, giving
n caring woman I have ever
encountered in my life. And
the specter of Hugh my
father overwhelmed my
heart n my judgement. I
did goggle your [REDACTED] n
dropped off coffee.

I did have a pi in a white car
drive by your house but
realized I was wrong, I loved
you no matter what, n I fired
him. I did not drive by



Text Message





Jeff Lovin >

fired Allen as an advisor n
have placed 4plex n ranch
on market. My intent is to
pay off Durango as you
advised. Should I ever thru
some miracle to be lucky
enough to regain your love, I
will put you on title as co
owner. I know
that I have a great deal of
negativity to overcome even
to be blessed with your
friendship,. All I ask at this
point, given all we have
shared, is that we can at
least intermittently talk or
text.

I love you with all
my heart, Jeff

Today 12:11 PM



Text Message



EXHIBIT-3



D

Dr. Bernberg >

We are now at full employment

Hi it's Fred. Bevis eg Jeff is hanging in there. He wishes he had so many things better or differently. He would like to give u \$50000 for your school loans if you will talk to him. Don't shoot me I'm just the messenger

Saturday 9:32 AM

Jeff wanted u to know that he had bought the 80,000 Tiffany ring u liked and that he is on his way to the mall to buy two more self help books



iMessage



EXHIBIT-4

BEFORE THE
MEDICAL BOARD OF CALIFORNIA
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation
Against:

JEFFREY DOUGLAS LOVIN, M.D.

Physician's and Surgeon's
Certificate No. G85644

Respondent

Case No. 800-2016-024671

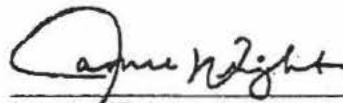
DECISION

The attached Stipulated Settlement and Disciplinary Order is hereby adopted as the Decision and Order of the Medical Board of California, Department of Consumer Affairs, State of California.

This Decision shall become effective at 5:00 p.m. on July 21, 2017.

IT IS SO ORDERED: June 22, 2017.

MEDICAL BOARD OF CALIFORNIA



Jamie Wright, JD, Chair
Panel A

1 XAVIER BECERRA
Attorney General of California
2 JANE ZACK SIMON
Supervising Deputy Attorney General
3 State Bar No. 116564
4 455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004
Telephone: (415) 703-5544
5 Facsimile: (415) 703-5480
E-mail: Janezack.simon@doj.ca.gov
6 *Attorneys for Complainant*

7 **BEFORE THE**
8 **MEDICAL BOARD OF CALIFORNIA**
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. 800-2016-024671

12 **JEFFREY DOUGLAS. LOVIN, M.D.**
14043 Durango Drive
Del Mar, CA 92014

13 **STIPULATED SETTLEMENT AND**
14 **DISCIPLINARY ORDER**

15 Physician's and Surgeon's Certificate No.
G85644

Respondent.

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

18 **PARTIES**

19 1. Kimberly Kirchmeyer (Complainant) is the Executive Director of the Medical Board
20 of California (Board). She brought this action solely in her official capacity and is represented in
21 this matter by Xavier Becerra, Attorney General of the State of California, by Jane Zack Simon,
22 Supervising Deputy Attorney General.

23 2. Respondent Jeffrey Douglas Lovin, M.D. (Respondent) is represented in this
24 proceeding by attorneys William R. Winship, Jr., 591 Camino de la Reina, Suite 1015
25 San Diego, CA 92108 and Albert J. Garcia, 2000 Powell Street, Suite 1290, Emeryville, CA
26 94608.

27 ///

1 3. On March 17, 2000, the Board issued Physician's and Surgeon's Certificate No.
2 G85644 to Jeffrey Douglas. Lovin, M.D.. The Physician's and Surgeon's Certificate was in full
3 force and effect at all times relevant to the charges brought in Accusation No. 800-2016-024671,
4 and will expire on February 28, 2018, unless renewed.

5 JURISDICTION

6 4. Accusation No. 800-2016-024671 (Accusation) was filed by the Medical Board and
7 is currently pending against Respondent. The Accusation and all other statutorily required
8 documents were properly served on Respondent, who filed a Notice of Defense. A copy of the
9 Accusation is attached as Exhibit A.

10 ADVISEMENT AND WAIVERS

11 5. Respondent has carefully read, fully discussed with counsel, and understands the
12 charges and allegations in Accusation No. 800-2016-024671. Respondent has also carefully read,
13 fully discussed with counsel, and understands the effects of this Stipulated Settlement and
14 Disciplinary Order.

15 6. Respondent is fully aware of his 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 him; the right to present evidence and to testify on his 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 and agrees that the charges and allegations in Accusation
25 No. 800-2016-024671, if proven at a hearing, constitute cause for imposing discipline upon his
26 Physician's and Surgeon's Certificate.

27 ///

1 9. For the purpose of resolving the Accusation without the expense and uncertainty of
2 further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual
3 basis for the charges in the Accusation, and that Respondent hereby gives up his right to contest
4 those charges.

5 10. Respondent agrees that his Physician's and Surgeon's Certificate is subject to
6 discipline and he agrees to be bound by the Board's imposition of discipline as set forth in the
7 Disciplinary Order below.

8 RESERVATION

9 11. The admissions made by Respondent herein are only for the purposes of this
10 proceeding, or any other proceedings in which the Board or other professional licensing agency
11 is involved, and shall not be admissible in any other criminal or civil proceeding.

12 CONTINGENCY

13 12. This Stipulation shall be subject to the approval of the Board. Respondent
14 understands and agrees that Board staff and counsel for Complainant may communicate directly
15 with the Board regarding this stipulation, without notice to or participation by Respondent or his
16 counsel. If the Board fails to adopt this Stipulation as its Order in this matter, the Stipulation
17 shall be of no force or effect; it shall be inadmissible in any legal action between the parties; and
18 the Board shall not be disqualified from further action in this matter by virtue of its consideration
19 of this Stipulation. Respondent also understands and agrees that he will not be able to withdraw
20 or modify this Stipulation while it is before the Board for consideration

21 13. The parties understand and agree that Portable Document Format (PDF) and
22 facsimile copies of this Stipulated Settlement and Disciplinary Order, including Portable
23 Document Format (PDF) and facsimile signatures thereto, shall have the same force and effect as
24 the originals.

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

28 ///

1
2 **DISCIPLINARY ORDER**

3 IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. G85644 issued
4 to Respondent Jeffrey Douglas. Lovin, M.D. is revoked. However, the revocation is stayed and
5 Respondent is placed on probation for five (5) years on the following terms and conditions.

6 1. **EDUCATION COURSE.** Within 60 calendar days of the effective date of this
7 Decision, and on an annual basis thereafter, Respondent shall submit to the Board or its designee
8 for its prior approval educational program(s) or course(s) which shall not be less than 25 hours
9 per year, for each year of probation. The educational program(s) or course(s) shall focus on the
10 area of breast imaging studies, be aimed at correcting any areas of deficient practice or
11 knowledge, and shall be Category I certified. The educational program(s) or course(s) shall be at
12 Respondent's expense and shall be in addition to the Continuing Medical Education (CME)
13 requirements for renewal of licensure. Following the completion of each course, the Board or its
14 designee may administer an examination to test Respondent's knowledge of the course.
15 Respondent shall provide proof of attendance of the courses taken in satisfaction of this condition.

16 2. **PSYCHOTHERAPY.** Within 60 calendar days of the effective date of this Decision,
17 Respondent shall submit to the Board or its designee for prior approval the name and
18 qualifications of a California-licensed board certified psychiatrist or a licensed psychologist who
19 has a doctoral degree in psychology and at least five years of postgraduate experience in the
20 diagnosis and treatment of emotional and mental disorders. Upon approval, Respondent shall
21 undergo and continue psychotherapy treatment as recommended by the treating therapist,
22 including any modifications to the frequency of psychotherapy, until the Board or its designee
23 deems that no further psychotherapy is necessary.

24 The psychotherapist shall consider any information provided by the Board or its designee
25 and any other information the psychotherapist deems relevant and shall furnish a written
26 evaluation report to the Board or its designee. Respondent shall cooperate in providing the
27 psychotherapist with any information and documents that the psychotherapist may deem
28 pertinent. Respondent shall have the treating psychotherapist submit quarterly status reports to the

1 Board or its designee.

2 Over the course of probation, the Board or its designee may require Respondent to undergo
3 psychiatric evaluations (and psychological testing, if deemed necessary) by a Board-appointed
4 board certified psychiatrist. Respondent shall cooperate with the appointed evaluator, and shall
5 provide prompt access to any information or records requested by the evaluator. The evaluator
6 shall furnish a written evaluation report to the Board or its designee.

7 If, prior to the completion of probation, Respondent is found to be mentally unfit to
8 resume the practice of medicine without restrictions, the Board shall retain continuing jurisdiction
9 over Respondent's license and the period of probation shall be extended until the Board
10 determines that Respondent is mentally fit to resume the practice of medicine without restrictions.

