

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

In the Matter of the Accusation Against:

**INTEGRATED ASSET MANAGEMENT;
MOORE GREENBERG**
12031 Ventura Blvd., Suite 4
Studio City, CA 91604

12501 Burbank Blvd., Ste 200
Valley Village, CA 91607

Company Registration Certificate No. PR
5786, Br. 3

and

MOORE GREENBERG
12031 Ventura Blvd., Suite 4
Studio City, CA 91604

12501 Burbank Blvd., Ste 200
Valley Village, CA 91607

Operator's License No. OPR 11050 Br. 3

Respondents.

Case No. 2012-43 .


OAH No. 2012061070 .

DECISION AND ORDER

The attached Stipulated Surrender of License and 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 February 24, 2013.

It is so ORDERED January 25, 2013.


FOR THE STRUCTURAL PEST CONTROL BOARD
DEPARTMENT OF PESTICIDE REGULATION

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

10 In the Matter of the Accusation Against:

Case No. 2012-43

11 **INTEGRATED ASSET MANAGEMENT;**
12 **MOORE GREENBERG**
1231 Ventura Blvd., Suite 4
13 Studio City, CA 91604

OAH No. 2012061070

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

14 **12501 Burbank Blvd., Ste 200**
15 **Valley Village, CA 91607**

16 **Company Registration Certificate No. PR**
17 **5786, Br. 3**

18 **and**

19 **MOORE GREENBERG**
12031 Ventura Blvd., Suite 4
20 Studio City, CA 91604

21 **12501 Burbank Blvd., Ste 200**
22 **Valley Village, CA 91607**

23 **Operator's License No. OPR 11050 Br. 3**

24 Respondents.

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27 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this
28 proceeding that the following matters are true:

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PARTIES

1. Susan Saylor (Complainant) is the Interim Registrar/Executive Officer of the Structural Pest Control Board, Department of Pesticide Regulation. She brought this action solely in her official capacity and is represented in this matter by Kamala D. Harris, Attorney General of the State of California, by Langston M. Edwards, Deputy Attorney General.

2. Integrated Asset Management; Moore Greenberg (Respondents) are representing themselves in this proceeding and have chosen not to exercise their right to be represented by counsel.

3. On or about March 9, 2009, the Structural Pest Control Board issued Company Registration Certificate No. PR 5786 in Branch 3 (termite) to IAM-US, Inc. dba International Asset Management with Moore 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).

4. On or about March 11, 2005, the Board issued Operator's License No. OPR 11050 in Branch 3 to Moor Greenberg (Respondent Greenberg). On or about March 9, 2009, Respondent Greenberg became the Branch 3 Qualifying Manager of Respondent Integrated Asset Management. Or about April 12, 2011, Respondent Greenberg disassociated as Branch 3 Qualifying Manager of Respondent Integrated. 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.

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JURISDICTION

5. Accusation No. 2012-43 was filed before the Structural Pest Control Board (Board), Department of Pesticide Regulation, and is currently pending against Respondents. The Accusation and all other statutorily required documents were properly served on Respondents on May 29, 2012. Respondents timely filed its Notice of Defense contesting the Accusation. A copy of Accusation No. 2012-43 is attached as **Exhibit A** and incorporated by reference.

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2 **ADVISEMENT AND WAIVERS**

3 6. Respondents have carefully read, and understand the charges and allegations in
4 Accusation No. 2012-43. Respondents also have carefully read, and understand the effects of this
5 Stipulated Surrender of License and Order.

6 7. Respondents are fully aware of their legal rights in this matter, including the right to a
7 hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at
8 its own expense; the right to confront and cross-examine the witnesses against them; the right to
9 present evidence and to testify on its own behalf; the right to the issuance of subpoenas to compel
10 the attendance of witnesses and the production of documents; the right to reconsideration and
11 court review of an adverse decision; and all other rights accorded by the California
12 Administrative Procedure Act and other applicable laws.

13 8. Respondents voluntarily, knowingly, and intelligently waive and give up each and
14 every right set forth above.

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16 **CULPABILITY**

17 9. Respondents admit the truth of each and every charge and allegation in Accusation
18 No. 2012-43, agree that cause exists for discipline and hereby surrenders their Company
19 Registration Certificate No. PR 5786 and Operator's License No. OPR 11050 in Branch 3 for the
20 Board's formal acceptance.

