BEFORE THE
BOARD FOR PROFESSIONAL ENGINEERS, LAND SURVEYORS, AND GEOLOGISTS
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation against: HANK HSING-LIAN JONG 881 Monte Verde Drive Arcadia, CA 91007 Civil Engineer License No. C 45846 Geotechnical Engineer License No. GE 2305, Respondent.	)))))))))))	Case No. 881-A

DECISION

The attached Stipulated Settlement and Order is hereby adopted by the Board for Professional Engineers, Land Surveyors, and Geologists as its Decision in the above-entitled matter.

This Decision shall become effective on July 12, 2013.

IT IS SO ORDERED June 13, 2013.

Original Signed

BOARD FOR PROFESSIONAL ENGINEERS,
LAND SURVEYORS, AND GEOLOGISTS
Department of Consumer Affairs
State of California

KAMALA D. HARRIS
Attorney General of California
KAREN B. CHAPPELLE
Supervising Deputy Attorney General
MICHAEL BROWN
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Attorneys for Complainant

BEFORE THE
BOARD FOR PROFESSIONAL ENGINEERS, LAND SURVEYORS, AND GEOLOGISTS
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against: **HANK HSING-LIAN JONG** **881 Monte Verde Drive** **Arcadia, CA 91007** **Civil Engineer License No. C 45846** **Geotechnical Engineer License No. GE 2305** Respondent.	Case No. 881-A OAH No. 2011080278 **STIPULATED SETTLEMENT AND ORDER**

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

PARTIES

1. Richard B. Moore, PLS (Complainant) is the Executive Officer of the Board for Professional Engineers, Land Surveyors, and Geologists. He brought this action solely in his official capacity and is represented in this matter by Kamala D. Harris, Attorney General of the State of California, by Michael Brown, Deputy Attorney General.

2. Respondent Hank Hsing-Lian Jong (Respondent) is represented in this proceeding by attorney Randall F. Koenig, whose address is: 16300 Bake Parkway, Irvine, CA 92618.

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3. On or about August 27, 1990, the Board for Professional Engineers, Land Surveyors, and Geologists issued Civil Engineer License No. C 45846 to Hank Hsing-Lian Jong (Respondent). The Civil Engineer License was in full force and effect at all times relevant to the charges brought in Accusation No. 881-A and will expire on December 31, 2014, unless renewed.

4. On or about July 14, 1995, the Board for Professional Engineers, Land Surveyors, and Geologists issued Geotechnical Engineer License No. GE 2305 to Respondent. The Geotechnical Engineer License was in full force and effect at all times relevant to the charges brought in Accusation No. 881-A and will expire on December 31, 2014, unless renewed.

JURISDICTION

5. Accusation No. 881-A was filed before the Board for Professional Engineers, Land Surveyors, and Geologists (Board), Department of Consumer Affairs, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on May 26, 2011. Respondent timely filed his Notice of Defense contesting the Accusation.

6. A copy of Accusation No. 881-A is attached as exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

7. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 881-A. Respondent has also carefully read, fully discussed with counsel, and understands the effects of this Stipulated Settlement and Order.

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

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

CULPABILITY

10. Respondent understands and agrees that the charges and allegations in Accusation No. 881-A, if proven at a hearing, constitute cause for imposing discipline upon his Civil Engineer License as well as for his Geotechnical Engineer License.

11. Respondent denies each and every allegation contained in Accusation No. 881-A.

12. For the purpose of resolving the Accusation without the expense and uncertainty of further proceedings, Respondent hereby gives up his right to contest those charges.

13. Respondent, without admitting culpability, agrees to be bound by the Board's probationary terms as set forth in the Order below.

RESERVATION

14. This Stipulated Settlement and any agreements made herein are only for the purpose of these proceedings or any other proceedings in which the Board for Professional Engineers, Land Surveyors and Geologists is involved, and shall not be admissible in any other criminal or civil proceedings.

