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

12  
13 In the Matter of the Accusation Against:

Case No. 1240-A

14 **ROBERTO GERRARDO MARTINEZ**  
15 **908 Waverly Place**  
**West Covina, CA 91790**

**FIRST AMENDED ACCUSATION**

16 **Land Surveyor License No. L 6966**  
17 **Civil Engineer License No. C 54360**

18 Respondent.

19  
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.

24 2. On or about July 16, 1993, the Board for Professional Engineers, Land Surveyors,  
25 and Geologists issued Land Surveyor License Number L 6966 to Roberto Gerrardo Martinez  
26 (Respondent). The Land Surveyor License was in full force and effect at all times relevant to the  
27 charges brought herein and will expire on September 30, 2021, unless renewed.  
28

1           3. On or about July 14, 1995, the Board for Professional Engineers, Land Surveyors,  
2 and Geologists issued Civil Engineer License Number C 54360 to Roberto Gerrardo Martinez  
3 (Respondent). The Civil Engineer License was in full force and effect at all times relevant to the  
4 charges brought herein and will expire on December 31, 2021, unless renewed.

5   **JURISDICTION**

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

10          5. Section 8790 of the Code states:

11           The board shall enforce all of the provisions of this chapter and cause the prosecution of all  
12 violations coming to its notice.

13          6. Section 8705 of the Code provides:

14           “Board” refers to the Board of Professional Engineers, Land Surveyors, and Geologists.

15   **STATUTORY PROVISIONS**

16          7. Section 8703 of the Code provides:

17           The phrase “responsible charge of work” means the independent control and direction, by  
18 the use of initiative, skill, and independent judgment, of the observations, measurements, and  
19 descriptions involved in land surveying work. The phrase does not refer to the concept of  
20 financial liability.

21          8. Section 8704 of the Code states:

22           Any person practices land surveying when he professes to be a land surveyor or is in  
23 responsible charge of land surveying work.

24          9. Section 8726 of the Code states, in pertinent part:

25           A person, including any person employed by the state or by a city, county, or city and  
26 county within the state, practices land surveying within the meaning of this chapter who,  
27 either in a public or private capacity, does or offers to do any one or more of the  
28 following:

...

(c) Locates, relocates, establishes, reestablishes, or retraces any property line or  
boundary of any parcel of land, right-of-way, easement, or alignment of those lines or  
boundaries.

1 ...

2 (e) By the use of the principles of land surveying determines the position for any  
3 monument or reference point which marks a property line, boundary, or corner, or  
4 sets, resets, or replaces any monument or reference point.

5 ...

6 (g) Determines the information shown or to be shown on any map or document  
7 prepared or furnished in connection with any one or more of the functions described in  
8 subdivisions (a), (b), (c), (d), (e), and (f).

9 (h) Indicates, in any capacity or in any manner, by the use of the title "land surveyor"  
10 or by any other title or by any other representation that he or she practices or offers to  
11 practice land surveying in any of its branches.

12 (i) Procures or offers to procure land surveying work for himself, herself, or others.

13 ...

14 (l) Determines the information shown or to be shown within the description of any  
15 deed, trust deed, or other title document prepared for the purpose of describing the  
16 limit of real property in connection with any one or more of the functions described in  
17 subdivisions (a) to (f), inclusive.

18 (m) Creates, prepares, or modifies electronic or computerized data in the  
19 performance of the activities described in subdivisions (a), (b), (c), (d), (e), (f), (k),  
20 and (l).

21 (n) Renders a statement regarding the accuracy of maps or measured survey data.

22 ...

23 10. Section 8762 of the Code states:

24 (a) Except as provided in subdivision (b), after making a field survey in conformity with  
25 the practice of land surveying, the licensed surveyor or licensed civil engineer may file  
26 with the county surveyor in the county in which the field survey was made, a record of  
27 the survey.

