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FILED

Date 3/14/12 By William H. Douglas

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

In the Matter of the Accusation Against: **IAM-US, Inc. dba INTEGRATED ASSET MANAGEMENT, MOORE GREENBERG, CHIEF EXECUTIVE OFFICER/QUALIFYING MANAGER** **12031 Ventura Boulevard, Ste. #4** **Studio City, California 91604** **-and-** **12501 Burbank Blvd., Ste. #200,** **Valley Village, Ca, 91607** **Company Registration Certificate No. PR 5786, Br. 3** **and** **MOORE GREENBERG** **12031 Ventura Boulevard, Ste. #4** **Studio City, California 91604** **Operator's License No. OPR 11050, Br. 3** **and** **KRIS STANLEY CRUDUP** **12031 Ventura Boulevard, Ste. #4** **Studio City, California 91604** **Operator's License No. OPR 8172, Br. 2 and 3** Respondents.	Case No. 2012-43 **ACCUSATION**

Complainant alleges:

PARTIES

1. William H. Douglas ("Complainant") brings this Accusation solely in his official capacity as the Interim Registrar/Executive Officer of the Structural Pest Control Board ("Board"), Department of Pesticide Regulation.

IAM-US, Inc. dba Integrated Asset Management

2. On or about March 9, 2009, the Board issued Company Registration Certificate Number PR 5786 in Branch 3 (termite) to IAM-US, Inc. dba International Asset Management, with Moore Greenberg ("Respondent Greenberg" or "Greenberg"), as Chief Executive Officer and Qualifying Manager. On or about August 24, 2009, the business name was changed to IAM-US, Inc dba Integrated Asset Management ("Respondent Integrated" or "Integrated Asset Management").

Moore Greenberg

3. On or about March 11, 2005, the Board issued Operator's License Number OPR 11050 in Branch 3 to Respondent Greenberg. On or about March 9, 2009, Respondent Greenberg became the Branch 3 Qualifying Manager of Respondent Integrated Asset Management. On or about April 12, 2011, Respondent Greenberg disassociated as Branch 3 Qualifying Manager of Respondent Integrated Asset Management. On or about August 9, 2011, Respondent Greenberg became the Branch 3 Qualifying Manager of Respondent Integrated Asset Management. Respondent's operator's license is currently in effect and renewed through June 30, 2013.

Kris Stanley Crudup

4. On or about June 23, 1988, the Board issued Operator's License Number OPR 8172 in Branch 2 to Respondent Kris Stanley Crudup, ("Respondent Crudup" or "Crudup"). On or about September 6, 1994, Operator's License Number OPR 8172 was upgraded to include Branches 2 and 3. On or about April 12, 2011, Respondent Crudup became the Branch 2 and 3 Qualifying Manager of Respondent Integrated Asset Management. On or about July 25, 2011, Respondent Crudup disassociated as Branch 2 and 3 Qualifying Manager of Respondent

Integrated Asset Management. Respondent's operator's license is currently in effect and renewed through June 30, 2014.

JURISDICTION

5. Business and Professions Code ("Code") section 8620 provides, in pertinent part, that the Board may suspend or revoke a license when it finds that the holder, while a licensee or applicant, has committed any acts or omissions constituting cause for disciplinary action or in lieu of a suspension may assess a civil penalty.

6. Code section 8625 states:

> The lapsing or suspension of a license or company registration by operation of law or by order or decision of the board or a court of law, or the voluntary surrender of a license or company registration shall not deprive the board of jurisdiction to proceed with any investigation of or action or disciplinary proceeding against such licensee or company, or to render a decision suspending or revoking such license or registration.

7. Code section 8624 states, in pertinent part:

> . . . .
>
> If the operator is the qualifying manager, a partner, responsible officer, or owner of a registered structural pest control company, the suspension or revocation may be applied to the company registration.
>
> The performance by any partnership, corporation, firm, association, or registered company of any act or omission constituting a cause for disciplinary action, likewise constitutes a cause for disciplinary action against any licensee who, at the time the act or omission occurred, was the qualifying manager, a partner, responsible officer, or owner of the partnership, corporation, firm, association, or registered company whether or not he or she had knowledge of, or participated in, the prohibited act or omission.