CIRCUMSTANCES IN MITIGATION

15. Respondent has never been the subject of any disciplinary action.

CONTINGENCY

16. This stipulation shall be subject to approval by the Board for Professional Engineers, Land Surveyors, and Geologists. Respondent understands and agrees that counsel for Complainant and the staff of the Board for Professional Engineers, Land Surveyors, and Geologists may communicate directly with the Board regarding this stipulation and settlement, without notice to or participation by Respondent or his counsel. By signing the stipulation, Respondent understands and agrees that he may not withdraw his agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Settlement and Order shall be of no force or

effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

17. The parties understand and agree that facsimile copies of this Stipulated Settlement and Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

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

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

ORDER

IT IS HEREBY ORDERED that Civil Engineer License No. C 45846 and Geotechnical Engineer License No. GE 2305 issued to Respondent Hank Hsing-Lian Jong (Respondent) are revoked. However, the revocations are stayed and Respondent's Civil Engineer License No. C 45846 and Geotechnical Engineer License No. GE 2305 are placed on probation for a period of two (2) years from the effective date of the settlement on the following terms and conditions:

1. **Obey All Laws.** The Respondent shall obey all federal, state, and local laws and regulations related to the practices of professional engineering and land surveying.

2. **Submit Reports.** During the period of probation, Respondent shall submit such special reports as the Board may require.

3. **Tolling of Probation.** The period of probation shall be tolled during the time the Respondent is practicing exclusively outside the state of California. If, during the period of probation, the Respondent practices exclusively outside the state of California, the Respondent shall immediately notify the Board in writing.

4. **Violation of Probation.** If the Respondent violates the probationary conditions in

any respect, the Board, after giving the Respondent notice and the opportunity to be heard, may vacate the stay and reinstate the present Accusation. If, during the period of probation, an accusation or petition to vacate stay is filed against the Respondent, or if the matter has been submitted to the Office of the Attorney General for the filing of such, the Board shall have continuing jurisdiction until all matters are final, and the period of probation shall be extended until all matters are final.

5. **Completion of Probation.** Upon successful completion of all of the probationary conditions and the expiration of the period of probation, the Respondent's Civil Engineer License No. C 45846, and Geotechnical Engineer License, No. GE 2305 shall be unconditionally restored.

6. **Cost Recovery.** Not less than six (6) months prior to the end of the probationary period, Respondent shall reimburse the Board for its investigative and enforcement costs in this matter in the amount of $2,006.25. Payments may be made in installments.

7. **Examination.** Within sixty (60) days from the effective date of the decision, Respondent shall take and pass the California Laws and Board Rules examination as administered by the Board.

8. **Take And Pass Examinations.** Within eighteen (18) months from the effective date of the settlement, the Respondent shall successfully complete the following course at California State University – Fullerton:

EGCLE 494L Design of Civil Engineering Structures Laboratory.

Corequisite: EGCE 494. Design of bridges according to AASHTO code. Design of project to the standards of professional practice.

9. **Contract.** Within thirty (30) days from the effective date of settlement, at the expense of Respondent Hank Jong, Counsel for Respondent will review and approve Hank Jong's standard form contract and proposal for compliance with all applicable Business and Professions Code sections, including the code sections alleged to have been violated in the present Accusation. Counsel for Respondent will forward the approved standard form contract and proposal at the request of the Board or its designee.

ACCEPTANCE

I have carefully read the above Stipulated Settlement and Order and have fully discussed it with my attorney, Randall F. Koenig. I understand the stipulation and the effect it will have on my Civil Engineer License, and Geotechnical Engineer License. I enter into this Stipulated Settlement and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board for Professional Engineers, Land Surveyors, and Geologists.

DATED: 4/24/13 Original Signed

HANK HSING-LIAN JONG
Respondent

I have read and fully discussed with Respondent Hank Hsing-Lian Jong the terms and conditions and other matters contained in the above Stipulated Settlement and Order. I approve its form and content.

DATED: 4/24/13 Original Signed

Randall F. Koenig
Attorney for Respondent

ENDORSEMENT

The foregoing Stipulated Settlement and Order is hereby respectfully submitted for consideration by the Board for Professional Engineers, Land Surveyors, and Geologists of the Department of Consumer Affairs.

Dated: _____, 2013

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
KAREN B. CHAPPELLE
Supervising Deputy Attorney General

MICHAEL BROWN
Deputy Attorney General
Attorneys for Complainant

ACCEPTANCE

I have carefully read the above Stipulated Settlement and Order and have fully discussed it with my attorney, Randall F. Koenig. I understand the stipulation and the effect it will have on my Civil Engineer License, and Geotechnical Engineer License. I enter into this Stipulated Settlement and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board for Professional Engineers, Land Surveyors, and Geologists.

DATED: _____

HANK HSING-LIAN JONG
Respondent

I have read and fully discussed with Respondent Hank Hsing-Lian Jong the terms and conditions and other matters contained in the above Stipulated Settlement and Order. I approve its form and content.