28 (b) Notwithstanding subdivision (a), after making a field survey in conformity with the  
practice of land surveying, the licensed land surveyor or licensed civil engineer shall  
file with the county surveyor in the county in which the field survey was made a record  
of the survey relating to land boundaries or property lines, if the field survey discloses  
any of the following:

(1) Material evidence or physical change, which in whole or in part does not appear on  
any subdivision map, official map, or record of survey previously recorded or  
properly filed in the office of the county recorder or county surveying department,  
or map or survey record maintained by the Bureau of Land Management of the  
United States.

(2) A material discrepancy with the information contained in any subdivision map,  
official map, or record of survey previously recorded or filed in the office of the  
county recorder or the county surveying department, or any map or survey record  
maintained by the Bureau of Land Management of the United States. For purposes  
of this subdivision, a "material discrepancy" is limited to a material discrepancy in

the position of points or lines, or in dimensions.

- (3) Evidence that, by reasonable analysis, might result in materially alternate positions of lines or points, shown on any subdivision map, official map, or record of survey previously recorded or filed in the office of the county recorder or the county surveying department, or any map or survey record maintained by the Bureau of Land Management of the United States.
- (4) The location, relocation, establishment, reestablishment, or retracement of one or more points or lines not shown on any subdivision map, official map, or record of survey, the positions of which are not ascertainable from an inspection of the subdivision map, official map, or record of survey.
- (5) The points or lines set during the performance of a field survey of any parcel described in any deed or other instrument of title recorded in the county recorder's office are not shown on any subdivision map, official map, or record of survey.

(c) The record of survey required to be filed pursuant to this section shall be filed within 90 days after the setting of boundary monuments during the performance of a field survey or

(d)

(1) If the 90-day time limit contained in subdivision (c) cannot be complied with for reasons beyond the control of the licensed land surveyor or licensed civil engineer, the 90-day time period shall be extended until the time at which the reasons for delay are eliminated. If the licensed land surveyor or licensed civil engineer cannot comply with the 90-day time limit, he or she shall, prior to the expiration of the 90-day time limit, provide the county surveyor with a letter stating that he or she is unable to comply. The letter shall provide an estimate of the date for completion of the record of survey, the reasons for the delay, and a general statement as to the location of the survey, including the assessor's parcel number or numbers.

(2) The licensed land surveyor or licensed civil engineer shall not initially be required to provide specific details of the survey. However, if other surveys at the same location are performed by others which may affect or be affected by the survey, the licensed land surveyor or licensed civil engineer shall then provide information requested by the county surveyor without unreasonable delay.

(e) Any record of survey filed with the county surveyor shall, after being examined by him or her, be filed with the county recorder.

(f) If the preparer of the record of survey provides a postage-paid, self-addressed envelope or postcard with the filing of the record of survey, the county recorder shall return the postage-paid, self-addressed envelope or postcard to the preparer of the record of survey with the filing data within 10 days of final filing. For the purposes of this subdivision, "filing data" includes the date, the book or volume, and the page at which the record of survey is filed with the county recorder.

11. Section 8764 of the Code states:

The record of survey shall show the applicable provisions of the following consistent with the purpose of the survey:

(a) All monuments found, set, reset, replaced, or removed, describing their kind, size, and location, and giving other data relating thereto.

(b) Bearing or witness monuments, basis of bearings, bearing and length of lines, scale of

map, and north arrow.

1 (c) Name and legal designation of the property in which the survey is located, and the date  
or time period of the survey.

2 (d) The relationship to those portions of adjacent tracts, streets, or senior conveyances  
which have common lines with the survey.

3 (e) Memorandum of oaths.

4 (f) Statements required by Section 8764.5.

5 (g) Any other data necessary for the intelligent interpretation of the various items and  
locations of the points, lines, and areas shown, or convenient for the identification of the survey  
or surveyor, as may be determined by the civil engineer or land surveyor preparing the record of  
survey.

6 The record of survey shall also show, either graphically or by note, the reason or reasons, if  
any, why the mandatory filing provisions of paragraphs (1) to (5), inclusive, of subdivision (b) of  
7 Section 8762 apply.

