

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

In the Matter of the First Amended Accusation )  
against: )  
 )  
KACIE ALLISON PLOUFF )  
25570 Rye Canyon Road )  
Valencia, CA 91355 )  
 )  
Land Surveyor License, No. L 9013, )  
 )  
Respondent. )  
\_\_\_\_\_ )

Case No. 1220-A

**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 September 24, 2020.

IT IS SO ORDERED August 20, 2020.

*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 SHAWN P. COOK  
Supervising Deputy Attorney General  
3 MARIO CUAHUTLE  
Deputy Attorney General  
4 State Bar No. 305067  
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5 Los Angeles, CA 90013  
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E-mail: Mario.Cuahutle@doj.ca.gov  
7 *Attorneys for Complainant*

8  
9 **BEFORE THE**  
**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:

14 **KACIE ALLISON PLOUFF**  
15 **25570 Rye Canyon Road, Suite A**  
16 **Valencia, CA 91355**  
17 **Land Surveyor License No. L 9013**

18 Respondent.

Case No. 1220-A

OAH No. 2020050780

**STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER**

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 in  
25 his official capacity and is represented in this matter by Xavier Becerra, Attorney General of the  
26 State of California, by Mario Cuahutle, Deputy Attorney General.

27 2. Respondent Kacie Allison Plouff (Respondent) is representing herself in this  
28 proceeding and has chosen not to exercise her right to be represented by counsel.





1 probation for two (2) years on the following terms and conditions:

2 1. Within one (1) year from the effective date of the decision, the Respondent must  
3 successfully complete and pass a course in professional ethics, approved in advance by the Board  
4 or its designee.

5 2. Within one (1) year from the effective date of the decision, the Respondent shall  
6 reimburse the Board for its enforcement costs in this matter in the amount of \$4,097.50, as  
7 charged by the Office of the Attorney General up to the date of this settlement offer. Payments  
8 may be made in installments.

9 3. Within one (1) year from the effective date of the decision, the Respondent will  
10 comply with Citation Order 10826-L by paying the administrative fine of \$1,000.00 as ordered.

11 4. Within sixty (60) days from the effective date of the decision, the Respondent shall  
12 successfully complete and pass the California Laws and Board Rules examination, as  
13 administered by the Board.

14 5. Within thirty (30) days from the effective date of the decision, the Respondent shall  
15 provide the Board with evidence that she has provided all persons or entities with whom she has a  
16 contractual or employment relationship relating to professional land surveying services with a  
17 copy of the decision and order of the Board and shall provide the Board with the name and  
18 business address of each person or entity required to be so notified. During the period of  
19 probation, the Respondent may be required to provide the same notification to each new person or  
20 entity with whom she has a contractual or employment relationship relating to professional land  
21 surveying services and shall report to the Board the name and address of each person or entity so  
22 notified.

23 6. The Respondent shall obey all federal, state, and local laws and regulations related to  
24 the practices of professional engineering and land surveying.

25 7. The Respondent shall submit such special reports as the Board may require.

26 8. The period of probation shall be tolled during the time the Respondent is practicing  
27 exclusively outside the state of California. If, during the period of probation, the Respondent  
28 practices exclusively outside the state of California, the Respondent shall immediately notify the

1 Board in writing.

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

8 10. Upon successful completion of all of the probationary conditions and the expiration  
9 of the period of probation, the Respondent's Land Surveyor License, No. L 9013, shall be  
10 unconditionally restored.

11 **ACCEPTANCE**

12 I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the  
13 stipulation and the effect it will have on my Land Surveyor License. I enter into this Stipulated  
14 Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be  
15 bound by the Decision and Order of the Board for Professional Engineers, Land Surveyors, and  
16 Geologists.

17  
18 DATED: 8/30/2020 *Original Signed*  
19 KACIE ALLISON PLOUFF  
20 *Respondent*

21 **ENDORSEMENT**

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

DATED: 08/07/2020

Respectfully submitted,

XAVIER BECERRA  
Attorney General of California  
SHAWN P. COOK  
Supervising Deputy Attorney General

/s/Mario Cuahutle  
MARIO CUAHUTLE  
Deputy Attorney General  
*Attorneys for Complainant*

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**Exhibit A**

**Accusation No. 1220-A**



1 XAVIER BECERRA  
Attorney General of California  
2 SHAWN P. COOK  
Supervising Deputy Attorney General  
3 MARIO CUAHUTLE  
Deputy Attorney General  
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6 Facsimile: (916) 731-2126  
*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**

12 In the Matter of the First Amended Accusation  
13 Against:

Case No. 1220-A

**FIRST AMENDED ACCUSATION**

14 **KACIE ALLISON PLOUFF**  
25570 Rye Canyon Road, A  
15 Valencia, CA 91355

16 **Land Surveyor License No. L 9013**

17 Respondent.  
18

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 (Board), Department of Consumer Affairs.