DATED: _____

Randall F. Koenig
Attorney for Respondent

ENDORSEMENT

The foregoing Stipulated Settlement and Order is hereby respectfully submitted for consideration by the Board for Professional Engineers, Land Surveyors, and Geologists of the Department of Consumer Affairs.

Dated: April 24, 2013

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
KAREN B. CHAPPELLE
Supervising Deputy Attorney General

Original Signed

MICHAEL BROWN
Deputy Attorney General
Attorneys for Complainant

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Attorneys for Complainant

BEFORE THE
BOARD FOR PROFESSIONAL ENGINEERS, LAND SURVEYORS, AND GEOLOGISTS
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against**:** **HANK HSING-LIAN JONG** **881 Monte Verde Drive** **Arcadia, CA 91007** **Civil Engineer License No. C 45846** **Geotechnical Engineer License No. GE 2305** Respondent.	Case No. 881-A **A C C U S A T I O N**

Complainant alleges:

PARTIES

1. Joanne Arnold (Complainant) brings this Accusation solely in her official capacity as the Interim Executive Officer of the Board for Professional Engineers, Land Surveyors, and Geologists, Department of Consumer Affairs.

2. On or about August 27, 1990, the Board for Professional Engineers, Land Surveyors, and Geologists issued Civil Engineer License Number C 45846 to Hank Hsing-Lian Jong (Respondent). The Civil Engineer License was in full force and effect at all times relevant to the charges brought herein and will expire on December 31, 2012, unless renewed.

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3. On or about July 14, 1995, the Board for Professional Engineers, Land Surveyors, and Geologists issued Geotechnical Engineer License Number GE 2305 to Hank Hsing-Lian Jong (Respondent). The Geotechnical Engineer License was in full force and effect at all times relevant to the charges brought herein and will expire on December 31, 2012, unless renewed.

JURISDICTION

4. This Accusation is brought before the Board for Professional Engineers, Land Surveyors, and Geologists (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

5. Section 6735, subdivision (a), states in pertinent part "All civil (including structural and geotechnical) engineering plans, calculations, specifications, and reports (hereinafter referred to as 'documents') shall be prepared by, or under the responsible charge of, a registered civil engineer and shall include his or her name and license number. Interim documents shall include a notation as to the intended purpose of the document, such as 'preliminary,' 'not for construction,' 'for plan check only,' or 'for review only.'…"

6. Section 6749, subdivision (a), states, in pertinent part: "A professional engineer shall use a written contract when contracting to provide professional engineering services to a client pursuant to this chapter. The written contract shall be executed by the professional engineer and the client, or his or her representative, prior to the professional engineer commencing work, unless the client knowingly states in writing that work may be commenced before the contract is executed. The written contract shall include, but not be limited to, all of the following:

(1) A description of the services to be provided to the client by the professional engineer.

. . .

(3) The name, address, and license or certificate number of the professional engineer, and the name and address of the client.

(4) A description of the procedure that the professional engineer and the client will use to accommodate additional services.

(5) A description of the procedure to be used by any party to terminate the contract.

7. Section 6770 subdivision (a) of the Code states, in pertinent part "A licensee shall report to the board in writing the occurrence of any of the following events that occurred on or after January 1, 2008, within 90 days of the date the licensee has knowledge of the event:

. . .

(3) Any civil action judgment, settlement, arbitration award, or administrative action resulting in a judgment, settlement, or arbitration award against the licensee in any action alleging fraud, deceit, misrepresentation, breach or violation of contract, negligence, incompetence, or recklessness by the licensee in the practice of professional engineering if the amount or value of the judgment, settlement, or arbitration award is fifty thousand dollars ($50,000) or greater."

8. Section 6775 of the Code states, in pertinent part, that "[T]he board may reprove, suspend for a period not to exceed two years, or revoke the certificate of any professional engineer registered under this chapter:

. . .

"(b) Who has been found guilty by the board of any deceit, misrepresentation, or fraud in his or her practice.

"(c) Who has been found guilty by the board of negligence or incompetence in his or her practice.

. . .

"(h) Who violates any provision of this chapter."

9. Section 125.3 of the Code provides, in pertinent part, that the 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.

10. Section 118, subdivision (b), of the Code provides that the suspension/expiration/surrender/cancellation of a license shall not deprive the Board/Registrar/Director of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated.