11 Respondent shall pay the cost of all psychotherapy and required evaluations.

12 3. MONITORING - PRACTICE. Within 30 calendar days of the effective date of this
13 Decision, Respondent shall submit to the Board or its designee for prior approval as a practice
14 monitor, the name and qualifications of one or more licensed physicians and surgeons whose
15 licenses are valid and in good standing, and who are preferably American Board of Medical
16 Specialties (ABMS) certified. A monitor shall have no prior or current business or personal
17 relationship with Respondent, or other relationship that could reasonably be expected to
18 compromise the ability of the monitor to render fair and unbiased reports to the Board, including
19 but not limited to any form of bartering, shall be in Respondent's field of practice, and must agree
20 to serve as Respondent's monitor. Respondent shall pay all monitoring costs.

21 The Board or its designee shall provide the approved monitor with copies of the Decision
22 and Accusation, and a proposed monitoring plan. Within 15 calendar days of receipt of the
23 Decision, Accusation, and proposed monitoring plan, the monitor shall submit a signed statement
24 that the monitor has read the Decision and Accusation, fully understands the role of a monitor,
25 and agrees or disagrees with the proposed monitoring plan. If the monitor disagrees with the
26 proposed monitoring plan, the monitor shall submit a revised monitoring plan with the signed
27 statement for approval by the Board or its designee.

28 Within 60 calendar days of the effective date of this Decision, and continuing throughout

1 probation, Respondent's practice shall be monitored by the approved monitor. Respondent shall
2 make all records available for immediate inspection and copying on the premises by the monitor
3 at all times during business hours and shall retain the records for the entire term of probation.

4 If Respondent fails to obtain approval of a monitor within 60 calendar days of the effective
5 date of this Decision, Respondent shall receive a notification from the Board or its designee to
6 cease the practice of medicine within three (3) calendar days after being so notified. Respondent
7 shall cease the practice of medicine until a monitor is approved to provide monitoring
8 responsibility.

9 The monitor shall submit a quarterly written report to the Board or its designee which
10 includes an evaluation of Respondent's performance, indicating whether Respondent's practices
11 are within the standards of practice of practice, and whether Respondent is practicing medicine
12 safely. It shall be the sole responsibility of Respondent to ensure that the monitor submits the
13 quarterly written reports to the Board or its designee within 10 calendar days after the end of the
14 preceding quarter.

15 If the monitor resigns or is no longer available, Respondent shall, within 5 calendar days of
16 such resignation or unavailability, submit to the Board or its designee, for prior approval, the
17 name and qualifications of a replacement monitor who will be assuming that responsibility within
18 15 calendar days. If Respondent fails to obtain approval of a replacement monitor within 60
19 calendar days of the resignation or unavailability of the monitor, Respondent shall receive a
20 notification from the Board or its designee to cease the practice of medicine within three (3)
21 calendar days after being so notified. Respondent shall cease the practice of medicine until a
22 replacement monitor is approved and assumes monitoring responsibility.

23 In lieu of a monitor, Respondent may participate in a professional enhancement program
24 approved in advance by the Board or its designee that includes, at minimum, quarterly chart
25 review, semi-annual practice assessment, and semi-annual review of professional growth and
26 education. Respondent shall participate in the professional enhancement program at Respondent's
27 expense during the term of probation.

28 ///

1 4. SOLO PRACTICE/LOCUM TENENS PROHIBITION. Respondent is prohibited
2 from engaging in the solo practice of medicine, or from practicing in a locum tenens capacity

3 Prohibited solo practice includes, but is not limited to, a practice where: 1) Respondent
4 merely shares office space with another physician but is not affiliated for purposes of providing
5 patient care, or 2) Respondent is the sole physician-practitioner at that location.

6 If Respondent fails to establish a practice with another physician or secure employment in
7 an appropriate practice setting within 60 calendar days of the effective date of this Decision,
8 Respondent shall receive a notification from the Board or its designee to cease the practice of
9 medicine within three (3) calendar days after being so notified. Respondent shall not resume
10 practice until an appropriate practice setting is established.

11 If, during the course of the probation, Respondent's practice setting changes and the
12 Respondent is no longer practicing in a setting in compliance with this Decision, Respondent shall
13 notify the Board or its designee within five (5) calendar days of the practice setting change. If
14 Respondent fails to establish a practice with another physician or secure employment in an
15 appropriate practice setting within 60 calendar days of the practice setting change, Respondent
16 shall receive a notification from the Board or its designee to cease the practice of medicine within
17 three (3) calendar days after being so notified. Respondent shall not resume practice until an
18 appropriate practice setting is established.

19 5. COMPLIANCE WITH ORDER ISSUED BY COLORADO MEDICAL BOARD:

20 Respondent shall fully comply with the Preceptorship Program recommended by the Center
21 for Personalized Education for Physicians in accordance with the Stipulation and Final Agency
22 Order issued by the Colorado Medical Board on July 14, 2016. Respondent shall provide access
23 to the Board or its designee to information regarding the Preceptorship Program, including but not
24 limited to his compliance with the Preceptorship Program, reports issued by the Preceptor, and his
25 progress in the Preceptorship Program.

26 6. NOTIFICATION. Within seven (7) days of the effective date of this Decision,
27 Respondent shall provide a true copy of this Decision and Accusation to the Chief of Staff or the
28 Chief Executive Officer at every hospital where privileges or membership are extended to

Respondent, at any other facility where Respondent engages in the practice of medicine, including all physician and any registries or other similar agencies, and to the Chief Executive Officer at every insurance carrier which extends malpractice insurance coverage to Respondent. Respondent shall submit proof of compliance to the Board or its designee within 15 calendar days.

This condition shall apply to any change(s) in hospitals, other facilities or insurance carrier.

7. SUPERVISION OF PHYSICIAN ASSISTANTS AND ADVANCED PRACTICE NURSES. During probation, Respondent is prohibited from supervising physician assistants and advanced practice nurses.

8. OBEY ALL LAWS. Respondent shall obey all federal, state and local laws, all rules governing the practice of medicine in California and remain in full compliance with any court ordered criminal probation, payments, and other orders.

9. QUARTERLY DECLARATIONS. Respondent shall submit quarterly declarations under penalty of perjury on forms provided by the Board, stating whether there has been compliance with all the conditions of probation.

Respondent shall submit quarterly declarations not later than 10 calendar days after the end of the preceding quarter.

10. GENERAL PROBATION REQUIREMENTS.

Compliance with Probation Unit

Respondent shall comply and cooperate with the Board's probation unit.

Address Changes

Respondent shall, at all times, keep the Board informed of Respondent's business and residence addresses, email address (if available), and telephone number. Changes of such addresses shall be immediately communicated in writing to the Board or its designee. Under no circumstances shall a post office box serve as an address of record, except as allowed by Business and Professions Code section 2021(b).

Place of Practice

Respondent shall not engage in the practice of medicine in Respondent's or patient's place

1 of residence, unless the patient resides in a skilled nursing facility or other similar licensed
2 facility.

3 License Renewal

4 Respondent shall maintain a current and renewed California physician's and surgeon's
5 license.

6 Travel or Residence Outside California

7 Respondent shall immediately inform the Board or its designee, in writing, of travel to any
8 areas outside the jurisdiction of California which lasts, or is contemplated to last, more than thirty
9 (30) calendar days.

10 In the event Respondent should leave the State of California to reside or to practice
11 ,Respondent shall notify the Board or its designee in writing 30 calendar days prior to the dates of
12 departure and return.

13 11. INTERVIEW WITH THE BOARD OR ITS DESIGNEE. Respondent shall be
14 available in person upon request for interviews either at Respondent's place of business or at the
15 probation unit office, with or without prior notice throughout the term of probation.

16 12. NON-PRACTICE WHILE ON PROBATION. Respondent shall notify the Board or
17 its designee in writing within 15 calendar days of any periods of non-practice lasting more than
18 30 calendar days and within 15 calendar days of Respondent's return to practice. Non-practice is
19 defined as any period of time Respondent is not practicing medicine as defined in Business and
20 Professions Code sections 2051 and 2052 for at least 40 hours in a calendar month in direct
21 patient care, clinical activity or teaching, or other activity as approved by the Board. If
22 Respondent resides in California and is considered to be in non-practice, Respondent shall
23 comply with all terms and conditions of probation. All time spent in an intensive training
24 program which has been approved by the Board or its designee shall not be considered non-
25 practice and does not relieve Respondent from complying with all the terms and conditions of
26 probation. Practicing medicine in another state of the United States or Federal jurisdiction while
27 on probation with the medical licensing authority of that state or jurisdiction shall not be
28 considered non-practice. A Board-ordered suspension of practice shall not be considered as a

1 period of non-practice.

