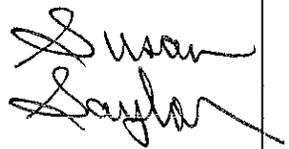


1 KAMALA D. HARRIS  
Attorney General of California  
2 JANICE K. LACHMAN  
Supervising Deputy Attorney General  
3 ANAHITA S. CRAWFORD  
Deputy Attorney General  
4 State Bar No. 209545  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 322-8311  
Facsimile: (916) 327-8643  
7 *Attorneys for Complainant*

**FILED**

Date 2/19/16 By 

8 **BEFORE THE**  
9 **STRUCTURAL PEST CONTROL BOARD**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2016-42

13 **GREGORY MARCO ALWARD**  
14 **P.O. Box 3181**  
**Rancho Cordova, CA 95670**

**ACCUSATION**

15 **Field Representative License No. FR 12865**

16 Respondent.

17  
18 Susan Saylor ("Complainant") alleges:

19 **PARTIES**

20 1. Complainant brings this Accusation solely in her official capacity as the  
21 Registrar/Executive Officer of the Structural Pest Control Board ("Board"), Department of  
22 Consumer Affairs.

23 2. On or about March 8, 1985, the Board issued Field Representative License Number  
24 FR 12865 to Gregory Marco Alward ("Respondent"). The license was in full force and effect at  
25 all times relevant to the charges brought herein and will expire on June 30, 2017, unless renewed.

26 **JURISDICTION**

27 3. Business and Professions Code ("Code") section 8620 provides, in pertinent part, that  
28 the Board may suspend or revoke a license when it finds that the holder, while a licensee or

1 applicant, has committed any acts or omissions constituting cause for disciplinary action or in lieu  
2 of a suspension may assess a civil penalty.

3 4. Code section 8625 states:

4 The lapsing or suspension of a license or company registration by operation of  
5 law or by order or decision of the board or a court of law, or the voluntary surrender  
6 of a license or company registration shall not deprive the board of jurisdiction to  
7 proceed with any investigation of or action or disciplinary proceeding against such  
licensee or company, or to render a decision suspending or revoking such license or  
registration.

#### 8 STATUTORY PROVISIONS

9 5. Code section 8649 states:

10 Conviction of a crime substantially related to the qualifications, functions, and  
11 duties of a structural pest control operator, field representative, applicator, or  
registered company is a ground for disciplinary action. The certified record of  
conviction shall be conclusive evidence thereof.

#### 12 COST RECOVERY

13 6. Code section 125.3 provides, in pertinent part, that the Registrar may request the  
14 administrative law judge to direct a licentiate found to have committed a violation or violations of  
15 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
16 enforcement of the case.

#### 17 FIRST CAUSE FOR DISCIPLINE

##### 18 (Conviction of Crimes)

19 7. Respondent is subject to discipline under Code section 8649, in that Respondent was  
20 convicted of the following crimes that are substantially related to the qualifications, functions, or  
21 duties of a field representative:

22 a. On or about October 28, 2015, in the case of *People v. Gregory Marco Alward*,  
23 (Super. Ct. Sacramento County, 2015, Case No.15M14068), Respondent was convicted by the  
24 Court on his plea of nolo contendere of violating Penal Code section 484(a) (petty theft), a  
25 misdemeanor. The circumstances of the crime were that on or about October 23, 2015,  
26 Respondent unlawfully stole, took, and carried away the personal property of another, to wit:  
27 Target.

28 ///



1 and any licensee which employs, elects, or associates Respondent shall be subject to disciplinary  
2 action.

3 **PRAYER**

4 **WHEREFORE**, Complainant requests that a hearing be held on the matters herein alleged,  
5 and that following the hearing, the Structural Pest Control Board issue a decision:

6 1. Revoking or suspending Field Representative's License Number FR 12865, issued to  
7 Gregory Marco Alward;

8 2. Revoking or suspending any other license issued to Gregory Marco Alward;

9 3. Prohibiting Gregory Marco Alward from serving as an officer, director, associate,  
10 partner, qualifying manager or responsible managing employee of any registered company during  
11 the period that discipline is imposed on Field Representative's License Number FR 12865, issued  
12 to Gregory Marco Alward;

13 4. Ordering Gregory Marco Alward to pay the Structural Pest Control Board the  
14 reasonable costs of the investigation and enforcement of this case, pursuant to Business and  
15 Professions Code section 125.3; and,

16 5. Taking such other and further action as deemed necessary and proper.

17  
18 DATED: 2/19/16



SUSAN SAYLOR  
Registrar/Executive Officer  
Structural Pest Control Board  
Department of Consumer Affairs  
State of California  
*Complainant*

22 SA2015105414  
23 12119932.doc