8. Code section 8654 states:

> Any individual who has been denied a license for any of the reasons specified in Section 8568, or who has had his or her license revoked, or whose license is under suspension, or who has failed to renew his or her license while it was under suspension, or who has been a member, officer, director, associate, qualifying manager, or responsible managing employee of any partnership, corporation, firm, or association whose application for a company registration has been denied for any of the reasons specified in Section 8568, or whose company registration has been revoked as a result of disciplinary action, or whose company registration is under suspension, and while acting as such member, officer, director, associate, qualifying 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 revoked, shall be prohibited from serving as an officer, director, associate, partner, qualifying manager, or responsible managing employee of a registered company, and

the employment, election or association of such person by a registered company is a ground for disciplinary action.

STATUTORY AND REGULATORY PROVISIONS

(Statutory Provisions)

9. Code section 8514 states, in pertinent part:

No registered company shall commence work on a contract, or sign, issue, or deliver any documents expressing an opinion or statement relating to the control of household pests, or wood destroying pests or organisms until an inspection has been made.

. . . .

A registered company shall not subcontract structural fumigation work, as permitted in this section, without the written consent of the consumer. The consumer must be informed in advance, in writing, of any proposed work which the registered company intends to subcontract and of the consumer's right to select another person or entity of the consumer's choosing to perform the work. The consumer may authorize the subcontracting of the work as proposed or may contract directly with another registered company licensed to perform the work. Nothing in this paragraph shall be construed to eliminate any otherwise applicable licensure requirements, nor permit a licensed contractor to perform any work beyond that authorized by Section 8556.

. . . .

Subcontracting of work, as permitted herein, shall not relieve the prime contractor or the subcontractor from responsibility for, or from disciplinary action because of, an act or omission on its part, which would otherwise be a ground for disciplinary action. However, the registered company making the initial proposal including proposed work that the registered company intends to subcontract shall not be subject to disciplinary action or otherwise responsible for an act or omission in the performance of the work that the consumer directly contracts with another registered company to perform, as permitted by this section.

10. Code section 8516 states, in pertinent part:

. . . .

(b) No registered company or licensee shall commence work on a

contract, or sign, issue, or deliver any documents expressing an opinion or statement relating to the absence or presence of wood destroying pests or organisms until an inspection has been made by a licensed Branch 3 field representative or operator. The address of each property inspected or upon which work is completed shall be reported on a form prescribed by the board and shall be filed with the board no later than 10 business days after the commencement of an inspection or upon completed work.

. . . .

A written inspection report conforming to this section and a form approved by the board shall be prepared and delivered to the person requesting the inspection or to the person's designated agent within 10 business days of the inspection, except that an inspection report prepared for use by an attorney for litigation purposes is not required to be reported to the board. The report shall be delivered before work is commenced on any property. The registered company shall retain for three years all original inspection reports, field notes, and activity forms.

Reports shall be made available for inspection and reproduction to the executive officer of the board or his or her duly authorized representative during business hours. Original inspection reports or copies thereof shall be submitted to the board upon request within two business days. The following shall be set forth in the report:

. . . .

(6) A foundation diagram or sketch of the structure or structures or portions of the structure or structures inspected, indicating thereon the approximate location of any infested or infected areas evident, and the parts of the structure where conditions that would ordinarily subject those parts to attack by wood destroying pests or organisms exist.

(7) Information regarding the substructure, foundation walls and footings, porches, patios and steps, air vents, abutments, attic spaces, roof framing that includes the eaves, rafters, fascias, exposed timbers, exposed sheathing, ceiling joists, and attic walls, or other parts subject to attack by wood destroying pests or organisms. Conditions usually deemed likely to lead to infestation or infection, such as earth-to-wood contacts, excessive cellulose debris, faulty grade levels, excessive moisture conditions, evidence of roof leaks, and insufficient ventilation are to be reported.

. . . .

(10) Recommendations for corrective measures . . .

11. Code section 8518 states, in pertinent part:

When a registered company completes work under a contract, it shall prepare, on a form prescribed by the board, a notice of work completed and not completed, and shall furnish that notice to the owner of the property or the owner's agent within 10 working days after completing the work. The notice shall include a statement of the cost of the completed work and estimated cost of work not completed.

. . . .

Notices of work completed and not completed shall be made available for inspection and reproduction to the executive officer of the board or his or her duly authorized representative during business hours. Original notices of work completed or not completed or copies thereof shall be submitted to the board upon request within two business days.