2 In the event Respondent's period of non-practice while on probation exceeds 18 calendar
3 months, Respondent shall successfully complete the Federation of State Medical Boards' Special
4 Purpose Examination, or, at the Board's discretion, a clinical competence assessment program
5 that meets the criteria of Condition 18 of the current version of the Board's "Manual of Model
6 Disciplinary Orders and Disciplinary Guidelines" prior to resuming the practice of medicine.

7 Respondent's period of non-practice while on probation shall not exceed two (2) years.

8 Periods of non-practice will not apply to the reduction of the probationary term.

9 Periods of non-practice for a Respondent residing outside of California will relieve
10 Respondent of the responsibility to comply with the probationary terms and conditions with the
11 exception of this condition and the following terms and conditions of probation: Obey All Laws;
12 General Probation Requirements; Quarterly Declarations; Abstain from the Use of Alcohol and/or
13 Controlled Substances; and Biological Fluid Testing..

14 13. COMPLETION OF PROBATION. Respondent shall comply with all financial
15 obligations (e.g., restitution, probation costs) not later than 120 calendar days prior to the
16 completion of probation. Upon successful completion of probation, Respondent's certificate shall
17 be fully restored.

18 14. VIOLATION OF PROBATION. Failure to fully comply with any term or condition
19 of probation is a violation of probation. If Respondent violates probation in any respect, the
20 Board, after giving Respondent notice and the opportunity to be heard, may revoke probation and
21 carry out the disciplinary order that was stayed. If an Accusation, or Petition to Revoke Probation,
22 or an Interim Suspension Order is filed against Respondent during probation, the Board shall have
23 continuing jurisdiction until the matter is final, and the period of probation shall be extended until
24 the matter is final.

25 15. LICENSE SURRENDER. Following the effective date of this Decision, if
26 Respondent ceases practicing due to retirement or health reasons or is otherwise unable to satisfy
27 the terms and conditions of probation, Respondent may request to surrender his or her license.
28 The Board reserves the right to evaluate Respondent's request and to exercise its discretion in

determining whether or not to grant the request, or to take any other action deemed appropriate and reasonable under the circumstances. Upon formal acceptance of the surrender, Respondent shall within 15 calendar days deliver Respondent's wallet and wall certificate to the Board or its designee and Respondent shall no longer practice medicine. Respondent will no longer be subject to the terms and conditions of probation. If Respondent re-applies for a medical license, the application shall be treated as a petition for reinstatement of a revoked certificate.

16. PROBATION MONITORING COSTS. Respondent shall pay the costs associated with probation monitoring each and every year of probation, as designated by the Board, which may be adjusted on an annual basis. Such costs shall be payable to the Medical Board of California and delivered to the Board or its designee no later than January 31 of each calendar year.

ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorneys. I understand the Stipulation and the effect it will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Medical Board of California.

DATED: 5/11/17

Jeffrey Douglas Lovin
JEFFREY DOUGLAS LOVIN, M.D.
Respondent

APPROVAL

We have read and fully discussed with Respondent Jeffrey Douglas Lovin, M.D. the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order, and approve its form and content.

DATED: 5/10/17

William R. Winship, Jr.
WILLIAM R. WINSHIP, JR.
Attorney for Respondent

DATED: May 9, 2017

Albert J. Garcia
ALBERT J. GARCIA
Attorney for Respondent

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
submitted for consideration by the Medical Board of California.

Dated:

Respectfully submitted,

XAVIER BECERRA
Attorney General of California


JANE ZACK SIMON
Supervising Deputy Attorney General
Attorneys for Complainant

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EXHIBIT A

1 KAMALA D. HARRIS
Attorney General of California
2 JANE ZACK SIMON
Supervising Deputy Attorney General
3 MACHAELA M. MINGARDI
Deputy Attorney General
4 State Bar No. 194400
455 Golden Gate Avenue, Suite 11000
5 San Francisco, CA 94102-7004
Telephone: (415) 703-5696
6 Facsimile: (415) 703-5480
Attorneys for Complainant

FILED
STATE OF CALIFORNIA
MEDICAL BOARD OF CALIFORNIA
SACRAMENTO Nov 7 2016
BY: [Signature] ANALYST

7
8 BEFORE THE
MEDICAL BOARD OF CALIFORNIA
9 DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

10 In the Matter of the Accusation Against:

Case No. 800-2016-024671

11 Jeffrey Douglas Lovin, M.D.
12 14043 Durango Drive
13 Del Mar, CA 92014

ACCUSATION

14 Physician's and Surgeon's Certificate
No. G85644,

15 Respondent.

16
17 Complainant alleges:

18 PARTIES

19 1. Kimberly Kirchmeyer (Complainant) brings this Accusation solely in her official
20 capacity as the Executive Director of the Medical Board of California, Department of Consumer
21 Affairs (Board).

22 2. On or about March 17, 2000, the Medical Board issued Physician's and Surgeon's
23 Certificate Number G 85644 to Jeffrey Douglas Lovin, M.D. (Respondent). The Physician's and
24 Surgeon's Certificate was in full force and effect at all times relevant to the charges brought
25 herein and will expire on February 28, 2018, unless renewed.

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1 battery in the State of California.

2 b. From 2009 to 2013, Respondent was subsequently arrested several other times and
3 charged with resisting arrest, domestic violence and violating a restraining order. The charges
4 were all later dismissed, but Respondent failed to report any arrest, charge or his criminal
5 conviction to the Colorado Board.

6 c. In March 2013, Respondent was released from his position as a locum tenens physician
7 radiologist at a medical center due to "alleged inaccuracies in radiology reports and reports of
8 inappropriate behavior." Respondent failed to report this adverse action to the Colorado Board.

9 d. On October 14, 2014, the Colorado Board ordered Respondent to undergo an
10 evaluation by the Colorado Physician Health Program (CPHP), which found that "Respondent has
11 a physical or mental illness condition that renders Respondent unable to perform a medical
12 service with reasonable skill and with safety to patients in the absence of treatment monitoring."

13 5. Respondent was placed on five years probation, with terms and conditions
14 including a prohibition on solo practice and practicing as a locum tenens physician; an hourly
15 practice restriction of 40 hours per week; treatment as recommended by CPHP; treatment
16 monitoring by CPHP; and a competence assessment. A copy of the Order issued by the Colorado
17 Board is attached as Exhibit A.

18 6. Respondent now resides in the State of California.

19 7. Respondent's conduct and the action of the Colorado Board as set forth in
20 paragraphs 4 and 5, above, constitute unprofessional conduct within the meaning of section 2305
21 and conduct subject to discipline within the meaning of section 141(a).

22 **PRAYER**

23 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
24 and that following the hearing, the Medical Board of California issue a decision:

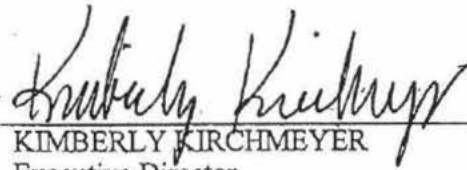
25 1. Revoking or suspending Physician's and Surgeon's Certificate Number G85644,
26 issued to Jeffrey Douglas Lovin, M.D.;

27 2. Revoking, suspending or denying approval of Jeffrey Douglas Lovin, M.D.'s
28 authority to supervise physician assistants, pursuant to section 3527 of the Code;

1 3. Ordering Jeffrey Douglas Lovin, M.D., if placed on probation, to pay the Board the
2 costs of probation monitoring; and

3 4. Taking such other and further action as deemed necessary and proper.
4

5
6 DATED: November 7, 2016



KIMBERLY KIRCHMEYER
Executive Director
Medical Board of California
Department of Consumer Affairs
State of California
Complainant

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EXHIBIT A



BEFORE THE COLORADO MEDICAL BOARD

STATE OF COLORADO

CASE NO. 2013-3284-A

STIPULATION AND FINAL AGENCY ORDER

IN THE MATTER OF THE DISCIPLINARY PROCEEDING REGARDING THE
LICENSE TO PRACTICE MEDICINE IN THE STATE OF COLORADO OF
JEFFREY DOUGLAS LOVIN, M.D., LICENSE NUMBER DR-29034,

Respondent.

IT IS HEREBY STIPULATED and agreed by and between Inquiry Panel A
("Panel") of the Colorado Medical Board ("Board") and Jeffrey Douglas Lovin, M.D.
("Respondent") (collectively, the "Parties") as follows:

JURISDICTION AND CASE HISTORY

1. Respondent was licensed to practice medicine in the state of Colorado on August 5, 1988 and was issued license number DR-29034, which Respondent has held continuously since that date ("License").

2. The Panel and the Board have jurisdiction over Respondent and over the subject matter of this proceeding.

3. On January 14, 2016, the Panel reviewed case number 2013-3284-A and determined that further proceedings by formal complaint were warranted pursuant to Section 12-36-118(4)(c)(IV), C.R.S.

