

1 KAMALA D. HARRIS
Attorney General of California
2 GLORIA A. BARRIOS
Supervising Deputy Attorney General
3 KIMBERLEE D. KING
Deputy Attorney General
4 State Bar No. 141813
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 897-2581
6 Facsimile: (213) 897-2804
Attorneys for Complainant
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9 **BEFORE THE**
STRUCTURAL PEST CONTROL BOARD
10 **DEPARTMENT OF PESTICIDE REGULATION**
STATE OF CALIFORNIA
11

12 In the Matter of the Accusation Against:
13
14 **ERNIE ROMERO, AKA ERNESTO JESUS**
ROMERO
15 **3005 Main Street, Suite 204**
Santa Monica, CA 90405
16 **Field Representative's License No. FR 43047**
17 Respondent.

Case No. 2012-8

OAH No. L-2012010015

STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER

18
19 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
20 entitled proceedings that the following matters are true:

21 PARTIES

22 1. William H. Douglas (Complainant) is the Interim Registrar/Executive Officer of the
23 Structural Pest Control Board. He brought this action solely in his official capacity and is
24 represented in this matter by Kamala D. Harris, Attorney General of the State of California, by
25 Kimberlee D. King, Deputy Attorney General.

26 2. Respondent Ernie Romero, aka Ernesto Jesus Romero (Respondent) is represented in
27 this proceeding by attorney Scott Harris, Esq., whose address is: S J Harris Law
28 8383 Wilshire Boulevard, Suite 830, Beverly Hills, California 90211.

1 CULPABILITY

2 9. Respondent admits the truth of each and every charge and allegation in Accusation
3 No. 2012-8.

4 10. Respondent agrees that his Field Representative's License is subject to discipline and
5 he agrees to be bound by the Board's probationary terms as set forth in the Disciplinary Order
6 below.

7 CONTINGENCY

8 11. This stipulation shall be subject to approval by the Structural Pest Control Board.
9 Respondent understands and agrees that counsel for Complainant and the staff of the Structural
10 Pest Control Board may communicate directly with the Board regarding this stipulation and
11 settlement, without notice to or participation by Respondent or his counsel. By signing the
12 stipulation, Respondent understands and agrees that he may not withdraw his agreement or seek
13 to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails
14 to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Disciplinary
15 Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal
16 action between the parties, and the Board shall not be disqualified from further action by having
17 considered this matter.

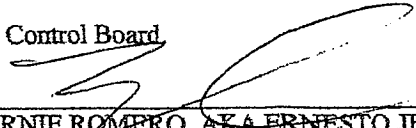
18 12. The parties understand and agree that facsimile copies of this Stipulated Settlement
19 and Disciplinary Order, including facsimile signatures thereto, shall have the same force and
20 effect as the originals.

21 13. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an
22 integrated writing representing the complete, final, and exclusive embodiment of their agreement.
23 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
24 negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary
25 Order may not be altered, amended, modified, supplemented, or otherwise changed except by a
26 writing executed by an authorized representative of each of the parties.

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1 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the
2 Decision and Order of the Structural Pest Control Board.

3 DATED: 5/16/12 
4 ERNIE ROMERO, AKA ERNESTO JESUS
5 ROMERO
6 Respondent

7 I have read and fully discussed with Respondent Ernie Romero, aka Ernesto Jesus Romero
8 the terms and conditions and other matters contained in the above Stipulated Settlement and
9 Disciplinary Order. I approve its form and content.

10 DATED: 5/19/2012 
11 Scott Harris, Esq.
12 Attorney for Respondent

13 ENDORSEMENT

14 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
15 submitted for consideration by the Structural Pest Control Board of the Department of Pesticide
16 Regulation.

17 Dated: Respectfully submitted,
18 KAMALA D. HARRIS
19 Attorney General of California
20 GLORIA A. BARRIOS
21 Supervising Deputy Attorney General

22 KIMBERLEE D. KING
23 Deputy Attorney General
24 *Attorneys for Complainant*

25
26 LA2011500565
27 Stipulation.rtf

28

1 Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the
2 Decision and Order of the Structural Pest Control Board.

3 DATED: _____
4 ERNIE ROMERO, AKA ERNESTO JESUS
5 ROMERO
6 Respondent

7 I have read and fully discussed with Respondent Ernie Romero, aka Ernesto Jesus Romero
8 the terms and conditions and other matters contained in the above Stipulated Settlement and
9 Disciplinary Order. I approve its form and content.

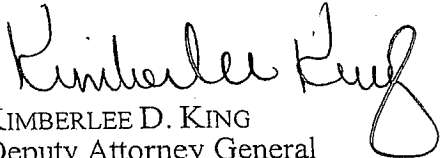
10 DATED: _____
11 Scott Harris, Esq.
12 Attorney for Respondent

13 ENDORSEMENT

14 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully
15 submitted for consideration by the Structural Pest Control Board of the Department of Pesticide
16 Regulation.

17
18 Dated: May 24, 2012

Respectfully submitted,
KAMALA D. HARRIS
Attorney General of California
GLORIA A. BARRIOS
Supervising Deputy Attorney General

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23 KIMBERLEE D. KING
24 Deputy Attorney General
25 *Attorneys for Complainant*

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BEFORE THE
STRUCTURAL PEST CONTROL BOARD
DEPARTMENT OF PESTICIDE REGULATION
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

ERNIE ROMERO, AKA ERNESTO JESUS
ROMERO
3005 Main Street, Suite 204
Santa Monica, CA 90405
Field Representative's License No. FR 43047

Respondent.

Case No. 2012-8


OAH No. L-2012010015

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the Structural Pest Control Board, Department of Pesticide Regulation, as its Decision in this matter.

This Decision shall become effective on November 30, 2012.

It is so ORDERED October 31, 2012.



FOR THE STRUCTURAL PEST CONTROL
BOARD
DEPARTMENT OF PESTICIDE REGULATION