12. Code section 8519 states, in pertinent part:

Certification as used in this section means a written statement by the registered company attesting to the statement contained therein relating to the absence or presence of wood-destroying pests or organisms and, listing such recommendations, if any, which appear on an inspection report prepared pursuant to Section 8516, and which relate to (1) infestation or infection of wood-destroying pests or organisms found, or (2) repair of structurally weakened members caused by such infestation or infection, and which recommendations have not been completed at the time of certification.

Any registered company which makes an inspection report pursuant to Section 8516, shall, if requested by the person ordering the inspection report, prepare and deliver to that person or his or her designated agent, a certification, to provide:

. . . .

(b) When the inspection report prepared pursuant to Section 8516 discloses infestation or infection and the notice of work completed prepared pursuant to Section 8518 indicates that all recommendations to remove that infestation or infection and to repair damage caused by that infestation or infection have been completed: "This is to certify that the property described herein is now free of evidence of active infestation or infection in the visible and accessible areas . . .

13. Code section 8622 states, in pertinent part:

When a complaint is accepted for investigation of a registered company, the board, through an authorized representative, may inspect any or all properties on which a report has been issued pursuant to Section 8516 or a notice of completion has been issued pursuant to Section 8518 by the registered company to determine compliance with the provisions of this chapter and the rules and regulations issued thereunder. If the board determines the property or properties are not in compliance, a notice shall be sent to the registered company so stating. The registered company shall have 30 days from the receipt of the notice to bring such property into compliance, and it shall submit a new original report or completion notice or both and an inspection fee of not more than one hundred twenty five dollars ($125) for each property inspected. If a subsequent reinspection is necessary, pursuant to the board's review of the new original report or notice or both, a commensurate reinspection fee shall also be charged. If the board's authorized representative makes no determination or determines the property is in compliance, no inspection fee shall be charged . . .

14. Code section 8641 states:

Failure to comply with the provisions of this chapter, or any rule or regulation adopted by the board, or the furnishing of a report of inspection without the making of a bona fide inspection of the premises for wood destroying pests or

organisms, or furnishing a notice of work completed prior to the completion of the work specified in the contract, is a ground for disciplinary action.

15. Code section 8642 states that "[t]he commission of any grossly negligent or fraudulent act by the licensee as a pest control operator, field representative, or applicator or by a registered company is a ground for disciplinary action."

16. Code section 8644 states:

> Fraud or misrepresentation, after inspection, by any licensee or registered company engaged in pest control work of any infestation or infection of wood destroying pests or organisms found in property or structures, or respecting any conditions of the structure that would ordinarily subject structures to attack by wood-destroying pests or organisms, whether or not a report was made pursuant to Sections 8516 and 8517 of this code, is a ground for disciplinary action.

(Regulatory Provisions)

17. California Code of Regulations, title 16, section ("Regulation") 1990 states, in pertinent part:

> (a) All reports shall be completed as prescribed by the board. Copies filed with the board shall be clear and legible. All reports must supply the information required by Section 8516 of the Code and the information regarding the pesticide or pesticides used as set forth in Section 8538 of the Code, and shall contain or describe the following:
>
> . . . .
>
> (3) Infestations.
>
> (4) Wood members found to be damaged by wood destroying pests or organisms.
>
> (b) Conditions usually deemed likely to lead to infestation or infection include, but are not limited to:
>
> . . . .
>
> (2) Inaccessible subareas or portions thereof and areas where there is less than 12 inches clear space between the bottom of the floor joists and the unimproved ground area.
>
> (3) Excessive Cellulose Debris. This is defined as any cellulose debris of a size that can be raked or larger. Stumps and wood imbedded in footings in earth contact shall be reported.
>
> (4) Earth-to-wood contacts.
>
> (5) Commonly controllable moisture conditions which would foster the growth of a fungus infection materially damaging to woodwork.

. . . .

(e) Information regarding all accessible areas of the structure including but not limited to the substructure, foundation walls and footings, porches, patios and steps, stairways, air vents, abutments, stucco walls, columns, attached structures or other parts of a structure normally subject to attack by wood-destroying pests or organisms . . .

18. Regulations, Title 16, section 1996.3, states:

(a) The address of each property inspected and/or upon which work was completed shall be reported on a form prescribed by the Board and designated as the WDO Inspection and Completion Activity Report Form (see Form No. 43M-52 Rev. 5/03) at the end of this section. This form shall be prepared by each registered company and shall comply with all of the requirements pursuant to Section 8516(b), and 8518.