4. It is the intent of the parties and the purpose of this Stipulation and Final Agency Order ("Order") to provide for a settlement of all matters set forth in case number 2013-3284-A, without the necessity of conducting a formal disciplinary hearing. This Order constitutes the entire agreement between the parties, and there are no other agreements or promises, written or oral, which modify, interpret, construe or affect this Order.

5. Respondent understands that:

a. Respondent has the right to be represented by an attorney of the Respondent's choice, and Respondent is represented by counsel in this matter;

b. Respondent has the right to a formal complaint and disciplinary hearing pursuant to Sections 12-36-118(4)(c)(IV) and 12-36-118(5), C.R.S.;

c. By entering into this Order, Respondent is knowingly and voluntarily giving up the right to a formal complaint and disciplinary hearing, admits the facts contained in this Order, and relieves the Panel of its burden of proving such facts;

d. Respondent is knowingly and voluntarily giving up the right to present a defense by oral and documentary evidence and to cross-examine witnesses who would testify on behalf of the Panel; and

e. Respondent is knowingly and voluntarily waiving the right to seek judicial review of this Order.

FACTUAL BASIS

6. Respondent specifically admits and the Panel finds that:

a. On or about August 22, 2009, in the state of California, Respondent was charged with spousal battery, false imprisonment, reckless driving, intimidation, attempted obstruction and willful harm to a child. Respondent was subsequently convicted of spousal battery.

b. On or about October 23, 2009, Respondent was charged with resisting arrest, but the charge was eventually dismissed.

c. On or about December 20, 2011, Respondent was charged with domestic violence, but the charge was eventually dismissed.

d. On or about January 19, 2013, February 8, 2013, February 13, 2013 and February 16, 2013, Respondent was charged with violation of a restraining Order, but the charges were eventually dismissed.

e. Respondent failed to report any of his charges, arrests or convictions to the Board.

f. From approximately March 11, 2013 through March 15, 2015 Respondent worked at the Sterling Regional Medical Center in Colorado as a locum tenens physician radiologist. Respondent was released from his position on March 15, 2013 because of alleged inaccuracies in radiology reports and reports of inappropriate behavior. Respondent failed to report this adverse action to the Board.

g. On October 14, 2014, the Board ordered Respondent to undergo an evaluation by the Colorado Physician Health Program ("CPHP").

h. Respondent has a physical or mental illness or condition that renders Respondent unable to perform a medical service with reasonable skill and with safety to patients in the absence of treatment monitoring.

i. On or about March 11, 2013, at the Sterling Regional Medical Center, Respondent interpreted a bilateral screening mammogram on patient H.S. as a benign mammogram.

j. Respondent did not compare the finding of asymmetric areas of non-specific increased opacity present on H.S.'s March 11, 2013 mammogram to previous studies to ascertain if the opacity was new or had increased since previous studies.

k. On or about March 11, 2013, Respondent interpreted a bilateral screening mammogram on patient J.S. as normal.

l. Given the focal nature of and the degree of density of the area of increased opacity revealed on the March 11, 2013 mammogram for J.S., additional imaging should have been advised.

m. On or about March 13, 2013, Respondent interpreted a lower extremity venous ultrasound on patient F.V. as involving a nonocclusive clot in the left SFV, popliteal and posterior vein.

n. The March 13, 2013 study for patient F.V. revealed an occlusive thrombus in the left leg deep venous system.

o. On or about March 14, 2013, Respondent interpreted an angiogram of the abdomen and pelvis on patient P.T. as "lungs are clear, with no infiltrate or consolidation, the heart is enlarged, diffuse osteopenia and cement in the T12 and L1 vertebral bodies."

p. The March 14, 2013 study for patient P.T. revealed compression deformities at T8, T9 and T11, which Respondent failed to report.

q. On or about March 13, 2013, Respondent interpreted a CT angiogram of the abdomen and pelvis on patient J.K. as an aortic stent graft without endo or exoleak.

r. The March 13, 2013 images for patient C.T. reveal a 4.4cm fusiform, infrarenal abdominal aortic aneurysm, rather than an aortic stent graft as described by Respondent. The images also reveal mild ectasia of both common iliac arteries, as well as a focal atherosclerotic stenosis in the distal right common iliac artery, a focal stenosis at the origin of the left renal artery, a mild stenosis of the origin of the superior mesenteric artery with slight post-stenotic dilation, a retroaortic left renal vein, a few tiny cysts in the left lobe of the liver, cysts in the inferior left kidney and an enlarged prostate gland, none of which are described by Respondent.

s. The medical care provided by Respondent to patients H.S., J.S., F.V., P.T. and J.K. was substandard.

7. Respondent admits and the Panel finds that the conduct set forth above constitutes unprofessional conduct as defined in Section 12-36-117(1)(o), (p), and (y), C.R.S., which state:

(1) "Unprofessional conduct" as used in this article means:

(o) Failing to notify the board, as required by section 12-36-118.5(1), of a physical or mental illness or condition that impacts the licensee's ability to perform a medical service with reasonable skill and with safety to patients, failing to act within the limitations created by a physical or mental illness or condition that renders the licensee unable to perform a medical service with reasonable skill and with safety to the patient, or failing to comply with the limitations agreed to under a confidential agreement entered pursuant to section 12-36-118.5.

(p) Any act or omission which fails to meet generally accepted standards of medical practice.

(y) Failing to report to the board, within thirty days after an adverse action, that an adverse action has been taken against the licensee by another licensing agency in another state or country, a peer review body, a health care institution, a professional or medical society or association, a governmental agency, a law enforcement agency, or a court for acts or conduct that would constitute grounds for disciplinary or adverse action as described in this article.

8. Based upon the above, the Parties agree and stipulate that the terms of this Order are authorized by Section 12-36-118(5)(g)(III), C.R.S.

LETTER OF ADMONITION

9. This provision shall constitute a Letter of Admonition as set forth in Sections 12-36-118(4)(c)(III)(A) and 12-36-118(5)(g)(III), C.R.S. Respondent is hereby admonished for the acts and omissions described in the factual basis above.

10. By entering this Order, Respondent agrees to waive the rights provided by Section 12-36-118(4)(c)(III)(B), C.R.S., to contest this Letter of Admonition.

PROBATIONARY TERMS

11. Respondent's license to practice medicine is hereby placed on probation for five (5) years commencing on the effective date of this Order. All terms of probation shall be effective throughout the probationary period and shall constitute terms of this Order.

12. During the probationary period, Respondent agrees to be bound by the terms and conditions set forth below.

PRACTICE RESTRICTIONS

13. Respondent shall not practice medicine as a solo practitioner and/or in any setting where Respondent is the sole physician. Respondent shall not practice as a locum tenens physician in any setting.

14. Upon successful completion of three (3) years of probation, Respondent may petition the Board for modification of this restriction provided that Respondent's treatment providers have determined that he no longer has any physical or mental disability making any such restriction necessary and that Respondent is able to provide written documentation in support of modification of this restriction by both CPHP and CPEP. The Panel may choose to grant the request, may choose to deny the request, or may choose to grant the request subject to specific terms and conditions including, but not limited to, additional assessment, training, and/or supervision. Respondent specifically acknowledges that the Panel's decision regarding a request to modify the practice restriction shall be in the sole discretion of the Panel and shall not be subject to review by any court, hearings panel or any other entity.

HOURLY PRACTICE RESTRICTION

15. Respondent may provide medical care to patients only at such times that he is physically able to function as a physician. Respondent's work hours shall not exceed forty (40) hours per week.

16. Respondent may petition the Panel for modification of this restriction provided that Respondent submits a written report from CPHP as to CPHP's opinion from a medical and psychiatric perspective that Respondent is safe to practice medicine with reasonable skill and safety without an hourly restriction. The Panel may choose to grant the request, may choose to deny the request, or may choose to grant the request subject to specific terms and conditions including, but not limited to, additional assessment, training, and/or supervision. Respondent specifically acknowledges that the Panel's decision regarding a request to modify the practice restriction shall be in the sole discretion of the Panel and shall not be subject to review by any court, hearings panel or any other entity.

TREATMENT MONITORING

17. During the probationary period, Respondent shall receive such treatment as is determined to be appropriate by CPHP. All instructions and recommendations to Respondent by CPHP shall constitute terms of this Order, and Respondent must comply with any such instructions and recommendations. Failure to comply with such instructions and recommendations shall constitute a violation of this Order. CPHP shall also function as the "treatment monitor" as that term is used in this Order.

