

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

In the Matter of the Petition to Revoke Probation	)	
against:	)	
	)	
CHRIS PHILLIPS ALTURAS	)	Case No. 1151-A
9181 Burnet Avenue	)	
North Hills, CA 91343	)	
	)	
Civil Engineer License, No. C 28903,	)	
	)	
Respondent.	)	
_____	)	

ORDER DENYING PETITION FOR RECONSIDERATION

The Petition for Reconsideration filed by the respondent in the above-entitled matter has been read and considered by the Board for Professional Engineers, Land Surveyors, and Geologists. Good cause for the granting of the petition has not been shown; therefore, the Petition for Reconsideration is hereby denied.

The Decision issued by the Board for Professional Engineers, Land Surveyors, and Geologists shall become effective upon expiration of the Order Granting Stay of Execution of Decision on November 20, 2021.

IT IS SO ORDERED November 9, 2021.

*Original Signed*

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

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

In the Matter of the Petition to Revoke	)	
Probation against:	)	
	)	
CHRIS PHILLIPS ALTURAS	)	Case No. 1151-A
9181 Burnet Avenue	)	
North Hills, CA 91343	)	
	)	
Civil Engineer, License No. C 28903,	)	
	)	
Respondent.	)	
_____	)	

ORDER GRANTING STAY OF EXECUTION OF DECISION

A Decision and Order in the above matter was issued by the Board for Professional Engineers, Land Surveyors, and Geologists on September 16, 2021, to become effective on October 21, 2021. Respondent has submitted a Request for Stay and Petition for Reconsideration pursuant to Government Code section 11521, which was received by the Board for Professional Engineers, Land Surveyors, and Geologists on September 28, 2021. Pursuant to Government Code sections 11519 and 11521, a stay of execution of the Decision in this matter is granted for 30 days to allow the Board for Professional Engineers, Land Surveyors, and Geologists sufficient time to receive and consider the Petition for Reconsideration.

**Execution of the Decision is stayed until November 20, 2021.**

DATED: \_\_\_\_\_ September 29, 2021

*Original Signed*

\_\_\_\_\_  
TIFFANY CRISWELL  
Enforcement Program Manager  
Board for Professional Engineers, Land Surveyors,  
and Geologists  
Department of Consumer Affairs  
State of California

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

In the Matter of the Petition to Revoke Probation	)	
Against:	)	
	)	
CHRIS PHILIPPS ALTURAS	)	Case No. 1151-A
9181 Burnet Avenue	)	
North Hills, CA 91343	)	OAH No. 2021040872
	)	
Civil Engineer License, No. C 28903,	)	
	)	
Respondent.	)	
_____	)	

**DECISION**

Pursuant to Government Code section 11517, the Board for Professional Engineers, Land Surveyors, and Geologists of the State of California hereby adopts the attached Proposed Decision of the Administrative Law Judge as its Decision in the above-entitled matter.

This Decision shall become effective on October 21, 2021.

IT IS SO ORDERED September 16, 2021.

*Original Signed*

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

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

**In the Matter of the Petition to Revoke Probation against:**

**CHRIS PHILLIPPS ALTURAS, Respondent**

**Agency Case No. 1151-A**

**OAH No. 2021040872**

**PROPOSED DECISION**

Administrative Law Judge Deena R. Ghaly, Office of Administrative Hearings (OAH), State of California, heard this matter on July 27, 2021, by videoconference.

Deputy Attorney General Kevin Schettig represented Complainant Richard B. Moore, PLS, Executive Officer of the Board for Professional Engineers, Land Surveyors, and Geologists (Board). Respondent Chris Philipps Alturas was present throughout the hearing and represented himself.

Testimony and documentary evidence was received. The record closed and the matter was submitted for decision on July 27, 2021.