(b) The form shall contain the following information for each property inspected and/or upon which work was completed.

(1) Company Name

(2) Company registration number

(3) Branch office registration number (when a branch office issues an inspection report or notice of work completed

(4) Date of Activity

(5) Address of property inspected or upon which work was completed, including zip code

(6) Activity Code

(7) License number of licensee performing the inspection

(c) Failure of a registered company to report and file with the Board the address of any property inspected or upon which work was completed pursuant to Section 8516(b) or 8518 are grounds for disciplinary action and subject to a fine of not more then two thousand five hundred dollars ($2,500).

COST RECOVERY

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

20. Government Code section 11519(d) provides, in pertinent part, that the Board may require restitution of damages suffered as a condition of probation in the event probation is ordered.

BOARD'S INVESTIGATION OF RESPONDENT INTEGRATED

21. On or about June 2011, the Board began an investigation into the practices of Respondent Integrated based upon information given to the Board that Respondent Integrated was subcontracting with pest control companies throughout the State of California but failing to identify the subcontractors in the completed Wood Destroying Pests and Organisms Inspection Reports (hereinafter "inspection reports") and Standard Notice of Work Completed and Not Completed (hereinafter "notice(s) of completion"). In order to implement this business practice, Respondent Integrated subcontracted with various pest control companies who would then complete their work and send the completed inspection reports to Respondent Integrated's office in Studio City, Ca. Respondent Integrated would then remove the subcontracted pest control company's name from the completed inspection report, and then cut and paste their name onto the inspection report and/or notice of completion as if to represent that Respondent Integrated had completed the work contained within the report(s) when in fact it had not completed the work. Respondent Integrated would then send these documents to their client Altisource[1], for escrow purposes without informing Altisource that the aforementioned pest control work had been subcontracted and/or had been completed by a company other than Respondent Integrated.

22. If work or repairs were needed on the properties that were inspected, Respondent Integrated would then contact the subcontracted pest control company which completed the original inspection, have that company complete the work, and then cut and paste Respondent Integrated's name on the notice of completion and send this along with a higher billing amount to their client Altisource. Respondent Integrated would then get the higher amount, pay the pest

[1] Altisource is a company that specializes in selling bank owned properties. Lenders in most real estate transactions in California require wood destroying pests and organisms inspection reports, prior to the commenced sale of property.

control company the lower amount, and keep the difference without ever inspecting or performing any pest control work at any of these properties.

23. On or about July 20, 2011, Board investigator Steve Winfrey ("Investigator Winfrey") met with Respondent Greenberg who confirmed to investigator Winfrey that Respondent Integrated did not physically inspect any of the properties contained within the completed Wood Destroying Pests and Organisms Inspection Reports and Standard Notice of Work Completed and Not Completed but instead would rely on information (i.e., documents and photos) from the pest control companies that he subcontracted with to then complete the information which he then sent to Altisource.

24. On or about July 22, 2011, investigator Winfrey met with Respondent Crudup and Respondent Crudup told investigator Winfrey that he had full knowledge that Respondents Integrated and Greenberg were cutting and pasting their names and altering inspection reports and notices of completion completed by other companies without ever having physically been to the properties. Respondent Crudup told investigator Winfrey that "he wouldn't do an inspection report that way" but said that this was the way Respondent Greenberg did inspections.

25. Between July and August 2011, investigator Winfrey obtained copies of various inspection reports where Respondents Greenberg and Integrated Asset had cut and pasted the Integrated Asset Management name over the names of the pest control operators who actually performed the inspection and/or completed the work. Investigator Winfrey confirmed that this occurred on the following properties:

A. 30499 S. Koster Road, Tracy, Ca. 95304-Inspection report done by Take Care Termite, Inc., dated 9/29/10, Respondent Integrated created an inspection report dated 9/29/10.

B. 9672 Pacific Avenue, Anaheim, Ca. 92804-Inspection report done by Empire Exterminators, Inc., dated 11/9/10, Respondent Integrated created an inspection report dated 11/9/10.