8 The record of survey need not consist of a survey of an entire property.

9 12. Section 8780 of the Code states, in pertinent part:

10 The board may, upon its own initiative or upon the receipt of a complaint,  
investigate the actions of any land surveyor licensed under this chapter or any civil  
11 engineer licensed under the provisions of Chapter 7 (commencing with Section 6700)  
who is legally authorized to practice land surveying and make findings thereon.

12 By a majority vote, the board may publicly reprove, suspend for a period not to  
exceed two years, or revoke the license or certificate of any land surveyor licensed  
13 under this chapter or civil engineer licensed under the provisions of Chapter 7  
(commencing with Section 6700) who is legally authorized to practice land surveying  
14 on any of the following grounds:

15 ...

16 (b) Any negligence or incompetence in his or her practice of land surveying.

17 ...

18 (d) Any violation of any provision of this chapter or of any other law relating to  
or involving the practice of land surveying.

19 ...

20 (h) A violation in the course of the practice of land surveying of a rule or  
21 regulation of unprofessional conduct adopted by the board.

## 22 **REGULATORY PROVISIONS**

23 13. Title 16, section 404.2 of the California Code of Regulations states, in pertinent part:

24 (a) The term "responsible charge" directly relates to the extent of control a licensed land  
25 surveyor or civil engineer legally authorized to practice land surveying (hereinafter  
26 referred to as "legally authorized civil engineer") is required to maintain while exercising  
independent control and direction of land surveying work or services and the land  
27 surveying decisions which can be made only by a licensed land surveyor or legally  
authorized civil engineer.

28 (1) Extent of Control. The extent of control necessary to be in responsible charge

shall be such that the land surveyor or legally authorized civil engineer:

(A) Makes or review and approves the land surveying decisions defined and described in subdivision (a)(2) below.

(B) In making or reviewing and approving the land surveying decisions, determines the applicability of survey criteria and technical recommendations provided by others before incorporating such criteria or recommendations.

(2) Land Surveying Decisions. The term "responsible charge" relates to land surveying decisions within the purview of the Professional Land Surveyors' Act.

Land surveying decisions which must be made by and are the responsibility of the land surveyor or legally authorized civil engineer in responsible charge are those decisions concerning permanent or temporary work which could create a hazard to life, health, property, or public welfare, and may include, but are not limited to:

(A) Selecting the methods, procedures, and tolerances of field work.

(B) Determining calculation and adjustment methods.

(C) Determining and specifying the information to be shown on maps or documents furnished in connection with land surveying services, including the format of the information and the format of the maps or documents.

(D) The decisions related to the preparation of maps, plats, land surveying reports, descriptions, and other land surveying documents furnished in connection with the land surveying services.

(E) Reviewing the sufficiency and accuracy of the work product.

(3) Reviewing and Approving Land Surveying Decisions. In making or reviewing and approving land surveying decisions, the land surveyor or legally authorized civil engineer shall be physically present or shall review and approve through the use of communication devices the land surveying decisions prior to their implementation.

(b) Responsible Charge Criteria. In order to evaluate whether a person authorized to practice land surveying is in responsible charge, the following must be considered: The land surveyor or legally authorized civil engineer who signs surveying documents must be capable of answering questions asked by licensees of the Board who are fully competent and proficient by education and experience in the field or fields of professional land surveying relevant to the project. These questions would be relevant to the decisions made during the individual's participation in the project, and in sufficient detail to leave little question as to the land surveyor's or legally authorized civil engineer's technical knowledge of the work performed. It is not necessary to defend decisions as in an adversarial situation, but only to demonstrate that the individual in responsible charge made, or reviewed and approved, them and possessed sufficient knowledge of the project to make, or review and approve, them.

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1 **COST RECOVERY**

2 14. Section 125.3 of the Code provides, in pertinent part, that the Board may request the  
3 administrative law judge to direct a licensee found to have committed a violation or violations of  
4 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
5 enforcement of the case, with failure of the licensee to comply subjecting the license to not being  
6 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be  
7 included in a stipulated settlement.