## FACTUAL FINDINGS

1. On July 12, 1978, the Board issued Civil Engineer License Number C 28903 to Respondent. The license was in effect at all times relevant to the charges brought herein and expired on March 31, 2021.
2. In a disciplinary action titled *In the Matter of the Accusation Against Chris Phillips Alturas*, Case No. 1151-A, the Board issued a decision, effective July 19, 2019 (July 2019 decision), in which Respondent's Civil Engineer License was revoked, the revocation stayed, and Respondent's license placed on probation for a period of three years.
3. The charges in the Accusation stemmed, in part, from a citation issued against Respondent in December 2015 charging that Respondent had failed to timely correct and return a record of survey pursuant to the directions of a county surveyor's office, a violation of Business and Professions Code section 8767. The citation ordered Respondent to pay a \$5,000 fine and provide the Board with evidence that he had corrected the record of survey. Respondent did not contest the citation, nor did he pay the fine or submit proof of correction.
4. A second cause of discipline arose from the Board's ongoing investigation which revealed that Respondent was functioning as the civil engineer responsible for providing professional engineering services to an organization, ECM Group. At the time, Respondent's civil engineering license had expired.
5. The July 2019 decision was based on a stipulation reached between Respondent and the Board under which he admitted to the truth of the charges against him and agreed to abide by the conditions of his probation. Condition 6 of his

probation required Respondent to pay administrative fines of \$5,000 and cost recovery fees of \$7,035 by January 2021. Payment of the fines and fees could be made to the Board in installments.

6. Respondent failed to make any payments toward the outstanding fines and fees. In February 2021, Board Enforcement Analyst Angela Smith sent Respondent a letter reminding him of his obligation to meet the conditions of his probation and, though it was past the deadline for paying the required fines and fees, noting that “[a]ny compliance with the probationary conditions prior to the taking [of] further action will be considered.” (Exh. 5, p. AGO-063.) Respondent wrote back to Ms. Smith stating that the pandemic had profoundly impacted his business and requesting a two-year extension until 2023 to pay the fine and fees.

7. At the hearing, Respondent reiterated that the pandemic had caused him financial hardship, noting that he was living with relatives and relying solely on a small Social Security payment of approximately \$1,800 per month, which fell short of covering even basic expenses for himself and his wife. Respondent further stated that he was about to start a new business and believed he could start making payments within a few months as new projects came underway and clients paid their fees. Respondent did not explain why he made no payments during the nearly one year period between the beginning of his probation term and the beginning of the pandemic. He also did not produce any corroborating evidence of his new business or pending projects.

8. Respondent’s license was previously disciplined in 2010. The charges at that time were for: (i) aiding and abetting the unlicensed practice of professional engineering and land surveying; (ii) forming a corporation containing the name of a person not licensed as a professional engineer, land surveyor, architect, or geologist;

(iii) failing to record a survey; (iv) committing negligence or incompetence in the practice of land surveying; (v) committing negligence or incompetence in the practice of civil engineering; (vi) breaching a contract to provide land surveying services; and (vii) committing fraud, deceit or misrepresentation. As with the latest disciplinary action, Respondent admitted to the charges and accepted a probationary license.

## **LEGAL CONCLUSIONS**

1. Because he failed to pay the fines and fees required under the conditions of his probation, Respondent's license is subject to revocation pursuant to the Board's July 2019 decision. (Factual Findings 2-6.)

2. Respondent's failure to pay any amount whatsoever in the more than two years after he reached agreement with the Board and more than five years since receiving the 2015 citation, which he did not contest, is not excused because of the pandemic. Respondent has been the subject of disciplinary charges or probationary terms nearly continuously for over ten years. Nonetheless, he has been repeatedly afforded the opportunity to continue in his chosen profession subject to conditions to which he agreed and was legally bound to obey. His failure to meet the monetary portions of these conditions reflects recalcitrance and refusal to acknowledge the accountability inherent in shouldering at least part of the financial burden required to monitor his licensed activities. The Board has no further obligation to extend to Respondent further time to make good on his promises.

## ORDER

Civil Engineer License No. C. 28903 issued to Respondent Chris Philipps Alturas is revoked.

DATE: 08/19/2021

*Original Signed*

Deena R. Ghaly (Aug 19, 2021 12:02 PDT)

DEENA R. GHALY

Administrative Law Judge

Office of Administrative Hearings



1 MATTHEW RODRIQUEZ  
Acting Attorney General of California  
2 CARL W. SONNE  
Senior Assistant Attorney General  
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Supervising Deputy Attorney General  
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7 *Attorneys for Complainant*

8  
9 **BEFORE THE**  
**BOARD FOR PROFESSIONAL ENGINEERS, LAND SURVEYORS,**  
10 **AND GEOLOGISTS**  
**DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12  
13 In the Matter of the Petition to Revoke  
Probation Against:

14 **CHRIS PHILIPPS ALTURAS**  
15 9181 Burnet Avenue  
West Covina, CA 91343  
16 **Civil Engineer License No. C 28903**

17 Respondent.

Case No. 1151-A

**PETITION TO REVOKE PROBATION**

18  
19  
20 **PARTIES**

21 1. Richard B. Moore, PLS (Complainant) brings this Petition to Revoke Probation solely  
22 in his official capacity as the Executive Officer of the Board for Professional Engineers, Land  
23 Surveyors, and Geologists (Board), Department of Consumer Affairs.