C. 905 33rd Street, Bakersfield, Ca. 93301-Inspection report done by Burdette and Sons Termite Control, dated 12/14/10, Respondent Integrated created an

inpsection report dated 12/14/10, Notice of Completion done by Burdette and Sons Termite Control, dated 1/5/11, Respondent Integrated created a Notice of Completion dated 1/5/11.

D. 131 Orit Avenue, Parlier, Ca. 93648- Inspection report done by Burdette and Sons Termite Control, dated 12/29/10, Respondent Integrated created an inspection report dated 12/29/10. Notice of Completion done by Burdette and Sons Termite Control, dated 1/10/11, Respondent Integrated created a Notice of Completion, dated 1/10/11.

E. 1249 East Yale Avenue, Fresno, Ca. 93704, Inspection report done by Burdette and Sons Termite Control, dated 12/29/10, Respondent Integrated created an inspection report dated 12/29/10. Notice of Completion done by Burdette and Sons Termite Control, dated 1/24/11, Respondent Integrated created a Notice of Completion, dated 1/24/11.

F. 1017 7th Street, Ripon, Ca. 95366, Inspection report done by Western Exterminator Company, dated 4/18/11, Respondent Integrated created an inspection report dated 4/18/11.

26. On or about June 6, 2011, Respondent Integrated issued an inspection report for a property located at 21925 Fallview Drive, Sonora, Ca. 95370. Respondent Greenberg was listed on the report as having completed the inspection of this property. Respondent Integrated's physical description of the property contained in its inspection report did not match the property located at 21925 Fallview Drive, Sonora, Ca. 95370. For instance, Respondent Integrated's report described the property as a "one story wood sided frame single family residence, vacant, slab foundation composite roof," when in fact, the property was clearly a multi-story structure with some portion of the structure as a raised foundation with a wood shake roof. Further, the diagram listed in Respondent Integrated's report did not match the foundation and deck shape, or the locations and appearance of the structure. The diagram showed an attached deck as if it were at the rear of the structure when, in fact, the main attached deck is located at the front or left of the structure.

27. On or about July 20, 2011, investigator Winfrey met with Respondent Greenberg and asked Greenberg if he could inspect the company's Wood Destroying Organism (WDO) activities since June 10, 2011. Based upon his inspection, Winfrey concluded that 197 WDO activities were completed that were not submitted to the Board no later than 10 business days after the commencement of the inspection or upon completion of the work.

FIRST CAUSE FOR DISCIPLINE

(Failure to Issue Bona Fide Wood Destroying Pest and Organisms Inspection Reports and Standard Notice of Work Completed Documents)

28. Respondents Integrated, Greenberg, and Crudup are subject to disciplinary action pursuant to Code section 8641 in that they failed to comply with Code sections 8514 and 8516, subdivision (b) and 1990 of the California Code of Regulations in that Respondents issued Wood Destroying Pests and Organisms Inspection Reports and Notices of Completion expressing opinions or statements relating to the absence or presence of wood destroying pests or organisms prior to, and/or without conducting a physical inspection on properties listed in paragraphs 21-27 set forth above which paragraphs are incorporated by reference as though fully set forth herein.

29. Moreover, Respondents Integrated, Greenberg, and Crudup are subject to disciplinary action pursuant to Code section 8641 in that they failed to comply with Code section 8514 in that Respondents subcontracted structural fumigation work without the written consent of their client, i.e. the consumer, Altisource. Likewise, Respondents failed to inform Altisource in advance, in writing, of any proposed work which the registered company intended to subcontract and of Altisource's right to select another person or entity of the consumer's choosing to perform the work. Paragraphs 21-27 set forth above are hereby incorporated by reference as though fully set forth herein.

SECOND CAUSE FOR DISCIPLINE

(Gross Negligence and/or Fraud)

30. Respondents Integrated, Greenberg, and Crudup are subject to disciplinary action pursuant to Code section 8641 in that as to the following properties, Respondents failed to

comply with Code section 8642, and California Code of Regulations section 1990 in that they committed grossly negligent and/or fraudulent acts as follows:

a. Respondents issued a report for the property located at 21925 Fallview Drive, Sonora, Ca. 95370 which contained gross errors and/or false or misleading statements in that Respondents' report contains a detailed description of a completely different property other than the property referenced to in the report. Complainant incorporates paragraphs 20-25 by reference as though fully set forth herein.

b. By cutting and pasting their name and contact information over reports issued by other pest control operators, Respondents represented to their client Altisource that they had inspected and completed the inspections referenced in the following properties when in fact, Respondents had subcontracted the work without telling Altisource and/or failing to obtain their client's written informed consent prior to subcontracting and prior to issuance of reports on the properties referred to in paragraphs 21-27 set forth above which paragraphs are incorporated by reference as though fully set forth herein.

