

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

In the Matter of the Accusation Against:

Case No. 2015-24

MARY E. NUNO

3240 Eagle Peak Court
Stockton, CA 95212
Field Representative No. FR 44550

Respondent.

DECISION AND ORDER

The attached Stipulated Surrender of License and Order is hereby adopted by the Structural Pest Control Board, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on April 26, 2015.

It is so ORDERED March 27, 2015.



FOR THE STRUCTURAL PEST CONTROL BOARD
DEPARTMENT OF CONSUMER AFFAIRS

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

11 In the Matter of the Accusation Against:

Case No. 2015-24

12 **MARY E. NUNO**

13 **3240 Eagle Peak Court**
14 **Stockton, CA 95212**
15 **Field Representative License No. FR 44550**

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

16 Respondent.

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

20 PARTIES

21 1. Susan Saylor (Complainant) is the Registrar/Executive Officer of the Structural Pest
22 Control Board. She brought this action solely in her official capacity and is represented in this
23 matter by Kamala D. Harris, Attorney General of the State of California, by David E. Brice,
24 Deputy Attorney General.

25 2. Mary E. Nuno (Respondent) is representing herself in this proceeding and has chosen
26 not to exercise her right to be represented by counsel.

27 3. On or about July 20, 2009, the Structural Pest Control Board issued Field
28 Representative License No. FR 44550 to Mary E. Nuno (Respondent). The Field Representative

1 License was in full force and effect at all times relevant to the charges brought in Accusation No.
2 2015-24 and will expire on June 30, 2015, unless renewed.

3 JURISDICTION

4 4. Accusation No. 2015-24 was filed before the Structural Pest Control Board (Board),
5 Department of Consumer Affairs, and is currently pending against Respondent. The Accusation
6 and all other statutorily required documents were properly served on Respondent on November 3,
7 2014. Respondent timely contacted counsel for Complainant and stated her intention to surrender
8 her license. A copy of Accusation No. 2015-24 is attached as Exhibit A and incorporated by
9 reference.

10 ADVISEMENT AND WAIVERS

11 5. Respondent has carefully read, and understands the charges and allegations in
12 Accusation No. 2015-24. Respondent also has carefully read, and understands the effects of this
13 Stipulated Surrender of License and Order.

14 6. Respondent is fully aware of her legal rights in this matter, including the right to a
15 hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at
16 her own expense; the right to confront and cross-examine the witnesses against her; the right to
17 present evidence and to testify on her own behalf; the right to the issuance of subpoenas to
18 compel the attendance of witnesses and the production of documents; the right to reconsideration
19 and court review of an adverse decision; and all other rights accorded by the California
20 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 admits the truth of each and every charge and allegation in Accusation
25 No. 2015-24, agrees that cause exists for discipline and hereby surrenders her Field
26 Representative License (No. FR 44550) for the Board's formal acceptance.

27 9. Respondent understands that by signing this stipulation she enables the Board to issue
28 an order accepting the surrender of her Field Representative License without further process.

ORDER

IT IS HEREBY ORDERED that Field Representative License No. FR 44550, issued to Respondent Mary E. Nuno, is surrendered and accepted by the Structural Pest Control Board.

1. The surrender of Respondent's Field Representative License and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against Respondent. This stipulation constitutes a record of the discipline and shall become a part of Respondent's license history with the Structural Pest Control Board.

2. Respondent shall lose all rights and privileges as a licensed Field Representative in California as of the effective date of the Board's Decision and Order.

3. Respondent shall cause to be delivered to the Board her pocket license and, if one was issued, her wall certificate on or before the effective date of the Decision and Order.


4. If Respondent ever applies for licensure or petitions for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked license in effect at the time the petition is filed, and all of the charges and allegations contained in Accusation No. 2015-24 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

5. Respondent shall pay the agency its costs of investigation and enforcement in the amount of \$477.50 prior to issuance of a new or reinstated license.

ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my Field Representative License. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Structural Pest Control Board.

DATED: 1-20-15


MARY E. NUNO
Respondent

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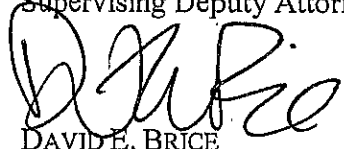
ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Structural Pest Control Board of the Department of Consumer Affairs.

Dated: 2/18/2015

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
KENT D. HARRIS
Supervising Deputy Attorney General



DAVID E. BRICE
Deputy Attorney General
Attorneys for Complainant

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