8 **FACTUAL ALLEGATIONS**

9 15. At all times alleged herein, homeowners G.P. and J.P. owned a parcel of land on  
10 Stoneridge Drive in Pasadena, California (GP Parcel). Homeowner J.A. owned an adjacent parcel  
11 of land to the north of the GP Parcel (JA Parcel).

12 16. In or around 1948, Tract No. 14851 was recorded in Book 315 of Maps at Pages 19-  
13 20. This map subdivided a portion of a pre-existing parcel into approximately fourteen residential  
14 parcels. These parcels included three consecutive lots along Stoneridge Drive, two of which  
15 eventually became the GP Parcel and the JA Parcel. Stoneridge Drive and a four foot wide walk  
16 (4 ft. Walk) were offered for dedication and accepted by the City of Pasadena (City) on behalf of  
17 the public.

18 17. In or around 1949, the City adopted Resolution No. 7527, which vacated a westerly  
19 portion of Arlington Drive (1949 Vacation). The City retained the southerly four feet of  
20 Arlington Drive as an extension of the 4 ft. Walk. Subsequent maps showed the vacated lands  
21 merged with what became the GP Parcel.

22 18. At some point, the southerly three feet of the parcel that became the JA Parcel was  
23 merged with the parcel that became the GP Parcel. The boundary between the parcels was thus  
24 offset by three feet (3 ft. Offset Boundary).

25 19. In or around January of 2010, Respondent conducted a survey of the GP Parcel (2010  
26 Survey).

1           20. On or about October 30, 2013, Land Surveyor Y.L. filed a Record of Survey which  
2 showed that a driveway, fence, and garage serving the GP Parcel encroached northerly across the  
3 3 ft. Offset Boundary (Encroachments).

4           21. In or around November of 2013, Respondent updated the 2010 Survey and prepared a  
5 plat entitled “Topographic Survey” (2013 Plat). The 2013 Plat showed several found monuments,  
6 boundaries, and topography. The Encroachments were shown along the 3 ft. Offset Boundary,  
7 along with other encroachments into the 4 ft. Walk, Arlington Drive and other parcels.  
8 Respondent overlooked two other surveys (RS 243-81 and RS 244-77) when he prepared his  
9 2013 Plat. The 3 ft. Offset Boundary had already been shown on previous surveys. However, the  
10 1949 Vacation had not been shown on any previous recorded maps and thus required Respondent  
11 to file a Record of Survey.

12           22. In or around 2015, G.P. sought to resolve his encroachment issues with J.A. In order  
13 to do so, Homeowner G.P. agreed to pay Homeowner J.A. for the disputed land (Encroachment  
14 Lands) and applied to the City for its concurrence on the lot line adjustment (LLA). Respondent  
15 prepared related land surveying documents, including legal descriptions and exhibits.

16           23. On or about August 11, 2015, Respondent filed a Record of Survey for his survey of  
17 the then-existing GP Parcel in book 273 of Land Surveys at Page 71 (RS 273-71).

18           24. On or about September 3, 2015, the City approved the LLA. The City issued  
19 Certificates of Compliance for the resulting new parcels. On or about September 8, 2015, the  
20 City recorded the Certificates of Compliance, including the new legal descriptions.

21           25. On or about November 13, 2015, Homeowner J.A. signed documents to convey the  
22 Encroachment Lands to Homeowner G.P. A grant deed and legal description were recorded to  
23 create the new GP Parcel. A new boundary was created between Homeowner J.A.’s property and  
24 the GP Parcel (Adjusted Boundary). The Adjusted Boundary was created with a metes-and-  
25 bounds legal description and was not initially shown on a record map.

26           26. At some time during the first six months of 2017, Homeowner G.P. sought to clear  
27 title to a four-foot walk on the southern border of the GP Parcel and a portion of Arlington Drive  
28 which he and his predecessors in title had long occupied but on which public easements



1 remained. Homeowner G.P. petitioned the City to abandon and vacate those public easements.  
2 Homeowner G.P. retained Respondent to prepare related documents, including a drawing and  
3 legal description. Homeowner G.P. submitted an Application for Vacation of Public Right-of-  
4 Way on or about June 7, 2017.

