

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

In the Matter of the Accusation Against:

Case No. 2016-22

**JOHN KEITH SCOBLE**  
5300 Silver Strand Way  
Sacramento, CA 95841

Field Representative License No. FR 46126

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 August 19, 2016.

It is so ORDERED July 20, 2016.

  
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FOR THE STRUCTURAL PEST CONTROL BOARD  
DEPARTMENT OF CONSUMER AFFAIRS

1 KAMALA D. HARRIS  
Attorney General of California  
2 JANICE K. LACHMAN  
Supervising Deputy Attorney General  
3 BRIAN S. TURNER  
Deputy Attorney General  
4 State Bar No. 108991  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 445-0603  
Facsimile: (916) 327-8643  
7 E-mail: Brian.Turner@doj.ca.gov  
*Attorneys for Complainant*

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

11 In the Matter of the Accusation Against:

Case No. 2016-22

12 **JOHN KEITH SCOBLE**  
13 **5300 Silver Strand Way**  
14 **Sacramento, CA 95841**

15 **Field Representative License No. FR 46126**

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

16 Respondent.

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18 **IT IS STIPULATED AND AGREED** by and between the parties to the above-entitled  
19 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 (Board). She brought this action solely in her official capacity and is represented  
23 in this matter by Kamala D. Harris, Attorney General of the State of California, by Brian S.  
24 Turner, Deputy Attorney General.

25 2. John Keith Scoble (Respondent) is representing himself in this proceeding and has  
26 chosen not to exercise his right to be represented by counsel.

27 3. On or about November 2, 2010, the Board issued Field Representative License No.  
28 FR 46126 to John Keith Scoble (Respondent). The Field Representative License was in full force

1 and effect at all times relevant to the charges brought in Accusation No. 2016-22 and will expire  
2 on June 30, 2016, unless renewed.

3 4. On or about April 30, 2010, the Board issued Applicator License No. RA 50871 to  
4 John Keith Scoble. The Applicator License was in full force and effect at all times relevant to  
5 the charges brought in Accusation No. 2016-22 and will expire on June 30, 2016, unless renewed.

6 **JURISDICTION**

7 5. Accusation No. 2016-22 was filed before the Board, Department of Consumer  
8 Affairs, and is currently pending against Respondent. The Accusation and all other statutorily  
9 required documents were properly served on Respondent on November 6, 2015. Respondent  
10 timely filed his Notice of Defense contesting the Accusation. A copy of Accusation No. 2016-22  
11 is attached as Exhibit A and incorporated by reference.

12 **ADVISEMENT AND WAIVERS**

13 6. Respondent has carefully read, and understands the charges and allegations in  
14 Accusation No. 2016-22. Respondent also has carefully read, and understands the effects of this  
15 Stipulated Surrender of License and Order.

16 7. Respondent is fully aware of his legal rights in this matter, including the right to a  
17 hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at  
18 his own expense; the right to confront and cross-examine the witnesses against him; the right to  
19 present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel  
20 the attendance of witnesses and the production of documents; the right to reconsideration and  
21 court review of an adverse decision; and all other rights accorded by the California  
22 Administrative Procedure Act and other applicable laws.

23 8. Respondent voluntarily, knowingly, and intelligently waives and gives up each and  
24 every right set forth above.

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1 CULPABILITY

2 9. Respondent admits the truth of each and every charge and allegation in Accusation  
3 No. 2016-22, agrees that cause exists for discipline and hereby surrenders his Field  
4 Representative License No. FR 46126 for the Board's formal acceptance.

5 In consideration of the Board's forbearance to pursue further disciplinary action against  
6 Respondent's Applicator's License and to avoid further costs of enforcement in pursuing that  
7 matter, Respondent surrenders his Applicator's License No. RA 50871 for the Board's formal  
8 acceptance.

9 10. Respondent understands that by signing this stipulation he enables the Board to issue  
10 an order accepting the surrender of his Field Representative License and Applicator License  
11 without further process.

12 CONTINGENCY

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

22 12. The parties understand and agree that Portable Document Format (PDF) and facsimile  
23 copies of this Stipulated Surrender of License and Order, including Portable Document Format  
24 (PDF) and facsimile signatures thereto, shall have the same force and effect as the originals.

25 13. This Stipulated Surrender of License and Order is intended by the parties to be an  
26 integrated writing representing the complete, final, and exclusive embodiment of their agreement.  
27 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,  
28 negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order

1 may not be altered, amended, modified, supplemented, or otherwise changed except by a writing  
2 executed by an authorized representative of each of the parties.

3 14. In consideration of the foregoing admissions and stipulations, the parties agree that  
4 the Board may, without further notice or formal proceeding, issue and enter the following Order:

5 **ORDER**

6 **IT IS ORDERED** that Field Representative License No. FR 46126, and Applicator License  
7 No. RA 50871 issued to Respondent John Keith Scoble, are surrendered and accepted by the  
8 Structural Pest Control Board.

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

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

15 3. Respondent shall cause to be delivered to the Board his pocket licenses and, if  
16 issued, any and all wall certificates on or before the effective date of the Decision and Order.

17 4. If he ever applies for licensure or petitions for reinstatement in the State of California,  
18 the Board shall treat it as a new application(s) for licensure. Respondent must comply with all the  
19 laws, regulations and procedures for licensure in effect at the time the application or petition is  
20 filed, and all of the charges and allegations contained in Accusation No. 2016-22 shall be deemed  
21 to be true, correct and admitted by Respondent when the Board determines whether to grant or  
22 deny the application or petition.

23 5. Respondent shall pay the agency its costs of investigation and enforcement in the  
24 amount of \$2,225.00 prior to issuance of new or reinstated license(s).

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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, and Applicator 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: May 17, 2016 J. Keith Scoble  
JOHN KEITH SCOBLE  
Respondent

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: 5/17/16

Respectfully submitted,  
KAMALA D. HARRIS  
Attorney General of California  
JANICE K. LACHMAN  
Supervising Deputy Attorney General

Brian S. Turner  
BRIAN S. TURNER  
Deputy Attorney General  
Attorneys for Complainant

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