

FILED

Date 11/17/11

By William H. Douglas

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

In the Matter of the Statement of Issues
Against:

CESAR RAYMUNDO LARA
330 E. 220th Street
Carson, California 90745

Respondent.

Case No. 2012-25

STATEMENT OF ISSUES

William H. Douglas ("Complainant") alleges:

PARTIES

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

APPLICATION INFORMATION

2. On or about November 18, 2010, the Board received an Application for Operator's License to upgrade Operator's License No. OPR 11879 to include Branch 3 from Cesar Raymundo Lara ("Respondent"). On or about November 16, 2010, Respondent certified under penalty of perjury to the truthfulness of all statements, answers, and representations in the application. The Board denied the application on January 31, 2011.

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1 is under suspension, or who has failed to renew his or her license while it was under
2 suspension, or who has been a member, officer, director, associate, qualifying
3 manager, or responsible managing employee of any partnership, corporation, firm, or
4 association whose application for a company registration has been denied for any of
5 the reasons specified in Section 8568, or whose company registration has been
6 revoked as a result of disciplinary action, or whose company registration is under
7 suspension, and while acting as such member, officer, director, associate, qualifying
8 manager, or responsible managing employee had knowledge of or participated in any
9 of the prohibited acts for which the license or registration was denied, suspended or
10 revoked, shall be prohibited from serving as an officer, director, associate, partner,
11 qualifying manager, or responsible managing employee of a registered company, and
12 the employment, election or association of such person by a registered company is a
13 ground for disciplinary action.

8 BACKGROUND INFORMATION

9 8. On or about July 2, 2009, the Board issued Operator's License Number OPR
10 11879 in Branch 2 to Respondent. On or about July 8, 2009, Respondent became the Qualifying
11 Manager of Bug Stop Services, Inc. On or about August 8, 2011, the Board filed Accusation No.
12 2012-6, alleging that Respondent, while the Qualifying Manager for Bug Stop Services, Inc.
13 violated Code section 8651, as more particularly set forth below in paragraph 9.

14 FIRST CAUSE FOR DENIAL OF APPLICATION

15 (Committed Acts Which If Done By A Licentiate Would be Grounds For Discipline)

16 9. Respondent's application is subject to denial under Code sections 8568 and
17 480(a)(3), in that between May 2010 and August 2010, while acting as the Qualifying Manager
18 for Bug Stop Services, Inc., Respondent committed acts which if done by a licentiate, would be
19 grounds for suspension or revocation under Code sections 8651 (deviation from operations
20 authorized by license or registration), as more particularly set forth in Accusation No. 2012-6,
21 attached hereto as Exhibit A.

22 SECOND CAUSE FOR DENIAL OF APPLICATION

23 (Dishonesty, Fraud or Deceit)

24 10. Respondent's application is subject to denial under Code sections 8568 and
25 480(a)(2), in that while acting as the Qualifying Manager for Bug Stop Services, Inc., Respondent
26 committed acts involving dishonesty, fraud or deceit with the intent to substantially benefit
27 himself, or substantially injure another, as more particularly set forth in Accusation No. 2012-6,
28 attached hereto as Exhibit A.

OTHER MATTERS

11. 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.

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. Denying the application of Cesar Raymundo Lara;
2. Prohibiting Cesar Raymundo Lara from serving as an officer, director, associate, partner, qualifying manager, or responsible managing employee of any licensee;
3. Revoking or suspending any other license for which Cesar Raymundo Lara is furnishing the qualifying experience or appearance; and,
4. Taking such other and further action as deemed necessary and proper.

DATED: 11/17/11

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

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