24 2. On or about May 29, 2013, the Board issued Land Surveyor License Number L 9013  
25 to Kacie Allison Plouff (Respondent). The Land Surveyor License was in full force and effect at  
26 all times relevant to the charges brought herein and will expire on September 30, 2021, unless  
27 renewed.

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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 (Code) unless otherwise  
4 indicated.

5 4. Section 8762 of the Code states, in pertinent part:

6 . . .

7 (b) Notwithstanding subdivision (a), after making a field survey in conformity  
8 with the practice of land surveying, the licensed land surveyor or licensed civil  
9 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:

10 . . .

11 (4) The location, relocation, establishment, reestablishment, or retracement of  
12 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  
13 subdivision map, official map, or record of survey.

14 (5) The points or lines set during the performance of a field survey of any  
15 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.

16 **REGULATORY PROVISIONS**

17 5. California Code of Regulations, title 16, section 473.3(b) states:

18 Failure of the cited person to abate the violation or to pay all of the assessed  
19 fine within the time allowed is grounds for suspension or revocation of the cited  
person's license.

20 **COST RECOVERY**

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

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**FACTUAL ALLEGATIONS**

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2           7.     On or about April 26, 2019, the Board issued Citation Order No. 10737-L to  
3 Respondent. Citation No. 10737-L contained an order of abatement requiring Respondent to  
4 comply with the law and ensure that Respondent does not violate Code sections 8762(b)(4) and  
5 (5) in the future. Respondent was further ordered to submit a record of survey related to property  
6 identified as 3380 Scadlock Lane, Los Angeles, California, to the Los Angeles County Surveyor’s  
7 Office and to provide a copy of the submitted record of survey to the Board Office within thirty  
8 (30) days of the date the citation became final. In addition, Respondent was required to complete  
9 the map recordation process in accordance with the law and to provide a copy of the final record  
10 of survey to the Board Office within thirty (30) days of the date the record of survey is filed with  
11 the Los Angeles County Recorder’s Office. Respondent was ordered to pay an administrative  
12 fine in the amount of \$1,000 within thirty (30) days of the date the citation becomes final.

13           8.     On or about May 24, 2019, the Board received a letter and a check in the amount of  
14 \$1,000 to pay the administrative fine. Respondent included a copy of a record of survey,  
15 claiming it had been submitted to Los Angeles County Surveyor’s Office.

16           9.     On or about December 18, 2019, the Board contacted Los Angeles County  
17 Department of Public Works to check on the status of the filing of the subject record of survey  
18 and confirmed the subject record of survey has not been submitted to Los Angeles County.

19           10.    On or about March 19, 2020, the Board issued Citation Order No. 10826-L to  
20 Respondent. Citation No. 10826-L contained an order of abatement requiring Respondent to  
21 comply with the law and ensure that Respondent does not violate Code section 8780(b) in the  
22 future. Respondent was ordered to pay an administrative fine in the amount of \$1,000 within  
23 thirty (30) days of the date the citation becomes final. This Citation became a final order of the  
24 Board thirty (30) days after the date of issuance. Respondent failed to pay all of the assessed fine  
25 within the time allowed.

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**FIRST CAUSE FOR DISCIPLINE**

**(Failure to Comply with the Board's Order)**

11. Respondent is subject to disciplinary action under California Code of Regulations, title 16, section 473.3(b), in that Respondent failed to comply with Citation Order No. 10737-L by failing to file the subject record of survey, as set forth above in paragraphs 7 through 9.

**SECOND CAUSE FOR DISCIPLINE**

**(Failure to Comply with the Board's Order)**

12. Respondent is subject to disciplinary action under California Code of Regulations, title 16, section 473.3(b), in that Respondent failed to comply with Citation Order No. 10826-L by failing to pay all of the assessed fine within the time allowed, as set forth above in paragraph 10.

**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 Land Surveyor License Number L 9013, issued to Kacie Allison Plouff;
- 2. Ordering Kacie Allison Plouff 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,
- 3. Taking such other and further action as deemed necessary and proper.

DATED: 6/16/20

*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*