18. Within 30 days of the effective date of this Order, Respondent shall sign any and all releases necessary to allow CPHP to communicate with the Panel. Within 60 days of the effective date of this Order, Respondent shall provide the Panel with a copy of such releases. This information may include alcohol and drug abuse treatment program records that may be confidential under federal or state law. Respondent shall update any and all releases as often as may reasonably be required to allow the Panel access to Respondent's privileged or confidential information. Respondent shall not revoke such releases prior to successful completion of the probationary period as set forth in this Order. Any failure to execute such a release, failure to provide copies to the Panel, or any premature revocation of such a release shall constitute a violation of this Order. In the event Respondent revokes such release, CPHP may, because of confidentiality concerns, refuse to acknowledge Respondent's participation in CPHP. CPHP's refusal to acknowledge Respondent's participation with that organization shall constitute a violation of this Order.

19. Respondent shall also complete any and all unrestricted releases as are necessary to permit CPHP to disclose to the Panel information generated by other sources. Respondent authorizes the Panel to re-disclose and make public, consistent with Board Policy 30-9, information obtained from CPHP necessary for the limited purposes of enforcing this Order, seeking sanctions for noncompliance with this Order, or other purposes authorized in the Medical Practice Act. Medical records shall not become public records by virtue of such use. Any failure to execute such a release, failure to provide copies to the Panel, or any premature revocation of such a release shall constitute a violation of this Order.

20. CPHP's treatment monitoring activities shall constitute ongoing examinations of Respondent for the purpose of Section 12-36-118(9)(a), C.R.S. Respondent's failure to comply with CPHP's instructions and recommendations shall have the full force and effect of a violation of an order pursuant to Section 12-36-118(9)(a), C.R.S., and subject Respondent to action pursuant to Sections 12-36-118(5)(g)(IV) and 12-36-118(9)(a), C.R.S.

21. Respondent shall ensure that CPHP submits quarterly written reports to the Panel. The reports shall briefly describe CPHP's ongoing examinations and treatment monitoring of Respondent. The reports shall also state whether Respondent is in compliance with this Order. If at any time CPHP has reasonable cause to believe that Respondent has violated the terms of this Order, is unable to practice with reasonable skill and with safety to patients or has committed unprofessional conduct as defined in Section 12-36-117(1), C.R.S., CPHP shall immediately inform the Panel.

22. CPHP's treatment monitoring instructions and recommendations shall constitute terms of this Order for so long as this Order remains in effect. Nothing in this agreement shall limit the ability of CPHP to impose any other instruction or recommendation as part of its treatment monitoring of Respondent.

23. If at any time, CPHP believes that any of the above terms are no longer necessary, CPHP may relax the terms as it deems appropriate and, at CPHP's direction, the Respondent may comply with this Order as determined by CPHP. CPHP shall inform the Panel of any such action relaxing the above terms in its quarterly report. All such reports shall be reviewed by the Board's staff and, at the staff's discretion, may be reviewed by the Panel. Following receipt and review of such a quarterly report, the Panel reserves the right to reject and nullify CPHP's decision regarding the relaxing of such terms. If the Panel nullifies CPHP's decision regarding the relaxing of any of the above terms, the Respondent specifically agrees to comply with the Order as set forth above in accordance with the Panel's directions.

24. It is the responsibility of the Respondent to provide information to CPHP in a timely and complete manner and to assure that all CPHP written reports are timely transmitted to the Panel.

TERMINATION OF TREATMENT MONITORING

25. After successful completion of five (5) years of monitoring by CPHP, including any time CPHP has monitored Respondent prior to the effective date of this Order, Respondent may petition the panel to terminate the Treatment Monitoring terms set forth in this Order. With any request, Respondent must provide the Panel with a report from CPHP finding Respondent safe to practice with skill and safety to patients. The Parties agree that the Panel's decision regarding such a petition shall be made at the sole discretion of the Panel. Respondent hereby waives any right to appeal the Panel's decision on this issue. The Parties agree that any decision the Panel may make to terminate treatment monitoring will not also terminate the probationary period.

CPEP EDUCATION PROGRAM

26. Within 30 days of the effective date of this Order, Respondent shall contact CPEP to schedule a competence assessment ("CPEP Assessment"). Respondent shall complete and review the CPEP Assessment within 120 days of the effective date of this Order.

27. The CPEP Assessment will determine whether CPEP recommends that Respondent undergo any education intervention plan or other remedial education or training program. Hereinafter, the term "Education Program" shall refer to any education intervention plan or other remedial education or training program recommended by CPEP, including the "Post-Education Evaluation" component.

28. If the CPEP Assessment indicates Respondent should undergo an Education Program, Respondent shall enroll in the recommended Education Program within 180 days of the effective date of this Order. If the CPEP Assessment indicates that Respondent need not undergo any Education Program,

Respondent shall be deemed to have satisfied fully the CPEP Education Program requirement of this Order.

29. Respondent shall timely commence and successfully complete any CPEP recommended Education Program including the Post-Education Evaluation component, within the time required by CPEP. However, the Respondent shall have no more than two years from the effective date of this Order to complete the entire CPEP Education Program unless the Panel determines, in its discretion, that more time is necessary. Any delay in Respondent's completion of the recommended Education Program, including the post-education evaluation, will delay the Respondent's successful completion of the probationary period.

30. Respondent understands and acknowledges that in order to complete the Education Program successfully, the Respondent must demonstrate to CPEP and the Panel's satisfaction that the Respondent has satisfactorily accomplished all CPEP Education Program objectives and has integrated this learning into Respondent's medical practice.

31. Within 30 days of the effective date of this Order, Respondent shall sign any and all releases necessary to allow CPEP to communicate with the Panel. Within 60 days of the effective date of this Order, Respondent shall provide the Panel with a copy of such releases. Respondent shall not revoke such releases prior to successful completion of the probationary period as set forth in this Order. Any failure to execute such a release, failure to provide copies to the Panel, or any revocation of such a release shall constitute a violation of this Order.

32. Respondent shall provide or cause CPEP to provide a copy of the Assessment Report, Education Plan and any other reports regarding the Respondent's participation in the Education Program to the Panel within 30 days of the report's completion.

33. Respondent shall ensure that all reports from CPEP are complete and timely submitted to the Board. Respondent understands that the Board may accept a report, reject a report, refer the matter for additional disciplinary proceedings or take any further action authorized by law.

34. Respondent shall provide the Panel with written proof from CPEP upon successful completion of the recommended Education Program, including successful completion of the Post-Education Evaluation as defined above.

35. The Parties acknowledge that most CPEP Assessments include a computer-based cognitive function screening test. If CPEP determines that Respondent's results on the cognitive function screen suggest the need for further neuropsychological testing, the Respondent shall directly notify or ensure that CPEP notifies the Panel of such a determination. The Panel may, in its discretion, order

Respondent to undergo a comprehensive neuropsychological examination with its peer assistance, or other delegated provider, pursuant to an Order or other written instruction of the Panel. The Respondent understands and agrees to undergo neuropsychological examination as directed by the Panel.

36. All CPEP recommendations and instructions shall constitute terms of this Order. Respondent shall comply with all CPEP recommendations and instructions within the time periods set out by CPEP and the Panel. Respondent's failure to comply with CPEP recommendations and instructions shall constitute a violation of this Order.

TOLLING OF THE PROBATIONARY PERIOD

37. If at any time, Respondent ceases the active clinical practice of medicine, defined for the purposes of this Order as evaluating or treating a minimum of five patients per month, the probationary period shall be tolled for the time the Order is in effect and Respondent is not engaged in the active clinical practice of medicine.

38. Respondent must comply with all other terms of the Order and all other terms of probation. Unless otherwise specified, all terms of the Order and all terms of probation shall remain in effect, regardless of whether the probationary period has been tolled, from the effective date of this Order until probation is terminated. The probationary period shall be tolled for any time Respondent is not in compliance with any term of this Order.

OUT OF STATE PRACTICE

39. Respondent may wish to leave Colorado and practice in another state. At any time other than during a period of suspension imposed by this Order, and whether to practice out of state or for any other reason, Respondent may request, in writing, that the Board place Respondent's License on inactive status as set forth in Section 12-36-137, C.R.S. Respondent's request to place his License on inactive status must include written evidence that Respondent has reported this Order to all other jurisdictions in which Respondent is licensed, as required by the "Other Terms" section of this Order. Upon the approval of such request, Respondent may cease to comply with the terms of this Order. Failure to comply with the terms of this Order while inactive shall not constitute a violation of this Order. While inactive, Respondent shall not perform any act in the state of Colorado that constitutes the practice of medicine, nor shall Respondent perform any act in any other jurisdiction pursuant to the authority of a license to practice medicine granted by the state of Colorado. Unless Respondent's License is inactive, Respondent must comply with all terms of this Order, irrespective of Respondent's location. The probationary period will be tolled for any period of time Respondent's License is inactive.

40. Respondent may resume the active practice of medicine at any time pursuant to written request and as set forth in Section 12-36-137(5), C.R.S. With such written request, Respondent shall cause CPHP to perform an updated evaluation of

Respondent. Respondent shall be permitted to resume the active practice of medicine only after approval of the treatment monitor, and only after submission of and approval of an updated evaluation from CPHP.