24 2. On or about July 12, 1978, the Board issued Civil Engineer License Number C 28903  
25 to Chris Philipps Alturas (Respondent). The Civil Engineer License was in effect at all times  
26 relevant to the charges brought herein and will expire on March 31, 2021, unless renewed.

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1 **SECOND CAUSE TO REVOKE PROBATION**

2 **(Failure to Pay Cost Recovery)**

3 8. At all times after the effective date of Respondent's probation, Condition 7 stated:

4 **Cost Recovery.** Within one and one-half (1 ½) years from the effective date of  
5 the decision, the Respondent shall reimburse the Board for its investigative and  
6 enforcement costs in this matter in the amount of \$7,035.00. Said reimbursement may  
7 be paid in installments.

8 9. Respondent's probation is subject to revocation because he failed to comply with  
9 Probation Condition 7, referenced above. The facts and circumstances regarding this violation  
10 are that Respondent failed to pay the full amount of \$7,035.00 for cost recovery, due by January  
11 17, 2021.

12 **PRAYER**

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

16 1. Revoking the probation that was granted by the Board for Professional Engineers,  
17 Land Surveyors, and Geologists in Case No. 1151-A and imposing the disciplinary order that was  
18 stayed thereby revoking Civil Engineer License No. C 28903 issued to Chris Philipps Alturas;

19 2. Revoking or suspending Civil Engineer License No. C 28903, issued to Chris  
20 Philipps Alturas; and

21 3. Taking such other and further action as deemed necessary and proper.

22  
23 DATED: 3/26/2021

24 *Original Signed*  
25 \_\_\_\_\_  
26 RICHARD B. MOORE, PLS  
27 Executive Officer  
28 Board for Professional Engineers, Land  
Surveyors, and Geologists  
Department of Consumer Affairs  
State of California  
*Complainant*

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# **Exhibit A**

**Decision and Order**

**Board for Professional Engineers, Land Surveyors, and Geologists Case No. 1151-A**

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

In the Matter of the Accusation against:	)	
	)	
CHRIS PHILIPPS ALTURAS	)	Case No. 1151-A
1406 Morengo Court	)	
West Covina, CA 91790	)	
	)	
Civil Engineer License, No. C 28903,	)	
	)	
Respondent.	)	
_____	)	

**DECISION**

The attached Stipulated Settlement and Disciplinary 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 19, 2019.

IT IS SO ORDERED June 13, 2019.

*Original Signed*

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

1 XAVIER BECERRA  
Attorney General of California  
2 ARMANDO ZAMBRANO  
Supervising Deputy Attorney General  
3 KEVIN J. SCHETTIG  
Deputy Attorney General  
4 State Bar No. 234240  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 269-6272  
6 Facsimile: (213) 897-2804  
*Attorneys for Complainant*  
7

8 **BEFORE THE**  
9 **BOARD FOR PROFESSIONAL ENGINEERS, LAND SURVEYORS, AND**  
10 **GEOLOGISTS**  
11 **DEPARTMENT OF CONSUMER AFFAIRS**  
12 **STATE OF CALIFORNIA**

13 In the Matter of the Accusation Against:

Case No. C 28903

14 **CHRIS PHILIPPS ALTURAS**  
15 **1406 Marengo Court**  
16 **West Covina, CA 91790**

**STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER**

17 **Civil Engineer License No. C 28903**

Respondent.

18  
19  
20 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
21 entitled proceedings that the following matters are true:

22 **PARTIES**

23 1. Richard B. Moore, PLS (“Complainant”) is the Executive Officer of the Board for  
24 Professional Engineers, Land Surveyors, and Geologists (“Board”). He brought this action solely  
25 in his official capacity and is represented in this matter by Xavier Becerra, Attorney General of  
26 the State of California, by Kevin J. Schettig, Deputy Attorney General.