5 27. On or about August 29, 2017, Respondent set monuments along the Adjusted  
6 Boundary (Respondent's Pins). Respondent prepared a draft Record of Survey but did not submit  
7 it to the County of Los Angeles (County). The draft Record of Survey showed record data plus  
8 the Adjusted Boundary and Respondent's Pins.

9 28. On or about November 9, 2018, a deed was recorded conveying the new GP Parcel  
10 from Homeowner G.P. to Homeowner G.P. Respondent signed and stamped the attached legal  
11 description.

12 29. On or about February 25, 2019, Respondent sent a letter to the County. In that letter,  
13 Respondent stated that he had been asked to monument the Adjusted Boundary but had held off  
14 on filing the map because his client, Homeowner G.P., had entered into negotiations with the City  
15 to obtain additional property through a proposed street vacation. Respondent stated that he had  
16 been waiting for the process to be finalized before proceeding. Respondent further stated that he  
17 could not say how much longer it would take for his client to accomplish the modifications but  
18 that he would move forward with the filing and recordation if the modifications continued to be  
19 delayed.

20 30. On or about February 27, 2019, the County advised Respondent that it had received  
21 his letter regarding the reason for the delay in submitting the Record of Survey map for the GP  
22 Parcel. The correspondence requested that Respondent keep the County informed of  
23 developments.

24 31. In an email to Homeowner J.A. dated on or about August 26, 2019, a representative  
25 of the County confirmed that the County had not recorded a Record of Survey for the GP Parcel  
26 since RS 273-71, which had been recorded on or about August 11, 2015.

27  
28

1 32. On or about December 10, 2019, the Board sent a letter to Respondent reminding him  
2 that, as the licensed land surveyor in responsible charge for the GP Parcel, he had the burden to  
3 fulfill his filing requirements in a timely manner.

4 33. On or about January 31, 2020, the Board sent Respondent a letter advising him that  
5 his client's negotiations with the City regarding the acquisition of additional land had no bearing  
6 on Respondent's duty to timely file the Record of Survey related to the Adjusted Boundary.

7 34. The County did not receive the Record of Survey related to the Adjusted Boundary  
8 from Respondent until on or about July 23, 2020.

9 35. Homeowner J.A. subsequently retained Licensed Land Surveyor N.H. to perform a  
10 boundary survey. Land Surveyor N.H. discovered that Respondent had mischaracterized three of  
11 Respondent's Pins in the Record of Survey filed by Respondent on or about August 24, 2020. On  
12 or about September 23, 2020, N.H. filed a Corner Record (Corner Record) accurately describing  
13 the monuments found on the Adjusted Boundary.

14 36. Following the filing of the Corner Record, Respondent prepared a Certificate of  
15 Correction, which largely restated the information contained in the Corner Record. In the  
16 Certificate of Correction, Respondent admitted that the Record of Survey filed by Respondent on  
17 or about August 24, 2020 had mischaracterized three of the monuments placed by Respondent.

### **FIRST CAUSE FOR DISCIPLINE**

(Negligence in the Practice of Land Surveying)

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19  
20 37. Respondent is subject to disciplinary action under Code section 8780, subdivision (b),  
21 in conjunction with Code section 8762, subdivisions (b), (c), and (d), and Code section 8764, in  
22 that Respondent failed to maintain a professional standard of care on the GP Parcel project.  
23 Pursuant to Code section 8703 and title 16, section 404.2 of the California Code of Regulations,  
24 Respondent was the land surveyor in responsible charge of the GP Parcel project. Respondent  
25 failed to conduct thorough research and field surveys to locate controlling monuments in the 2010  
26 Survey and as shown on the 2013 Plat. Respondent failed to resolve boundaries in conformance  
27 with conventional methods on the 2013 Plat. Respondent failed to timely file Records of Survey  
28 after the 2010 Survey, after the 2013 Plat, and after setting Respondent's Pins in 2017.