TERMINATION OF PROBATION

41. Upon the expiration of the probationary period, Respondent may submit a written request for restoration of Respondent's License to unrestricted status. If Respondent has complied with the terms of probation, and if Respondent's probationary period has not been tolled, such release shall be granted by the Panel in the form of written notice.

OTHER TERMS

42. The terms of this Order were mutually negotiated and determined.

43. Both Parties acknowledge that they understand the legal consequences of this Order; both Parties enter into this Order voluntarily; and both Parties agree that no term or condition of this Order is unconscionable.

44. All costs and expenses incurred by Respondent to comply with this Order shall be the sole responsibility of Respondent, and shall in no way be the obligation of the Board or Panel.

45. If Respondent is licensed by any other jurisdiction, Respondent shall report this Order to all other jurisdictions in which Respondent is licensed.

46. During the probationary period or any period in which a physician is subject to prescribing restrictions, no physician shall perform an assessment of a patient's medical history and current medical condition, including a personal physical examination, for the purpose of concluding that a patient may benefit from the use of medical marijuana, recommending the use of medical marijuana or certifying a debilitating medical condition for an applicant to the Colorado Medical Marijuana Program. Respondent hereby understands and agrees that he shall not certify to the state health agency that a patient has a debilitating medical condition or that the patient may benefit from the use of medical marijuana.

47. Respondent shall obey all state and federal laws while the terms of this Order are in effect.

48. So that the Board may notify hospitals of this agreement pursuant to Section 12-36-118(13), C.R.S., Respondent presently holds privileges at or is employed by the following hospitals and facilities:

ND COLORADO PRIVILEGES

49. This Order and all its terms shall have the same force and effect as an order entered after a formal disciplinary hearing pursuant to Section 12-36-118(5)(g)(III), C.R.S., except that it may not be appealed. Failure to comply with the terms of this Order may be sanctioned by the Inquiry Panel as set forth in Section 12-36-118(5)(g)(IV), C.R.S. This Order and all its terms also constitute a valid board order for purposes of Section 12-36-117(1)(u), C.R.S.

50. This Order shall be admissible as evidence at any proceeding or future hearing before the Board.

51. Invalidation of any portion of this Order by judgment or court order shall in no way affect any other provision, which shall remain in full force and effect.

52. During the pendency of any action arising out of this Order, the terms of this Order shall be deemed to be in full force and effect and shall not be tolled.

53. Respondent acknowledges that the Panel may choose not to accept the terms of this Agreement and that if the Agreement is not approved by the Panel and signed by a Panel member or other authorized person, it is void.

54. This Order shall be effective upon (a) mailing by first-class mail to Respondent at Respondent's address of record with the Board, or (b) service by electronic means on Respondent at Respondent's electronic address of record with the Board. Respondent hereby consents to service by electronic means if Respondent has an electronic address on file with the Board.

55. Upon becoming effective, this Order shall be open to public inspection and shall be publicized pursuant to the Board's standard policies and procedures. This Order constitutes discipline against Respondent's License. Additionally, this Order shall be reported the Federation of State Medical Boards, the National Practitioner Data Bank, and as otherwise required by law.

JEFFREY DOUGLAS LOVIN, M.D.

THE FOREGOING was acknowledged before me this ____ day of

_____, 2016, by Jeffrey Douglas Lovin, M.D., in the County of

_____, State of _____.

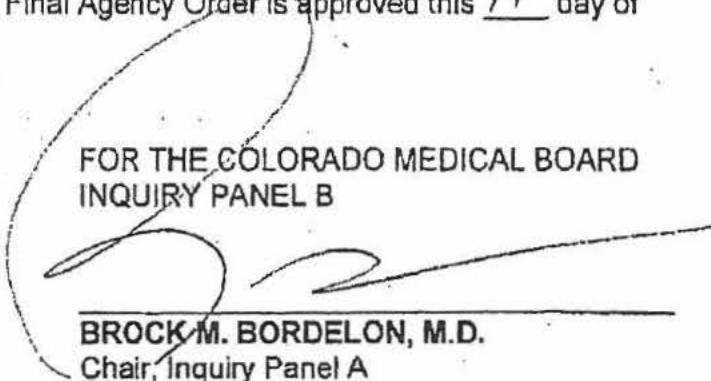
NOTARY PUBLIC

My commission expires

THE FOREGOING Stipulation and Final Agency Order is approved this 14th day of

July, 2016.

FOR THE COLORADO MEDICAL BOARD
INQUIRY PANEL B


BROCK M. BORDELON, M.D.
Chair, Inquiry Panel A

THE FOREGOING Stipulation and Final Agency Order is effective upon service
to Respondent, on July 14, 2016.

Jeffrey Douglas Lovin
JEFFREY DOUGLAS LOVIN, M.D.

THE FOREGOING was acknowledged before me this ____ day of
____, 2016, by Jeffrey Douglas Lovin, M.D., in the County of
____, State of ____.

fm NP

See attached California All-Purpose
Certified of Acknowledgement
dated 6/16/16, stamped and
signed by Melissa M. Ekin
Notary Public.

NOTARY PUBLIC

My commission expires

THE FOREGOING Stipulation and Final Agency Order is approved this ____ day of
____, 2016.

FOR THE COLORADO MEDICAL BOARD
INQUIRY PANEL B

BROCK M. BORDELON, M.D.
Chair, Inquiry Panel A

THE FOREGOING Stipulation and Final Agency Order is effective upon service
to Respondent, on July 14, 2016.

See attached →

CALIFORNIA ALL-PURPOSE CERTIFICATE OF ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)

County of Riverside

On 06/16/2016 before me, Kimberly Martinez Notary Public

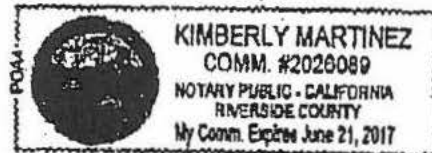
personally appeared Jeffrey Douglas Lovin
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Kimberly Martinez
Notary Public Signature

(Notary Public Seal)



ADDITIONAL OPTIONAL INFORMATION

DESCRIPTION OF THE ATTACHED DOCUMENT

Stipulation and Final

(Title or description of attached document)

Agency Order

(Title or description of attached document continues)

Number of Pages Document Date

CAPACITY CLAIMED BY THE SIGNER

- ☐ Individual (s)
☐ Corporate Officer

(Title)

- ☐ Partner(s)
☐ Attorney-in-Fact
☐ Trustee(s)
☐ Other

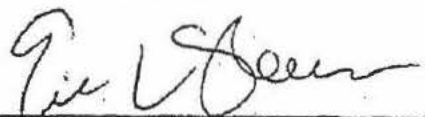
INSTRUCTIONS FOR COMPLETING THIS FORM

This form complies with current California statutes regarding notary wording and, if needed, should be completed and attached to the document. Acknowledgments from other states may be completed for documents being sent to that state as long as the wording does not require the California notary to violate California notary law.

- State and County information must be the State and County where the document signer(s) personally appeared before the notary public for acknowledgment.
- Date of notarization must be the date that the signer(s) personally appeared which must also be the same date the acknowledgment is completed.
- The notary public must print his or her name as it appears within his or her commission followed by a comma and then your title (notary public).
- Print the name(s) of document signer(s) who personally appear at the time of notarization.
- Indicate the correct singular or plural forms by crossing off incorrect forms (i.e. he/she/they is/are) or circling the correct forms. Failure to correctly indicate this information may lead to rejection of document recording.
- The notary seal impression must be clear and photographically reproducible. Impression must not cover text or lines. If seal impression smudges, re-seal if a sufficient area permits, otherwise complete a different acknowledgment form.
- Signature of the notary public must match the signature on file with the office of the county clerk.
 - ◊ Additional information is not required but could help to ensure this acknowledgment is not misused or attached to a different document.
 - ◊ Indicate title or type of attached document, number of pages and date.
 - ◊ Indicate the capacity claimed by the signer. If the claimed capacity is a corporate officer, indicate the title (i.e. CEO, CFO, Secretary).
- Securely attach this document to the signed document with a staple.

APPROVED AS TO FORM

FOR RESPONDENT



Eric L. Steiner, M.D., J.D.,
Gerash Steiner
1775 Sherman Street, Suite 1650
Denver, Colorado 80203



George Gedulin (SBN277660)
Law Office of George Gedulin
12636 High Bluff Drive, Suite 400
San Diego, CA 92130
Ph. 858-333-5231
Fax: 858-519-5671

FILED

2018 OCT 15 PM 1:38

CLERK SUPERIOR COURT
SAN DIEGO COUNTY, CA

ATTORNEY FOR PETITIONER, [REDACTED]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO CENTRAL DIVISION**

IN RE MATTER OF

Case No.:

[REDACTED]
Petitioner,

**DECLARATION OF [REDACTED]
[REDACTED] IN SUPPORT OF REQUEST
FOR DOMESTIC VIOLENCE
RESTRAINING ORDER**

vs.

