1 2 3 4 5 6 7 8 9	EDMUND G. BROWN JR. Attorney General of California GLORIA A. BARRIOS Supervising Deputy Attorney General LANGSTON M. EDWARDS Deputy Attorney General State Bar No. 237926 300 So. Spring Street, Suite 1702 Los Angeles, CA 90013 Telephone: (213) 620-6343 Facsimile: (213) 897-2804 Attorneys for Complainant BEFORE THE STRUCTURAL PEST CONTROL BOARD DEPARTMENT OF PESTICIDE REGULATION STATE OF CALIFORNIA
10 11	In the Matter of the Statement of Issues Case No. 2011-8 Against:
12 13	CORY WILSON P.O. Box 191246 Los Angeles, CA 90019 STATEMENT OF ISSUES
14 15 16 17	Operator's License No. OPR 11142 Branch 2 Respondent.
18	Complainant alleges:
19	PARTIES
20	1. Kelli Okuma ("Complainant") brings this Statement of Issues solely in her official
21	capacity as the Registrar/Executive Officer of the Structural Pest Control Board ("Board").
22	2. On or about September 21, 2009, the Board received an application for a Field
23	Representative License, Branch 3 from Cory Wilson ("Respondent"). On or about September 10,
24	2009, Cory Wilson certified under penalty of perjury to the truthfulness of all statements,
25	answers, and representations in the application. The Board denied the application on March 10,
26	2010.
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	STATEMENT OF ISSUES

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	JURISDICTION
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2	3. This Statement of Issues is brought before the Board under the authority of the
3	following laws. All section references are to the Business and Professions Code unless otherwise
4	indicated.
5	STATUTORY PROVISIONS
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7	4. Section 8568 of the Code states:
8	"After a hearing the board may deny a license unless the applicant makes a showing
9	satisfactory to the board that the applicant, if an individual, has not:
10	(a) Committed any act constituting grounds for denial of licensure under Section
11	480."
12	5. Section 480 of the Code states:
13	"(a) A board may deny a license regulated by this code on the grounds that the applicant
14	has one of the following:
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16	(2) Done any act involving dishonesty, fraud, or deceit with the intent to
17	substantially benefit himself or herself or another, or substantially injure another.
18	(3) Done any act that if done by a licentiate of the business or profession in
19	question, would be grounds for suspension or revocation of license."
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21	FIRST CAUSE FOR DENIAL OF APPLICATION
22	(Acts Involving Dishonesty, Fraud or Deceit)
23	6. Respondent's application is subject to denial under Code section 8568, subdivision (a)
24	and 480, subdivision (a)(2) in that Respondent committed acts involving dishonesty, fraud or
25	deceit.
26	a. On or around January 24, 2004, in a prior action, the Board issued citation
20	number CF 04-155 against Respondent's Field Representative License FR 31811 ("License") for
28	violation of Business and Professions Code section 8593 and California Code of Regulations title
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	STATEMENT OF ISSUES

16 section 1950 [failure to provide proof of completion of continuing education courses]. The Respondent was ordered by the Board to complete 8 hours of continuing education courses and pay \$900.00 in penalties. The citation is now final and is incorporated by reference as if fully set forth herein.

b. The underlying circumstances are that on or around 2002, Respondent renewed his License by representing to the Board that he had obtained the continuing education hours required in order to renew. Then on or around January 17, 2003, the Board randomly selected Respondent's license for the continuing education audit program. After numerous correspondence letters from the Board requesting documentation supporting Respondent's completion of continuing education courses, the Respondent failed to produce credible or authenticate certificates.

OTHER MATTERS

7. Pursuant to Code section 8654, if Respondent's application is denied, then Respondent 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 grounds for disciplinary action.

<u>PRAYER</u>

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

Denying the application of Cory Wilson for a Field Representative Branch 3 License;
Taking such other and further action as deemed necessary and proper.

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24 DATED: 9/2/10 25

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KELLI OKUMA Registrar/Executive Officer Structural Pest Control Board State of California *Complainant*

STATEMENT OF ISSUES