CHEN PROJECT

11. On or about March 24, 1999, the Homeowner David Chen (Homeowner) entered into an agreement with Respondent to provide surveying services and to provide a Grading and Drainage plan for a proposed two (2) story residence and related improvements for property located at 318 West Lemon Avenue, Arcadia, California (Chen Project). On or about October 11, 2001, the Board received a complaint from Homeowner against Respondent. Homeowner alleged that the grading and drainage plan and grading certification prepared for the Chen Project were deficient and that the City of Arcadia would not approve the plan. Homeowner alleged that Respondent's plan indicated the property was constructed as "sheet flow" and drained toward the street, which did not accurately reflect the actual conditions.

12. The Respondent departed from the standard of care that would be exercised by a reasonably prudent professional engineer.

FIRST CAUSE FOR DISCIPLINE

(Negligence and/or Incompetence in the Practice of Professional Engineering)

13. Respondent is subject to disciplinary action under section 6775, subdivision (c) of the Code, in that on the Chen Project, Respondent committed negligence, and/or incompetence in violation of the applicable standard of care, including, but limited to:

a. The site's drainage pattern was not constructed in accordance with the original grading plan approved by the City of Arcadia. The drainage was supposed to drain to the street, however, it apparently was constructed to drain towards the proposed residence.

b. Respondent provided a "Final Grading Verification," to certify an inspection on July 26, 2001 after completion of grading.

c. The As-built grading plans (by others) reflected that the front yard was built at an elevation of up to 1/2 feet higher than planned along the front of the resident. The back yard was also built about 1/2 foot higher, resulting in ponding and poor drainage.

d. These deficiencies resulted in rejection of the grading by the City of Arcadia and resulted in additional costs and time delays for the Homeowner.

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e. Respondent signed and stamped the February 2000 revised Grading and Drainage Plan when he knew it would not comply with the City of Acadia's standards indicates negligence.

f. Respondent exhibits incompetence for making additional revisions to his Grading and Drainage Plan after going to the site and rejecting the finished grading that was done while he was not involved with the project.

g. Respondent displayed poor judgment in making the February 2000 and April 17, 2001 revisions when Respondent essentially had no engineering involvement in the project.

h. Respondent is negligent for signing and stamping a City of Arcadia's form without doing this own lot grading and drainage survey prior to his certifying the finish grades on July 26, 2001.

i. Respondent signed and stamped August 13, 2001 Grading and Drainage Plan shows a number of discrepancies with the elevations along the sides of the residence and in the rear yard. In adding recently-acquired elevations, Respondent neither checked that the new elevations were correctly transferred, nor analyzed the effect of the new elevations on the overall site drainage.

BENJY PROJECT

14. On or about 2003, Environmental Geotechnology Laboratory, Inc. (EGL) was retained to provide geotechnical engineering services for construction of a private dwelling, located at 1014 Laurel Way, Beverly Hills, California (Benjy Project). On or about August 29, 2008, the Board received a Reportable Events Form from XL Specialty Insurance Company (Insurance Co.) in regards to a civil court settlement agreement. The Insurance Co. agreed to pay $200,000.00 to Homeowner Manoucher and Shahnaz Benjy (Homeowner Benjy), property owners of the Benjy Project, in regards to construction delays and additional expenses allegedly caused by violations committed by Respondent. The Homeowner Benjy hired Respondent to perform soils engineering services on the property. Respondent reported that his tests revealed that no significant ground water would affect the construction of a residence on the property.

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However, the site experienced significant ground water issues during construction, causing delays and additional expenses.

15. The Respondent departed from the standard of care that would be exercised by a reasonably prudent professional engineer.

SECOND CAUSE FOR DISCIPLINE

(Negligence and/or Incompetence in the Practice of Professional Engineering)

16. Respondent is subject to disciplinary action under section 6775, subdivision (c) of the Code, in that on the Benjy Project, Respondent committed negligence, and/or incompetence in violation of the applicable standard of care, including, but limited to:

a. Respondent's Report of Geotechnical and Engineering Geological Investigation (Report) failed to show that the scope of his proposed site investigation, or the actual site investigation that EGL performed, was in accordance with that needed by the City of Beverly Hills.

b. Respondent's Report failed to state that uncertified fills are unacceptable for support of structures.

c. Respondent's Report reference to the phenomenon "the pressure of gravels underneath" is incoherent for terminating the test pits at 6' and 6.5' depths.

d. Respondent's Report failed to adequately investigate the critical site characteristics.

e. Respondent's Report failed to show the means by which the 40 feet fill and the underlying Alluvium was encountered.

f. Respondent's Report failed to define the basis of his expressed professional opinion that the absence of groundwater in the single 19 foot deep boring drilled during the summer season would indicate that "Groundwater is therefore not expected to be significant constrain during the construction."

g. Respondent's Report recommendation regarding surface soils removal and recompaction are based on any information other than the subsurface information obtained from a single source.