Jeffrey D. Lovin,

DATE:

18FDV04704C

TIME:

801: RODRIGUEZ, LISA

Respondent.

DEPT.:

I, [REDACTED], declare and say as follows:

If called before the Court to testify I would testify to the following facts of which I have personal knowledge.

BACKGROUND

1. The respondent and I used to have a dating relationship. This started approximately five years ago in 2013. I formally ended the relationship in the middle of 2018.
2. Below is a description and timeline of events which have led me to seek a restraining order. I am in fear that respondent will continue to contact, stalk and harass me by any means unless I have the protections of a Court order.

///

DECLARATION OF [REDACTED] IN SUPPORT OF DVRO REQUEST

RECENT INCIDENTS OF ABUSE

3. On or about **October 7, 2018** the respondent trespassed onto my property at approximately 2AM. [REDACTED] who was in our home at the time heard a noise outside and went out to confront what was happening.
4. The details of the events are contained in the declaration of [REDACTED] He identifies the respondent as the individual who was on our lawn and could recognize him from previous interactions with the respondent.
5. There have been multiple instances in the past months since I ended my relationship with the respondent that there has been sounds of individuals entering my property through a gate, rustling and shuffling noises in my yard.
6. This trespassing has come after I made a very clear statement to Respondent that I did not want to see or be contacted by him again.
7. Throughout the summer of 2018 respondent has repeatedly called and texted me on a daily basis. Sometimes I would receive 20-30 calls in a row or 50 text messages.
8. On August 15, 16, 17 and 28th I received over 130 text messages from the Respondent.
9. Usually these messages would come late at night and into midnight or 1AM.
10. I sent respondent a very clear and unequivocal message on **8/28/18** via text that I did not want to have any contact with him ever again. (Exhibit-1) The messages stated:

"I waited til you had time to get home. I have repeatedly made it very clear to you that I don't want to be with you. I don't want to date you. I don't want to talk to you. I don't want to communicate in anyway with you. Stay away from me. Stay away from my family. Stay away from my home. Stay away from my jobs. I have been advised to obtain a restraining order. I have warned you over and over that I will get a restraining order if you do not leave me alone and now you give me no choice. If you or any of your representatives or friends have any kind of contact with any of my family members or come to my home or my job or anywhere else I will call the police."

1 *Why do you not leave me alone? Why do you insist on me having to have*
2 *a restraining order to leave me alone? I have kindly ask you over and over*
3 *and over again!! I have purposely hid my home, my work, my mother and*
4 *my family members from you for a reason. I fear for my life, my career and*
5 *for my family. My [REDACTED] has a weak heart and already had a heart attack*
6 *and you found her and showed up at her home and scared her even*
7 *though you know she has a weak heart! And you're a doctor! I have been*
8 *running from you for years i've been way too nice! Way way too nice!. You*
9 *need to move on! I am moving on. Stay away from me and my family. My*
10 *entire family is now aware of the situation. They will not talk to you. They*
11 *will call the police. You are stalking me and harrassing me. Don't leave*
12 *coffee and flowers for me. Don't knock on my door."*

13 11. The respondent did not honor my request and continued to contact me via phone calls
14 and as described above come snooping around my home at night several times.

15 12. Respondent has hired Private Investigators to follow me and observe my home. As
16 recently as **October 9, 2018** [REDACTED] was being followed and videoed by someone as he
17 drove my BMW.

18 13. On **10/11/2018** at 1:22am Respondent called my phone from what turned out to be a
19 Temecula hotel phone number. [REDACTED] lives in that area and I feared it may be a call
20 about her. I answered the phone and it was the respondent, he started talking, I told him
21 not to contact me and I hung up. He called again at 6:33am and left a message that he
22 was staying at Ponte Winery.

23 14. On **10/12/2018** I got a call from Monarch Beach resort at 2am and did not answer. On
24 **10/13/2018** at 10pm I got a call from the same resort and the same number. I answered
25 the call to confirm that it was the respondent calling. Once I had confirmed it was him I
26 handed the phone to my boyfriend Frank. I was in the same room as Frank when he
27 stated on the phone "do you know who this is" at which point the call ended.

28 15. On **October 9, 2018** and again on **October 13, 2018** I received two text messages from
 respondents "mentor" Dr. Birnberg conveying messages to me from respondent.

(Exhibit-3) Respondent was offering me \$50,000 to pay for my school loans if I would talk to him and also that the respondent had bought me an \$80,000 ring from Tiffany's.

16. In a text message sent to me on 10/6/2018 respondent admits to hiring a private investigator (Exhibit-2), he stated in his message:

"My dearest [REDACTED] I love you with all my heart. I have worked hard w Dr Balinth n even harder with Fred. Fred helped me make a major breakthrough n I finally understand the demon inside me was Hugh. I had channeled my father n acted foolishly doing the very things I despised most about him. Like him, I was overwhelmed by attachment n had not fully understood love. Like him, I limited social experience n friendships, even tho I was lonely. And like him, I allowed cheapness to overwhelm my generosity. I see now that it is more important to love the person rather than act from need or reflex. Foolish me, I was lucky to have met the most beautiful, kind, giving n caring woman I have ever encountered in my life. And the specter of Hugh my father overwhelmed my heart n my judgement. I did goggle [REDACTED] n dropped off coffee.

I did have a pi in a white car drive by your house but realized I was wrong, I loved you no matter what, n I fired him. I did not drive by your house a second time as [REDACTED] thought, as I was in VV the entire time. I did not hire a woman drive a highly visible obvious car. Even I am not quite that stupid. I promise you I will not embarrass you, your family, or friends again. I have fired Allen as an advisor n have placed 4plex n ranch on market. My intent is to pay off Durango as you advised. Should I ever thru some miracle to be lucky enough to regain your love, I will put you on title as co owner. I know that I have a great deal of negativity to overcome even to be blessed with your friendship,. All I ask at this point, given all we have shared, is that we can at least intermittently talk or text.

I love you with all my heart, Jeff"

17. On September 30, 2018 Respondent used a third party [REDACTED] to send me a letter via email. I have not included a copy of the letter at this point as I wish to avoid publishing every detail of our past relationship at this time. Despite my clear message to him on August 28th not to be contacted, he was having third parties contact me with his words talking about our relationship and asking to me to reconsider our relationship.

18. Respondent continues to this day to contact me despite my repeated requests for it to stop. He is capable of trespassing on my property without regard for my rights or wishes. I am daily in fear of him or how he may again try to stalk or harass me.

RESPONDENT'S CRIMINAL HISTORY AND MEDICAL LICENSING PROBATIONS

19. Respondent is a medical doctor who has both a criminal history and disciplinary record with the California and Colorado Medical Board.

20. Respondent's criminal history includes the following:

- a. August 22, 2009 respondent was charged with spousal battery, false imprisonment, reckless driving, intimidation, attempted obstruction and willful harm to a child. Respondent was convicted of spousal battery.
- b. October 23, 2009 and December 20, 2011 respondent was charged with resisting arrest and domestic battery respectively, charges were dismissed in both cases.
- c. On 1/19/2013, 2/18/2013, 2/13/2018 and 2/16/2018 Respondent was charged with violating a restraining order, charges dismissed.
- d. Respondent was put on probation and restriction by the Colorado Medical Board for failure to report any of his charges, arrests or convictions to the board while still practicing medicine. (Exhibit-4)
- e. In 2017 the California Medical Licensing Board took action against Mr. Lovin's license and imposed probation and restrictions on him as a result of his conduct in Colorado. (Exhibit-4)

1 21. I told the Respondent multiple times that if he did not leave me alone I would seek a
2 restraining order. I have no other way to protect myself from his harassment and endless
3 attempts to interject himself into my life.

4 22. I am asking that [REDACTED] be included in the protective order. Respondent was able to
5 find [REDACTED] address using Google, he came to her home at 6AM and brought
6 coffee. This was another attempt to contact me through a third party and get back into
7 my life. Respondent admits to this action in his 10/6/18 text (Exhibit-2).

8 I declare under penalty of perjury under the laws of the state of California that the above is
9 true and correct.
10

11
12 Electronic
Signature

13 Date: 10/15/2018 12:30:58 PM PDT

14
15 DocuSigned by:

16 By: [REDACTED]
CE7DCAE2B8CC487

17 [REDACTED]
18 Petitioner
19
20
21
22
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24
25
26
27
28

George Gedulin (SBN277660)
Law Office of George Gedulin
12636 High Bluff Drive, Suite 400
San Diego, CA 92130
Ph. 858-333-5231
Fax: 858-519-5671

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2018 OCT 15 PM 1:37

CLERK SUPERIOR COURT
SAN DIEGO COUNTY, CA

ATTORNEY FOR PETITIONER, [REDACTED]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO CENTRAL DIVISION**

IN RE MATTER OF

Case No.:

[REDACTED]
Petitioner,

DECLARATION OF [REDACTED]
[REDACTED]

vs.

