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FILED

Date 11/17/11

By William H. Douglas

7
8 **BEFORE THE**
STRUCTURAL PEST CONTROL BOARD
9 **DEPARTMENT OF PESTICIDE REGULATION**
STATE OF CALIFORNIA

10 In the Matter of the Statement of Issues
11 Against:

Case No. 2012-24

STATEMENT OF ISSUES

12 **CESAR RAYMUNDO LARA**
13 **BUG STOP SERVICES**
14 **330 E. 220th Street**
Carson, California 90745

15 Respondent.

16 William H. Douglas ("Complainant") alleges:

17 **PARTIES**

18 1. Complainant brings this Statement of Issues solely in his official capacity as the
19 Interim Registrar/Executive Officer of the Structural Pest Control Board ("Board"), Department
20 of Pesticide Regulation.

21 **APPLICATION INFORMATION**

22 2. On or about September 15, 2010, the Board received an Application for Registration
23 of Company to upgrade Bug Stop Services, Inc. to include Branch 3 from Cesar Raymundo Lara
24 ("Respondent"). On or about September 9, 2010, Respondent certified under penalty of perjury to
25 the truthfulness of all statements, answers, and representations in the application. The Board
26 denied the application on January 25, 2011.

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LICENSE INFORMATION

Bug Stop Services, Inc. - Company Registration Certificate No. PR 5687

3. On or about October 2, 2008, the Board issued Company Registration Certificate Number PR 5687 in Branch 2 to Bug Stop Services, Inc., with Michael Rodriguez as the President and Sinclair Jones as the Qualifying Manager. Sinclair Jones passed away. On or about February 9, 2009, the registration was suspended for failing to have a Qualifying Manager. On or about July 8, 2009, Cesar Raymundo Lara became the Qualifying Manager. On or about August 30, 2010, Respondent Lara became the President, John Griffin became the Secretary, and Soledad Lara became the Vice President.

Cesar Raymundo Lara

Operator's License No. 11879

4. On or about July 2, 2009, the Board issued Operator's License Number OPR 11879 in Branch 2 to Respondent an employee of Rapid Pest Solutions, Inc. On or about July 6, 2009, Respondent left the employ of Rapid Pest Solutions, Inc. On or about July 8, 2009, Respondent became the Qualifying Manager of Bug Stop Services, Inc. On or about September 16, 2009, Respondent became the Qualifying Manager for Pro Central Termite Control in Branch 2. On or about August 30, 2010, Respondent became the President of Bug Stop Services, Inc. The license will expire on June 30, 2012, unless renewed.

Field Representative's License No. FR 38391

5. On or about March 29, 2005, the Board issued Field Representative's License Number FR 38391 in Branch 2 to Respondent as an employee of Dewey Pest Control. On or about June 10, 2008, the license was upgraded to include Branch 3. On or about February 18, 2009, the license was upgraded to include Branch 1, and Respondent became employed with Master Fume, Inc. On or about March 5, 2009, Respondent became employed with Rapid Pest Solutions, Inc. The license will expire on June 30, 2013, unless renewed.

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1 **STATUTORY PROVISIONS**

2 6. Business and Professions Code ("Code") section 8568 provides, in pertinent part,
3 that the Board may deny a license or registration if the applicant has committed any act or
4 omissions constituting grounds for discipline under Code section 480.

5 7. Code section 480 states, in pertinent part:

6 (a) A board may deny a license regulated by this code on the grounds that
7 the applicant has one of the following:

8 (2) Done any act involving dishonesty, fraud, or deceit with the intent to
substantially benefit himself or herself or another, or substantially injure another.

9 (3)(A) Done any act that if done by a licentiate of the business or
10 profession in question, would be grounds for suspension or revocation of license.

11 8. Code section 8654 states:

12 Any individual who has been denied a license for any of the reasons
13 specified in Section 8568, or who has had his or her license revoked, or whose license
14 is under suspension, or who has failed to renew his or her license while it was under
15 suspension, or who has been a member, officer, director, associate, qualifying
16 manager, or responsible managing employee of any partnership, corporation, firm, or
17 association whose application for a company registration has been denied for any of
18 the reasons specified in Section 8568, or whose company registration has been
19 revoked as a result of disciplinary action, or whose company registration is under
suspension, and while acting as such member, officer, director, associate, qualifying
20 manager, or responsible managing employee had knowledge of or participated in any
of the prohibited acts for which the license or registration was denied, suspended or
21 revoked, shall be prohibited from serving as an officer, director, associate, partner,
22 qualifying manager, or responsible managing employee of a registered company, and
23 the employment, election or association of such person by a registered company is a
24 ground for disciplinary action.

25 **BACKGROUND INFORMATION**

26 9. On or about July 2, 2009, the Board issued Operator's License Number OPR
27 11879 in Branch 2 to Respondent. On or about July 8, 2009, Respondent became the Qualifying
28 Manager of Bug Stop Services, Inc. On or about August 8, 2011, the Board filed Accusation No.
2012-6, alleging that Respondent, while the Qualifying Manager for Bug Stop Services, Inc.
violated Code section 8651, as more particularly set forth below in paragraph 10.

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3. Revoking or suspending any other license for which Cesar Raymundo Lara is
furnishing the qualifying experience or appearance; and,

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

DATED: 11/17/11

William H. Douglas
WILLIAM H. DOUGLAS
Interim Registrar/Executive Officer
Structural Pest Control Board
Department of Pesticide Regulation
State of California
Complainant

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