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h. Respondent's Report failed to provide information to the reason Respondent decided to ignore the information obtained from site geology section of the report where he represents that 40 feet of uncertified fill was encountered at the site.

i. Respondent's Report failed to provide information as to the criteria the Respondent used to classify the "Silty clay, light brown, moist medium firm with few slates" encountered in BH-1 at the depth of 14 feet as "bedrock".

j. Respondent's Report failed to provide information as to the methodology or date from the Respondent's previous experience in the area, and/or investigation in the Project site, that Respondent utilized to recommend only 14 feet of fill soils below existing grade be removed and recompacted while purportedly 40 feet of fill was encountered.

k. Respondent's Report failed to provide information as to the reason for different vertical scale below 100' depth.

l. Respondent's Report failed to provide relevance of extracting undisturbed samples from uncertified fill material that the Respondent recommend be removed and replaced at the site.

m. Respondent's Report failed to provide relevance of subjecting the extracted samples from material to be removed and replaced to Moisture/Density, Shear, Consolidation, Corrosion, and Expansion index tests.

n. Respondent's Report failed to provide relevance of utilizing the test results from tests carried out on material that Respondent had recommended to be removed and replaced in his engineering analysis to formulate design and construction recommendations.

o. Respondent's Report failed to provide relevance of angles of Friction of 80 to 400 degrees and cohesion of 30 to 45 pounds per square foot for fill soils, alluvial soils and Concrete used for slope stability analysis.

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THIRD CAUSE FOR DISCIPLINE

(Violating Requirements of the Business and Professions Code)

17. Respondent is subject to disciplinary action under section 6775 subdivision (h), in conjunction with Section 6735, subdivision (a), for failing to show clearly that a civil engineering report was preliminary.

18. Respondent is subject to disciplinary action under section 6775, subdivision (h), in conjunction with Section 6749, subdivision (a)(1), for failing to provide a clear scope of services in a written contract to provide professional engineering services.

19. Respondent is subject to disciplinary action under section 6775, subdivision (h), in conjunction with Section 6749, subdivision (a)(3), for failing to include a license number in a written contract.

20. Respondent is subject to disciplinary action under section 6775, subdivision (h), in conjunction with Section 6749, subdivision (a)(4), for failing to include in a written contract a description of the procedure to be used to accommodate additional services.

21. Respondent is subject to disciplinary action under section 6775, subdivision (h), in conjunction with Section 6749, subdivision (a)(5), for failing to include in a written contract a description of the procedure to be used to terminate a contract.

FOURTH CAUSE FOR DISCIPLINE

(Failed to Notify Board of the Settlement Agreement)

22. Respondent is subject to disciplinary action under section 6770, subdivision (a) subdivision (3) of the Code, in that on the Benjy Project, Respondent failed to notify the Board of the settlement agreement within ninety days of the event.

FIFTH CAUSE FOR DISCIPLINE

(Deceit, Misrepresentation, or Fraud)

23. Respondent is subject to disciplinary action under section 6775, subdivision (b) of the Code, in that on the Benjy Project, Respondent's statement that West Coast Geotechnical Consultant had accepted EGL report and all recommendations in the report is misleading and inaccurate.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board for Professional Engineers, Land Surveyors, and Geologists issue a decision:

1. Revoking or suspending Civil Engineer License Number C 45846, issued to Hank Hsing-Lian Jong

2. Revoking or suspending Geotechnical Engineer License Number GE 2305, issued to Hank Hsing-Lian Jong;

3. Ordering Hank Hsing-Lian Jong to pay the Board for Professional Engineers, Land Surveyors, and Geologists the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and

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

DATED: 5/17/11

Original Signed

JOANNE ARNOLD
Interim Executive Officer
Board for Professional Engineers, Land Surveyors, and Geologists
Department of Consumer Affairs
State of California
Complainant

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