27 2. Respondent Chris Philipps Alturas (“Respondent”) is representing himself in this  
28 proceeding and has chosen not to exercise his right to be represented by counsel.



1 CONTINGENCY

2 11. This stipulation shall be subject to approval by the Board. Respondent understands  
3 and agrees that counsel for Complainant and the staff of the Board may communicate directly  
4 with the Board regarding this stipulation and settlement, without notice to or participation by  
5 Respondent. By signing the stipulation, Respondent understands and agrees that he may not  
6 withdraw his agreement or seek to rescind the stipulation prior to the time the Board considers  
7 and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the  
8 Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this  
9 paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not  
10 be disqualified from further action by having considered this matter.

11 12. The parties understand and agree that Portable Document Format (“PDF”) and  
12 facsimile copies of this Stipulated Settlement and Disciplinary Order, including PDF and  
13 facsimile signatures thereto, shall have the same force and effect as the originals.

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

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

23 DISCIPLINARY ORDER

24 IT IS HEREBY ORDERED that Civil Engineer License No. C 28903 issued to Respondent  
25 Chris Philipps Alturas is revoked. However, the revocation is stayed and Respondent is placed on  
26 probation for three (3) years on the following terms and conditions.

27 1. **Obey All Laws.** The Respondent shall obey all laws and regulations related to the  
28 practices of professional engineering and professional land surveying.



1           2.     **Submit Reports.** The Respondent shall submit such special reports as the Board may  
2 require.

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

7           4.     **Violation of Probation.** If the Respondent violates the probationary conditions in  
8 any respect, the Board, after giving the Respondent notice and the opportunity to be heard, may  
9 vacate the stay and reinstate the disciplinary order which was stayed. If, during the period of  
10 probation, an accusation or petition to vacate stay is filed against the Respondent, or if the matter  
11 has been submitted to the Office of the Attorney General for the filing of such, the Board shall  
12 have continuing jurisdiction until all matters are final, and the period of probation shall be  
13 extended until all matters are final.

14          5.     **Completion of Probation.** Upon successful completion of all of the probationary  
15 conditions and the expiration of the period of probation, the Respondent's Civil Engineer License  
16 No. C 28903 shall be unconditionally restored.

17          6.     **Administrative Fine.** Within one and one-half (1 ½) years from the effective date of  
18 the decision, the Respondent shall pay the administrative fine of \$5,000.00 as ordered in Citation  
19 Order 10467-L. Said fine may be paid in installments.

20          7.     **Cost Recovery.** Within one and one-half (1 ½) years from the effective date of the  
21 decision, the Respondent shall reimburse the Board for its investigative and enforcement costs in  
22 this matter in the amount of \$7,035.00. Said reimbursement may be paid in installments.

23          8.     **Examination.** Within sixty (60) days of the effective date of the decision, the  
24 Respondent shall successfully complete and pass the California Laws and Board Rules  
25 examination, as administered by the Board.

26          9.     **Ethics Course.** Within one (1) year from the effective date of the decision, the  
27 Respondent must successfully complete and pass a course in professional ethics, approved in  
28 advance by the Board or its designee.

1           10. **Notification.** Within thirty (30) days of the effective date of the decision, the  
2 Respondent shall provide the Board with evidence that he has provided all persons or entities with  
3 whom he has a contractual or employment relationship such that the relationship is in the area of  
4 practice of professional engineering and/or professional land surveying in which the violation  
5 occurred with a copy of the decision and order of the Board and shall provide the Board with the  
6 name and business address of each person or entity required to be so notified. During the period  
7 of probation, the Respondent may be required to provide the same notification of each new  
8 person or entity with whom he has a contractual or employment relationship such that the  
9 relationship is in the area of practice of professional engineering and/or land surveying in which  
10 the violation occurred and shall report to the Board the name and address of each person or entity  
11 so notified.

12           11. **Records.** Within sixty (60) days from the effective date of the decision, the  
13 Respondent shall resubmit Record of Survey 2008-1173 to the Orange County Surveyor's Office.  
14 The Respondent shall provide the Board proof of having submitted the map within thirty (30)  
15 days of the resubmittal. Furthermore, the Respondent shall comply with all pertinent provisions  
16 of the Business and Professions Code in order to complete the filing process for the subject map.  
17 The Respondent shall provide the Board with a copy of the map as filed with the County  
18 Recorder.