1 Respondent also failed to comply with the requirements of Code section 8762, subdivision (d)(1).  
2 Furthermore, the Record of Survey filed by Respondent in 2020 mischaracterized monuments  
3 placed by Respondent in violation of Code section 8764, subdivision (a). Complaint realleges  
4 paragraphs 15 through 36.

5 **SECOND CAUSE FOR DISCIPLINE**

6 (Violation of Law Relating to the Practice of Land Surveying)

7 38. Respondent is subject to disciplinary action under Code section 8780, subdivision (d),  
8 in conjunction with Code section 8762, subdivisions (b), (c), and (d), and Code section 8764, in  
9 that Respondent failed to timely file the required Records of Survey. In addition, Respondent  
10 also failed to comply with the requirements of Code section 8762, subdivision (d)(1).  
11 Furthermore, the Record of Survey filed by Respondent mischaracterized monuments placed by  
12 Respondent in violation of Code section 8764, subdivision (a). Complaint realleges paragraphs  
13 15 through 36.

14 **PRIOR CITATIONS**

15 39. To determine the degree of discipline, if any, to be imposed on Respondent,  
16 Complainant alleges the following:

17 40. On or about August 9, 2011, in a prior action, Modified Citation Order 10032-L  
18 against Respondent became final. Modified Citation Order 10032-L required Respondent to pay  
19 a \$1,000 fine for the violation of Code sections 8759, 8761, and 8762, subdivision (b)(5).  
20 Respondent was ordered to cease and desist from violating said Code sections in the future, to file  
21 a Record of Survey for the subject project, and to ensure that all future Records of Surveys are  
22 filed within the requisite timeframe.

23 41. On or about September 8, 2014, in a prior action, Citation Order 10363-L against  
24 Respondent became final. Citation Order 10363-L required respondent to pay a \$1,000 fine for  
25 the violation of Code sections 8759 and 8762, subdivision (c). Respondent was ordered to cease  
26 and desist from violating said Code sections in the future.

27 42. On or about April 9, 2015, in a prior action involving the Stoneridge Drive Parcel,  
28 Citation Order 10403-L against Respondent became final. Citation Order 10403-L required

1 respondent to pay a \$2,500 fine for the violation of Code sections 8759, subdivision (a), and  
2 8762, subdivisions (b)(1), (b)(4), (c), and (d). Respondent was ordered to cease and desist from  
3 violating said Code sections in the future, to file a Record of Survey to document the work  
4 Respondent performed in or around January 2010 related to the Stoneridge Drive Parcel, and to  
5 complete the map recordation process in accordance with the law.

6 **PRIOR DISCIPLINE**

7 43. Effective on or about December 11, 2015, in Case No. 1049-A, Respondent's Land  
8 Surveyor License was revoked, with the revocation stayed and Respondent's license placed on  
9 probation for three (3) years upon terms and conditions. In a Stipulated Settlement and  
10 Disciplinary Order, Respondent admitted that he had failed to timely record the Record of Survey  
11 required by Modified Citation Order 10032-L and had failed to timely pay the related fine.  
12 Respondent also admitted that he had failed to timely record the Record of Survey required by  
13 Citation 10403-L and had failed to pay the related fine.

14 **PRAAYER**

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

- 18 1. Revoking or suspending Land Surveyor License Number L 6966, issued to Roberto  
19 Gerrardo Martinez;
- 20 2. Ordering Roberto Gerrardo Martinez to pay the Board for Professional Engineers,  
21 Land Surveyors, and Geologists the reasonable costs of the investigation and enforcement of this  
22 case, pursuant to Business and Professions Code section 125.3; and,  
23 ///  
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25 ///  
26 ///
- 27 3. Taking such other and further action as deemed necessary and proper.

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DATED: 6/23/2021

*Original Signed*

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RICHARD B. MOORE, PLS  
Executive Officer  
Board for Professional Engineers, Land  
Surveyors, and Geologists  
Department of Consumer Affairs  
State of California  
*Complainant*

LA2020602126