THIRD CAUSE FOR DISCIPLINE

(Failure to File WDO Activity Statement Within 10 Days After Commencement of Inspection or Upon Work Completed)

31. Respondents Integrated Asset Management and Greenberg are subject to disciplinary action pursuant to Code section 8641 in that they failed to comply with Code sections 8516 subdivision (b) and 8518 and California Code of Regulations, title 16, section 1996.3, in that Respondents failed to file with the Board on approximately 197 occasions the address of each property inspected by Respondents or upon which work was completed on a Wood Destroying Organisms Inspection and Completion Activity Form (WDO Activity Statement) prescribed by the Board no later than 10 business days after the commencement of an inspection by Respondents or upon completed work as further set forth in paragraphs 21-27 above which are incorporated herein.

OTHER MATTERS

32. Code section 8620 provides, in pertinent part, that a respondent may request that a civil penalty of not more than $5,000 be assessed in lieu of an actual suspension of 1 to 19 days, or not more than $10,000 for an actual suspension of 20 to 45 days. Such request must be made at the time of the hearing and must be noted in the proposed decision. The proposed decision shall not provide that a civil penalty shall be imposed in lieu of a suspension.

33. Pursuant to Code section 8624, the causes for discipline established as to Respondent Integrated Asset Management likewise constitute causes for discipline against Respondent Greenberg and/or Respondent Crudop regardless of whether they had knowledge of or participated in the acts or omissions which constitute causes for discipline against Respondent Integrated Asset Management.

34. Pursuant to Code section 8624, if Operator's License Number OPR 11050, issued to Respondent Moore Greenberg, or Operator's License Number OPR 8172 issued to Respondent Kris Stanley Crudup, is suspended or revoked, the Board may suspend or revoke Company Registration Certificate Number PR 5786, issued to Respondent Integrated Asset Management.

35. Respondent Moore Greenberg, the owner and qualifying manager for Respondent Integrated Asset Management, had knowledge of and participated in, the acts or omissions which constitute causes for discipline against Respondent Integrated Asset Management.

36. Respondent Kris Stanley Crudup, the former qualifying manager for Respondent Integrated Asset Management, had knowledge of and participated in, the acts or omissions which constitute causes for discipline against Respondent Integrated Asset Management.

37. Pursuant to Code section 8654, if discipline is imposed on Company Registration Certificate Number PR 5786, issued to Respondent Integrated Asset Management, Respondents Moore Greenberg and/or Kris Stanley Crudup shall be prohibited from serving as an officer, director, associate, partner, qualifying manager, or responsible managing employee for any registered company during the time the discipline is imposed, and any registered company which employs, elects, or associates Moore Greenberg or Kris Stanley Crudup shall be subject to disciplinary action.

38. Code section 8622 provides, in pertinent part, that Respondents shall submit an inspection fee of not more than $125. If a reinspection is necessary, a commensurate reinspection fee shall be charged.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Structural Pest Control Board issue a decision:

1. Revoking or suspending Company Registration Certificate Number PR 5786, issued to IAM-US, Inc. dba International Asset Management;

2. Revoking or suspending Operator's License Number OPR 11050, issued to Respondent Moore Greenberg;

3. Prohibiting Moore Greenberg from serving as an officer, director, associate, partner, qualifying manager or responsible managing employee of any registered company during the period that discipline is imposed on Company Registration Certificate Number PR 5786, issued to IAM-US, Inc. dba International Asset Management;

4. Revoking or suspending Operator's License Number OPR 8172 issued to Respondent Kris Stanley Crudup;

5. Prohibiting Kris Stanley Crudup from serving as an officer, director, associate, partner, qualifying manager or responsible managing employee of any registered company during the period that discipline is imposed on Company Registration Certificate Number PR 5786, issued to IAM-US, Inc. dba International Asset Management;

6. Ordering Integrated Asset Management, Moore Greenberg and/or Kris Stanley Crudup to pay the Structural Pest Control Board the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

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

DATED: 3/14/12

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

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