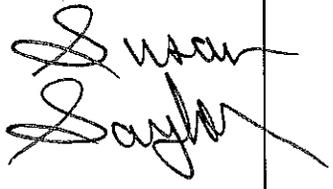


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FILED

Date 9/15/15 By



**BEFORE THE
STRUCTURAL PEST CONTROL BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. 2016-17

ARMANDO E. SERRANO
1517 Bailey Drive
Fairfield, CA 94533

ACCUSATION

**Field Representative License No. FR 42338,
Branch 2**

Respondent.

Complainant alleges:

PARTIES

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

2. On or about September 26, 2007, the Board issued Field Representative License Number FR 42338, Branch 2 to Armando E. Serrano (Respondent). The Field Representative License was in full force and effect at all times relevant to the charges brought herein and will expire on June 30, 2016, unless renewed.

3. On or about January 30, 2004, the Board issued Applicator License Number RA 41298, Branches 2 and 3 to Respondent. The Applicator License was canceled on January 30, 2010.

1 disciplinary action under section 8641 of the code.

2 "..."

3 **COST RECOVERY**

4 9. Code section 125.3 states, in pertinent part, that a Board may request the
5 administrative law judge to direct a licentiate found to have committed a violation or violations of
6 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
7 enforcement of the case.

8 **FACTS**

9 10. On or about June 5, 2013, Respondent certified, under penalty of perjury, on his Field
10 Representative License Renewal Application that he had completed the 16 hours of continuing
11 education required for renewal of his license.

12 11. In or about 2014, the Board selected Respondent for a continuing education audit,
13 covering July 1, 2010 through June 30, 2013.

14 12. On five separate occasions, the Board contacted Respondent requesting proof of
15 course completion to verify his continuing education hours.

16 13. Respondent never responded to the Board's requests and did not submit proof of
17 completing the continuing education hours.

18 **FIRST CAUSE FOR DISCIPLINE**

19 (Failed to Submit Proof of Continuing Education)

20 14. Respondent is subject to disciplinary action under Code section 8593, and/or 8641 and
21 California Code of Regulations, title 16, section 1950, subdivision (a), in that, as described in
22 paragraphs 10-13, Respondent failed to submit proof of continuing education.

23 **SECOND CAUSE FOR DISCIPLINE**

24 (Violation of Continuing Education Requirement)

25 15. Respondent is subject to disciplinary action under Code section 8641 and California
26 Code of Regulations, title 16, section 1950, subdivision (a) in that, as described in paragraphs 10-
27 13, Respondent failed to comply with the continuing education requirement when he failed to
28 submit proof of continuing education.

