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

In the Matter of the Accusation against:	)	
	)	
RODRIGO SANTOS	)	Case No. 1265-A
118 Chattanooga Street	)	
San Francisco, CA 94114	)	
	)	
Civil Engineer License, No. C 37153,	)	
Structural Engineer License, No. S 2984	)	
	)	
Respondent.	)	
	)	

DECISION

The attached Stipulated Surrender 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 30, 2023*.

IT IS SO ORDERED *July 27, 2023*.

Original Signed

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

ROB BONTA
Attorney General of California
DIANN SOKOLOFF
Supervising Deputy Attorney General
JULIANNE MOSSLER
Deputy Attorney General
State Bar No. 243749
1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-1349
Facsimile: (510) 622-2270
E-mail: Julianne.Mossler@doj.ca.gov
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**:** **RODRIGO SANTOS** **118 Chattanooga Street** **San Francisco, California 94114** **Civil Engineer License No. C 37153** **Structural Engineer License No. S 2984** Respondent.	Case No. 1265-A OAH No. 2023020473 **STIPULATED SURRENDER OF LICENSE 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 (Board). He brought this action solely in his official capacity and is represented in this matter by Rob Bonta, Attorney General of the State of California, by Julianne Mossler, Deputy Attorney General.

2. Rodrigo Santos (Respondent) is represented in this proceeding by attorney Randall G. Knox, whose address is: 870 Market Street, Ste. 820, San Francisco, CA 94102.

3. On or about July 22, 1983, the Board issued Civil Engineer License No. C 37153 to Respondent. The Civil Engineer License was in full force and effect at all times relevant to the charges brought in Accusation No. 1265-A and will expire on June 30, 2024, unless renewed.

4. On or about February 27, 1987, the Board issued Structural Engineer License No. S 2984 to Respondent. The Structural Engineer License was in full force and effect at all times relevant to the charges brought in Accusation No. 1265-A and will expire on June 30, 2024, unless renewed.

JURISDICTION

5. Accusation No. 1265-A was filed before the Board, and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on January 31, 2023. Respondent timely filed his Notice of Defense contesting the Accusation. A copy of Accusation No. 1265-A is attached as Exhibit A and incorporated by reference.

ADVISEMENT AND WAIVERS

6. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. 1265-A. Respondent also has carefully read, fully discussed with counsel, and understands the effects of this Stipulated Surrender of License and Order.

7. 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 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.

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

CULPABILITY

9. Respondent admits the truth of each and every charge and allegation in Accusation

No. 1265-A, agrees that cause exists for discipline and surrenders his Civil Engineer License No. C 37153 for the Board's formal acceptance.

10. Respondent admits the truth of each and every charge and allegation in Accusation No. 1265-A, agrees that cause exists for discipline and surrenders his Structural Engineer License No. S 2984 for the Board's formal acceptance.

11. Respondent understands that by signing this stipulation he enables the Board to issue an order accepting the surrender of his Civil Engineer License without further process.

12. Respondent understands that by signing this stipulation he enables the Board to issue an order accepting the surrender of his Structural Engineer License No. S 2984 without further process.

CONTINGENCY

13. This stipulation shall be subject to approval by the Board. Respondent understands and agrees that counsel for Complainant and the staff of the Board may communicate directly with the Board regarding this stipulation and surrender, 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 Surrender and Disciplinary 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.

14. The parties understand and agree that Portable Document Format (PDF) and facsimile copies of this Stipulated Surrender of License and Order, including PDF and facsimile signatures thereto, shall have the same force and effect as the originals.

15. This Stipulated Surrender of License 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 Surrender of License 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.

16. 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 37153, and Structural Engineer License No. S 2984 issued to Respondent Rodrigo Santos, are surrendered and accepted by the Board. The Decision becomes effective on September 30, 2023.

1. Respondent hereby freely and voluntarily surrenders his Civil Engineer License, No. C 37153 and Structural Engineer License, No. S 2984. This voluntary surrender shall be deemed a disciplinary action which shall become part of respondent's license history with the Board.

2. Respondent shall lose all rights and privileges as a civil engineer and a structural engineer in California as of the effective date of the decision of the Board adopting this stipulation, including the right to use any of the restricted titles associated with his licenses.

3. Respondent shall cause to be delivered to the Board the pocket identification card(s) and wall certificates for these licenses on or before the effective date of the decision of the Board adopting this stipulation.