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**ACCEPTANCE**

I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the stipulation and the effect it will have on my Civil Engineer License. I enter into this Stipulated Settlement and Disciplinary 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: March 25, 2019

*Original Signed*

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CHRIS PHILIPPS ALTURAS  
*Respondent*

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**ENDORSEMENT**

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

Dated: *March 27, 2019*

Respectfully submitted,  
XAVIER BECERRA  
Attorney General of California  
ARMANDO ZAMBRANO  
Supervising Deputy Attorney General

*Original Signed*

KEVIN J. SCHETTIG  
Deputy Attorney General  
*Attorneys for Complainant*

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**Exhibit A**

**Accusation No. C 1151-A**

1 XAVIER BECERRA  
Attorney General of California  
2 ARMANDO ZAMBRANO  
Supervising Deputy Attorney General  
3 KEVIN J. SCHETTIG  
Deputy Attorney General  
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7

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

11 In the Matter of the Accusation Against:

Case No. 1151-A

12 **CHRIS PHILIPPS ALTURAS**  
13 **1406 Marengo Court**  
**West Covina, CA 91790**

**ACCUSATION**

14 **Civil Engineer License No. C 28903**

15 Respondent.  
16

17  
18  
19 Complainant alleges:

20 **PARTIES**

21 1. Richard B. Moore, PLS (“Complainant”) brings this Accusation solely in his official  
22 capacity as the Executive Officer of the Board for Professional Engineers, Land Surveyors, and  
23 Geologists, Department of Consumer Affairs (“Board”).

24 2. On or about July 12, 1978, the Board issued Civil Engineer License Number C 28903  
25 to Chris Philipps Alturas (“Respondent”). The Civil Engineer License expired on March 31,  
26 2017, and has not been renewed due to Respondent’s failure to comply with Citation Order  
27 10467-L, as set forth below.

28 ///

1 **JURISDICTION**

2 3. This Accusation is brought before the Board under the authority of the following  
3 laws. All section references are to the Business and Professions Code unless otherwise indicated.

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

8 5. Section 6775 of the Code states, in pertinent part:

9 “The board may, upon its own initiative or upon the receipt of a complaint, investigate the  
10 actions of any professional engineer licensed under this chapter and make findings thereon.

11 By a majority vote, the board may publicly reprove, suspend for a period not to exceed two  
12 years, or revoke the certificate of any professional engineer licensed under this chapter on any of  
13 the following grounds:

14 . . . .

15 (h) A violation of any provision of this chapter or any other law relating to or involving the  
16 practice of professional engineering.”

17 **STATUTORY PROVISIONS**

18 6. Section 8767 of the Code states:

19 “If the county surveyor finds that the record of survey complies with the examination in  
20 Section 8766, the county surveyor shall endorse a statement on it of his or her examination, and  
21 shall present it to the county recorder for filing. Otherwise the county surveyor shall return it to  
22 the person who presented it, together with a written statement of the changes necessary to make it  
23 conform to the requirements of Section 8766. The licensed land surveyor or registered civil  
24 engineer submitting the record of survey may then make the agreed changes and note those  
25 matters which cannot be agreed upon in accordance with the provisions of Section 8768 and shall  
26 resubmit the record of survey within 60 days, or within the time as may be mutually agreed upon  
27 by the licensed surveyor or registered engineer and the county surveyor, to the county surveyor  
28 for filing pursuant to Section 8768.”





1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Failure to Comply with Citation Order)**

3 10. Respondent is subject to disciplinary action under section California Code of  
4 Regulations, title 16, section 473.3, subdivision (b), on the grounds that Respondent failed to  
5 comply with the citation the Board issued to him, as follows:

6 11. On or about December 7, 2015, the Board issued Citation Order 10467-L to  
7 Respondent for violating the Professional Land Surveyors' Act (Business and Professions Code  
8 section 8700, et seq.) related to a project identified as Record of Survey 2008-1173. The facts  
9 underlying the Citation Order are that on or about December 29, 2008, the Orange County  
10 Surveyor's Office returned to Respondent the map pertaining to the Record of Survey 2008-1173  
11 for corrections. However, Respondent failed to resubmit the record of survey in accordance with  
12 the law. In failing to resubmit the record of survey within sixty (60) days of the map being  
13 returned for corrections, Respondent violated Code section 8767.