DATE:

18FDV04704C
801: RODRIGUEZ, LISA

TIME:

DEPT.:

Jeffrey D. Lovin,

Respondent.

I, [REDACTED] declare and say as follows:

If called before the Court to testify I would testify to the following facts of which I have personal knowledge.

1:50am - Sunday October 7, 2018

I was finishing up cleaning my room after I had just taken a friend home around 1:05am. After returning home I preceded to do a few things. I went to the restroom in the downstairs bathroom by the laundry. I was going to wash my hands in the bathroom but felt that I was supposed to wash my hands in the kitchen sink. So I did.

///

///

///

DECLARATION OF [REDACTED]

1:58am - Sunday

I preceded to wash my hands in the kitchen sink when I heard what sounded like a 'crash' or 'boom'. I thought to myself the stalker is trying to get through the gate. Immediately I was in fear of my safety and was happy [REDACTED] was not home to be in danger. My guess is he entered into the backyard through scaling the fence and jumping on the roof. He then messed up the satellite wires while jumping on or off the trash cans to get in the backyard and to leave the backyard. I guess he was trying to look into the house through the backyard windows/kitchen to find [REDACTED] and to see what she was doing. I quickly ran to the front door just to make sure that it was locked; as I was quite creeped out by the whole thing, and secure in case of a break-in. I peered through the 'spy hole' in the front door and saw a person; and shadow, move behind the pillar (direct in view of the neighbors house next door.)

I or [REDACTED] has never stated/shared/invited/consented/nor agreed for Jeff Douglas Lovin to know where we live nor enter our property.

2:01 - 2:04am - Sunday

I then quickly opened my front (right side) of the door to only find the human shadow of the stalker/trespasser being projected onto the brown fence (just to the left of the pillar). With an increased heart rate and frustrated and authoritative tone I said; "who the F*ck is there?", "Who the f*ck are you?", "Why are you trespassing on my property?", "If you don't leave my property now, I will be forced to call the Cops and have you thrown in jail." I continued to make the following statements. "Why are you following [REDACTED]", "Why are you putting [REDACTED] through so much?", "Not only are you messing with [REDACTED], and disrespecting me, but you are messing with GOD." "You continue to disrespect [REDACTED] and follow her and stalk her."

1 "I have had so many cars in front of my house lately; watching my house. I know everything and
2 it's going to stop."

3
4 I continually asked **Jeff Douglas Lovin** to step out from the pillar and show his face. I
5 said, "You have the balls to trespass on my property and come to my house and stalk [REDACTED]
6 but you don't have the balls to look and me in the face so that I can take your picture and send it
7 to the cops.
8

9
10 I said, "I know you are sad, confused, and angry but this doesn't give you ANY right to
11 do what you have been doing to [REDACTED]. Not only are you messing with [REDACTED]; you are
12 messing with me and you are messing with God. Mark my words, this is a warning; not from me,
13 but from God. If you do not cease your actions, you will have to answer to God for the wrong
14 things you are doing and the law will not be on your side."
15

16
17 I then slammed the door and looked through the 'spy hole' to witness **Jeff Douglas**
18 **Lovin** come out of hiding. I could clearly see the right side of his face and back of his head. I
19 then saw **Jeff Douglas Lovin** jump the neighbors tan fence and run towards a parked SUV about
20 60 feet away. (I could tell this was **Jeff Douglas Lovin** by his missing frail hair and a
21 dark/black jacket with red color on the collar.) I very quickly ran upstairs to get my phone so
22 that I could get some photos or video of **Jeff Douglas Lovin** and his vehicle as possible
23 evidence. I ran back out the door full speed to catch up with **Jeff Douglas Lovin** while he was
24 attempting a 'get away' from trespassing on my property and a was only able to take 2 photos of
25 **Jeff Douglas Lovin** racing away from my home. I was completely in fear of my safety and felt
26
27
28

scared and threatened by this person's actions during this whole confrontation. I'm glad [REDACTED]
[REDACTED] was away at this time and safe at another location.

I then preceded to return to my home to lock the front door, run upstairs and grab my keys/wallet and then back downstairs to put my shoes on, open the garage, and put my car out of the garage; in attempt to follow and get video of the stalker and trespasser **Jeff Douglas Lovin**. I was unsuccessful in retrieving that information from my phone camera that I wanted. I wasn't able to get clear HD photos/video from my phone. However, I did take two blurry photos at the time of my chasing the criminal.

4:10pm - Sunday

I obtained a surveillance video from a local neighbor; who had an HD security video system, of **Jeff Douglas Lovin** driving away from my house after trespassing. This video obtained shows **Jeff Douglas Lovin** driving away from the scene in a SUV type vehicle. In the top left corner of the video you can see me [REDACTED] taking photos with my phone (photos included), wiping off my socks of rocks, and running back to my house.

I declare under penalty of perjury under the laws of the state of California that the above is true and correct.

Date: 10/15/2018 11:42:54 AM PDT

[REDACTED] Electronic Signature
DocuSigned by:
[REDACTED]
By: 690AFE9E32C641F...
[REDACTED]

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): George Gedulin, SBN 277660 Law Office of George Gedulin 12636 High Bluff Drive, Suite 400 TELEPHONE NO.: 858-333-5231 FAX NO. (Optional): 858-519-5671 EMAIL ADDRESS (Optional): george@gedulinlaw.com ATTORNEY FOR (Name) [REDACTED]		FOR COURT USE ONLY FILED 2018 OCT 15 PM 1:30 CLERK-SUPERIOR COURT SAN DIEGO COUNTY, CA 18FDV04704C 801: RODRIGUEZ, LISA
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO ☒ CENTRAL DIVISION, CENTRAL COURTHOUSE, 1100 UNION ST., SAN DIEGO, CA 92101 ☐ CENTRAL DIVISION, COUNTY COURTHOUSE, 220 W. BROADWAY, SAN DIEGO, CA 92101 ☐ CENTRAL DIVISION, FAMILY COURT, 1555 6TH AVE., SAN DIEGO, CA 92101 ☐ EAST COUNTY DIVISION, 250 E. MAIN ST., EL CAJON, CA 92020 ☐ NORTH COUNTY DIVISION, 325 S. MELROSE DR., VISTA, CA 92081 ☐ SOUTH COUNTY DIVISION, 500 3RD AVE., CHULA VISTA, CA 91910		
PETITIONER(S) [REDACTED]		
RESPONDENT(S) Jeffrey D. Lovin		
OTHER		
FAMILY LAW CERTIFICATE OF ASSIGNMENT-VENUE DECLARATION		

INSTRUCTIONS: In order for the court to assign your case to the proper court location, this venue declaration is required when an individual files a new family law case, including domestic violence cases. For active cases with the Family Support Division (FSD), filed by the Department of Child Support Services, this venue declaration must be submitted with the first papers filed by a party requesting custody or visitation orders after both parents have become parties to the FSD case, or when a party files a request for domestic violence restraining orders.

SANCTIONS: Notice is hereby given that knowingly or purposefully filing a case in the improper venue is good cause for imposing monetary sanctions.

I (type or print name), [REDACTED], declare that this action is filed in the proper venue within the County of San Diego based on the type of case and the applicable residential Zip Code in accordance with the Code of Civil Procedure §§ 395(a), 402, the California Rules of Court, and the San Diego Superior Court Rules.

(Check one)

- ☒ Petitioner resides in the County of San Diego within Zip Code [REDACTED]
- ☐ Respondent resides in the County of San Diego within Zip Code _____
- ☐ In the FSD case, the party requesting custody, visitation, or domestic violence restraining orders resides in the County of San Diego within Zip Code _____
- ☐ In the FSD case, the other parent resides in the County of San Diego within Zip Code _____
- ☐ Other (specify-include type of case and venue statute) _____

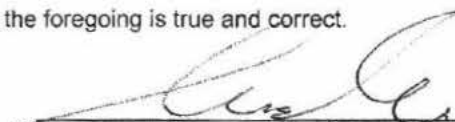
The Zip Code stated above is within the filing boundaries of the family court location marked below, according to the Zip Code List of the San Diego Superior Court (SDSC Form #ADM-254).

(Check one)

- ☒ Central Division (1100 Union St.; 1555 6th Ave.; 1409 4th Ave.; and 220 W. Broadway, San Diego, CA 92101)
- ☐ South County Division (500 3rd Ave., Chula Vista, CA 91910)
- ☐ East County Division (250 E. Main St., El Cajon, CA 92020)
- ☐ North County Division (325 S. Melrose Dr., Vista, CA 92081)

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 10-15-18


 Signature of Party or Attorney