

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

In the Matter of the Accusation Against:

**HYDREX TERMITE AND PEST
CONTROL OF SAN GABRIEL VALLEY**
11104 Rush St., Unit #5
South El Monte, CA 91733
**Company Registration Certificate No. PR
4531, Br. 2 and 3**

**STANLEY KARL SANDERS, President
ERIC JOSEPH WERNER, Qualifying
Manager
SERGIO ZAMORANO, Qualifying
Manager**

-and-

ERIC JOSEPH WERNER
11072-A Mt. Brow Road
Sonora, CA 95370
Operator License No. OPR 11667, Br. 2

-and-

SERGIO ZAMORANO
14408 East Whittier Boulevard #B3
Whittier, CA 90605
Operator License No. OPR 10565, BR. 3

Respondents.

Case No. 2014-37

OAH No. 2014030514

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 as to Respondent Hydrex Termite and Pest Control of San Gabriel Valley in this matter.

This Decision shall become effective on November 29, 2014.

It is so ORDERED October 30, 2014.



FOR THE STRUCTURAL PEST CONTROL BOARD
DEPARTMENT OF CONSUMER AFFAIRS

1 KAMALA D. HARRIS
Attorney General of California
2 MARC D. GREENBAUM
Supervising Deputy Attorney General
3 ZACHARY T. FANSELOW
Deputy Attorney General
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Attorneys for Complainant

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9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

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22 **SERGIO ZAMORANO**
14408 East Whittier Boulevard #B3
23 Whittier, CA 90605
24 **Operator License No. OPR 10565, BR. 3**
25 Respondents.

Case No. 2014-37
OAH No. 2014030514
STIPULATED SURRENDER OF
LICENSE AND ORDER AS TO
RESPONDENT HYDREX TERMITE
AND PEST CONTROL OF SAN
GABRIEL VALLEY ONLY

1 IT IS HEREBY STIPULATED AND AGREED by and between the parties¹ to the above-
2 entitled proceedings that the following matters are true:

3 **PARTIES**

4 1. Susan Saylor ("Complainant") is the Registrar/Executive Officer of the Structural
5 Pest Control Board. She brought this action solely in her official capacity and is represented in
6 this matter by Kamala D. Harris, Attorney General of the State of California, by Zachary T.
7 Fanselow, Deputy Attorney General.

8 2. Hydrex Termite and Pest Control of San Gabriel Valley with Stanley Karl Sanders as
9 President is representing itself in this proceeding and has chosen not to exercise its right to be
10 represented by counsel.

11 3. On or about May 7, 2004, the Structural Pest Control Board issued Company
12 Registration Certificate Number PR 4531 ("Registration") to Hydrex Termite and Pest Control of
13 San Gabriel Valley ("Respondent").

14 **JURISDICTION**

15 4. Accusation No. 2014-37 was filed before the Structural Pest Control Board
16 ("Board"), Department of Consumer Affairs, and is currently pending against Respondent. The
17 Accusation and all other statutorily required documents were properly served on Respondent on
18 December 3, 2013. Respondent timely filed its Notice of Defense contesting the Accusation. A
19 copy of Accusation No. 2014-37 is attached as Exhibit A and incorporated by reference.

20 **ADVISEMENT AND WAIVERS**

21 5. Respondent has carefully read, and understands the charges and allegations in
22 Accusation No. 2014-37. Respondent also has carefully read, and understands the effects of this
23 Stipulated Surrender of License and Order.

24 6. Respondent is fully aware of its legal rights in this matter, including the right to a
25 hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at
26 its own expense; the right to confront and cross-examine the witnesses against it; the right to

27 _____
28 ¹ The parties in this Stipulated Settlement are the Structural Pest Control Board and
Respondent Hydrex Termite and Pest Control of San Gabriel Valley only. The other named
Respondents are not a party of this settlement.

1 present evidence and to testify on its own behalf; the right to the issuance of subpoenas to compel
2 the attendance of witnesses and the production of documents; the right to reconsideration and
3 court review of an adverse decision; and all other rights accorded by the California
4 Administrative Procedure Act and other applicable laws.

5 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
6 every right set forth above.

7 CULPABILITY

8 8. Respondent admits the truth of each and every charge and allegation in Accusation
9 No. 2014-37, agrees that cause exists for discipline and hereby surrenders its Company
10 Registration Certificate No. PR 4531 for the Board's formal acceptance.

11 9. Respondent understands that by signing this stipulation it enables the Board to issue
12 an order accepting the surrender of its Company Registration Certificate without further process.

13 CONTINGENCY

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

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

27 12. This Stipulated Surrender of License and Order is intended by the parties to be an
28 integrated writing representing the complete, final, and exclusive embodiment of their agreement.

1 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
2 negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order
3 may not be altered, amended, modified, supplemented, or otherwise changed except by a writing
4 executed by an authorized representative of each of the parties.

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

7 **ORDER**

8 IT IS HEREBY ORDERED that Company Registration Certificate No. PR 4531, issued to
9 Respondent Hydrex Termite and Pest Control of San Gabriel Valley; with Stanley Karl Sanders
10 as President, is surrendered and accepted by the Structural Pest Control Board.

11 1. The surrender of Respondent's Company Registration Certificate and the acceptance
12 of the surrendered license by the Board shall constitute the imposition of discipline against
13 Respondent. This stipulation constitutes a record of the discipline and shall become a part of
14 Respondent's license history with the Structural Pest Control Board.

15 2. Respondent shall lose all rights and privileges as a registered pest control company in
16 California as of the effective date of the Board's Decision and Order.

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

19 4. If Respondent ever files an application for licensure or registration, or if Respondent
20 ever files a petition for reinstatement in the State of California, the Board shall treat it as a
21 petition for reinstatement. Respondent must comply with all the laws, regulations and procedures
22 for reinstatement of a revoked license or registration in effect at the time the petition is filed, and
23 all of the charges and allegations contained in Accusation No. 2014-37 shall be deemed to be
24 true, correct and admitted by Respondent when the Board determines whether to grant or deny the
25 petition.

26 5. Respondent shall pay the agency its costs of investigation and enforcement in the
27 amount of \$1,803.95 prior to issuance of a new or reinstated license or registration.

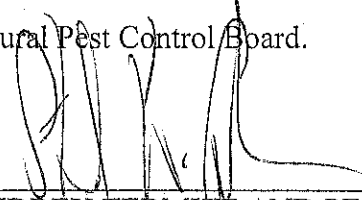
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ACCEPTANCE

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. 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.

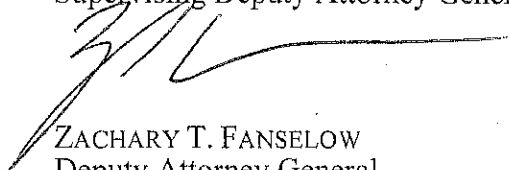
DATED: 8-14-14


HYDREX TERMITES AND PEST CONTROL OF
SAN GABRIEL VALLEY;
STANLEY KARL SANDERS
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: 8/19/14

Respectfully submitted,
KAMALA D. HARRIS
Attorney General of California
MARC D. GREENBAUM
Supervising Deputy Attorney General

ZACHARY T. FANSELOW
Deputy Attorney General
Attorneys for Complainant

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