14 12. Citation Order 10467-L contained an Order of Abatement requiring that Respondent  
15 comply with the law and ensure that he does not violate Code section 8767 in the future.  
16 Additionally, the Citation required Respondent to resubmit Record of Survey 2008-1173 to the  
17 Orange County Surveyor's Office and provide evidence to the Board once Respondent had  
18 completed the recordation process. The Citation included an Order to Pay Administrative Fine in  
19 the amount of \$5,000.00 with payment required within thirty (30) days of the date the Citation  
20 became final. Respondent did not appeal the Citation and it became final on January 6, 2016.

21 13. To date, Respondent has failed to provide the Board with evidence that he has  
22 resubmitted Record of Survey 2008-1173 nor has he paid the administrative fine pursuant to the  
23 terms of Citation Order 10467-L.

24 **SECOND CAUSE FOR DISCIPLINE**

25 **(Aiding/Abetting in the Unlicensed Practice of Professional Engineering)**

26 14. Respondent is subject to disciplinary action under section 6775, subdivision (f), on  
27 the grounds that Respondent aided and abetted the unlicensed practice of professional  
28 engineering, as follows:

1           15. During the investigation of this matter, the Board became aware of Respondent's  
2 involvement with ECM Group, Inc. ("ECM Group"). On or about March 8, 2017, the Board  
3 received an updated Organization Record form from Hector Castillo, an unlicensed individual, for  
4 ECM Group, identifying Respondent as the Civil Engineer in responsible charge of the  
5 professional engineering services offered by ECM Group.

6           16. On or about July 25, 2017, the Board sent a letter to Respondent notifying him of the  
7 review of ECM Group's Organization Record form and requesting Respondent's written response  
8 regarding his involvement with ECM Group. In addition, the Board reminded Respondent that  
9 his civil engineering license had expired on March 31, 2017 and that until his license was  
10 renewed, Respondent was not authorized to practice professional engineering. Further, the Board  
11 stated that without a licensee in responsible charge of the services being offered, ECM Group was  
12 not authorized to offer or practice any services related to the practice of civil engineering.

13           17. On or about July 30, 2017, Respondent provided a written response to the Board  
14 admitting that he had been working with ECM Group after the expiration of his license on March  
15 31, 2017.

#### **DISCIPLINARY CONSIDERATIONS**

16  
17           18. To determine the degree of discipline, if any, to be imposed on Respondent,  
18 Complainant alleges that on or about September 10, 2010, in a prior disciplinary action entitled *In*  
19 *the Matter of the Accusation Against Chris Philipps Alturas* before the Board in Case Number  
20 840-A, pursuant to the Board's Decision adopting a Stipulated Settlement and Disciplinary Order,  
21 Respondent's license was revoked. However, the revocation was stayed and Respondent was  
22 placed on probation for four (4) years subject to certain terms and conditions.

23           19. Accusation No. 840-A charged Respondent with the following allegations to support  
24 causes for discipline: 1) aiding and abetting the unlicensed practice of professional engineering  
25 and land surveying; 2) forming a corporation containing the name of a person not licensed as a  
26 professional engineer, land surveyor, architect or geologist; 3) failing to record a survey; 4)  
27 committing negligence or incompetence in the practice of land surveying; 5) committing  
28 negligence or incompetence in the practice of civil engineering, in that Respondent's contract

1 lacked provisions for additional services and the process for termination of the contract; 6)  
2 breaching a contract to provide land surveying services; and 7) committing fraud, deceit or  
3 misrepresentation.

4 20. The Board's Decision in Case Number 840-A is now final and is incorporated by  
5 reference as if fully set forth.

6 **PRAYER**

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

10 1. Revoking or suspending Civil Engineer License Number C 28903, issued to Chris  
11 Philipps Alturas;

12 2. Ordering Chris Philipps Alturas to pay the Board for Professional Engineers, Land  
13 Surveyors, and Geologists the reasonable costs of the investigation and enforcement of this case,  
14 pursuant to Business and Professions Code section 125.3; and,

15 3. Taking such other and further action as deemed necessary and proper.

16  
17 DATED: 7/11/18

*Original Signed*

18 RICHARD B. MOORE, PLS  
19 Executive Officer  
20 Board for Professional Engineers, Land Surveyors, and  
21 Geologists  
22 Department of Consumer Affairs  
23 State of California  
24 *Complainant*

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