21 10. Respondents understand that by signing this stipulation Entity enables the Board to
22 issue an order accepting the surrender of their Company Registration Certificate No. PR 5786 and
23 Operator's License No. OPR 11050 in Branch 3 without further process.

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25 **CONTINGENCY**

26 11. This stipulation shall be subject to approval by the Structural Pest Control Board.
27 Respondents understand and agrees that counsel for Complainant and the staff of the Structural
28 Pest Control Board may communicate directly with the Board regarding this stipulation and

1 surrender, without notice to or participation by Respondents. By signing the stipulation,
2 Respondents understand and agree that they may not withdraw its agreement or seek to rescind
3 the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt
4 this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be
5 of no force or effect, except for this paragraph, it shall be inadmissible in any legal action
6 between the parties, and the Board shall not be disqualified from further action by having
7 considered this matter.

8 12. The parties understand and agree that facsimile copies of this Stipulated Surrender of
9 License and Order, including facsimile signatures thereto, shall have the same force and effect as
10 the originals.

11 13. This Stipulated Surrender of License and Order is intended by the parties to be an
12 integrated writing representing the complete, final, and exclusive embodiment of their agreement.
13 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
14 negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order
15 may not be altered, amended, modified, supplemented, or otherwise changed except by a writing
16 executed by an authorized representative of each of the parties.

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

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20 **ORDER**

21 IT IS HEREBY ORDERED that Company Registration Certificate No. PR 5786, issued to
22 Respondents Integrated Asset Management; Moore Greenberg, and Operator's License No. OPR
23 11050 in Branch 3, issued to Moore Greenberg is surrendered and accepted by the Structural Pest
24 Control Board.

25 1. The surrender of Respondents' Company Registration Certificate No. PR 5786 and
26 Operator's License No. 11050 in Branch 3 and the acceptance of the surrendered licenses by the
27 Board shall constitute the imposition of discipline against Respondents. This stipulation
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1 constitutes a record of the discipline and shall become a part of Respondents' license history with
2 the Structural Pest Control Board.

3 2. Respondents shall lose all rights and privileges in California as of the effective date of
4 the Board's Decision and Order.

5 3. Respondents shall cause to be delivered to the Board their pocket licenses and, if one
6 was issued, its wall certificate on or before the effective date of the Decision and Order.

7 4. If Respondents ever file an application for licensure or a petition for reinstatement in
8 the State of California, the Board shall treat it as a petition for reinstatement. Respondents must
9 comply with all the laws, regulations and procedures for reinstatement of a revoked license in
10 effect at the time the petition is filed, and all of the charges and allegations contained in
11 Accusation No. 2012-43 shall be deemed to be true, correct and admitted by Respondents when
12 the Board determines whether to grant or deny the petition.

13 5. Respondents shall pay the agency its costs of investigation and enforcement in the
14 amount of \$7,047.57 prior to issuance of a new or reinstated license.

15 6. If Respondents should ever apply or reapply for a new license or certification, or
16 petition for reinstatement of a license, by any other agency in the State of California, all of the
17 charges and allegations contained in Accusation No. 2012-43 shall be deemed to be true, correct,
18 and admitted by Respondents for the purpose of any Statement of Issues or any other proceeding
19 seeking to deny or restrict licensure.

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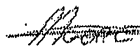
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ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my Company Registration Certificate No. PR 5786 and Operator's License No. 11050 in Branch 3. 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: 11/16/2012


INTEGRATED ASSET MANAGEMENT;
MOORE GREENBERG
Respondents

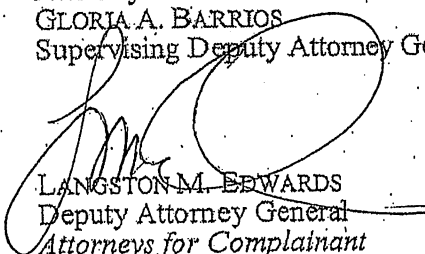
ENDORSEMENT

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

Dated: 11/16/12

Respectfully submitted,

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


LANGSTON M. EDWARDS
Deputy Attorney General
Attorneys for Complainant

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