4. Respondent agrees not to petition for reinstatement of the surrendered licenses. Respondent agrees not to apply for any license issued by the Board for three years from the effective date of this surrender. Respondent understands and agrees that if he ever applies for any license issued by the Board, the Board shall treat it as a new application for licensure. Respondent must comply with all the laws, regulations, and procedures for licensure in effect at the time the application is filed, including but not limited to submitting a completed application and the requisite fee and taking and passing the required examination(s), and all of the charges and allegations contained in the Accusation shall be deemed to be true, correct, and admitted by Respondent when the licensing agency determines whether to grant or deny the application.

ACCEPTANCE

I have carefully read the above Stipulated Surrender of License and Order and have fully discussed it with my attorney Randall G. Knox. I understand the stipulation and the effect it will

have on my Civil Engineer License and Structural Engineer License. I enter into this Stipulated Surrender of License 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: JULY 10, 2023

Original Signed
RODRIGO SANTOS
Respondent

I have read and fully discussed with Respondent Rodrigo Santos the terms and conditions and other matters contained in this Stipulated Surrender of License and Order. I approve its form and content.

DATED: 7/10/23

Original Signed
RANDALL G. KNOX
Attorney for Respondent

ENDORSEMENT

The foregoing Stipulated Surrender of License 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: 7/10/2023

Respectfully submitted,

ROB BONTA
Attorney General of California
DIANN SOKOLOFF
Supervising Deputy Attorney General

Original Signed

JULIANNE MOSSLER
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 1265-A

ROB BONTA
Attorney General of California
DIANN SOKOLOFF
Supervising Deputy Attorney General
JULIANNE MOSSLER
Deputy Attorney General
State Bar No. 243749
1515 Clay Street, 20th Floor
P.O. Box 70550
Oakland, CA 94612-0550
Telephone: (510) 879-1349
Facsimile: (510) 622-2270
E-mail: Julianne.Mossler@doj.ca.gov
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**:** **RODRIGO SANTOS** **118 Chattanooga Street** **San Francisco, California 94114** **Civil Engineer License No. C 37153** **Structural Engineer License No. S 2984** Respondent.	Case No. 1265-A **ACCUSATION**

PARTIES

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

2. On or about July 22, 1983, the Board issued Civil Engineer License Number C 37153 to Rodrigo Santos (Respondent). The Civil Engineer License was in full force and effect at all times relevant to the charges brought in this Accusation and will expire on June 30, 2024, unless renewed.

3. On or about February 27, 1987, the Board issued Structural Engineer License Number

S 2984 to Respondent. The Structural Engineer License was in full force and effect at all times relevant to the charges brought in this Accusation and will expire on June 30, 2024, unless renewed.

JURISDICTION

4. This Accusation is brought before the Board under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated. The California Professional Engineers Act is found at Code sections 6700 to 6799.

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

STATUTORY PROVISIONS

6. Section 490 of the Code provides, in pertinent part, that a board may suspend or revoke a license on the ground that the licensee has been convicted of a crime substantially related to the qualifications, functions, or duties of the business or profession for which the license was issued.

7. Section 493 of the Code states in relevant part:

> (a) Notwithstanding any other law, in a proceeding conducted by a board within the department pursuant to law to deny an application for a license or to suspend or revoke a license or otherwise take disciplinary action against a person who holds a license, upon the ground that the applicant or the licensee has been convicted of a crime substantially related to the qualifications, functions, and duties of the licensee in question, the record of conviction of the crime shall be conclusive evidence of the fact that the conviction occurred, but only of that fact.
>
> (b)(1) Criteria for determining whether a crime is substantially related to the qualifications, functions, or duties of the business or profession the board regulates shall include all of the following:
>
> (A) The nature and gravity of the offense.
>
> (B) The number of years elapsed since the date of the offense.
>
> (C) The nature and duties of the profession.
>
> (2) A board shall not categorically bar an applicant based solely on the type of conviction without considering evidence of rehabilitation.

(c) As used in this section, "license" includes "certificate," "permit," "authority," and "registration."

. . .

8. Section 6775 of the Code states in relevant part:

[T]he board may publicly reprove, suspend for a period not to exceed two years, or revoke the certificate of any professional engineer licensed under this chapter on any of the following grounds:

(a) Any conviction of a crime substantially related to the qualifications, functions, and duties of a licensed professional engineer, in which case the certified record of conviction shall be conclusive evidence thereof.

(b) Any deceit, misrepresentation, or fraud in his or her practice.

. . .

(g) A violation in the course of the practice of professional engineering of a rule or regulation of unprofessional conduct adopted by the board.

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

REGULATORY PROVISIONS

9. Section 404 of the Title 16, California Code of Regulations states:

For the purpose of the rules and regulations contained in this chapter, the following terms are defined. No definition contained herein authorizes the practice of engineering as defined in the Professional Engineers Act.

. . .

(k) "Civil engineer" refers to a person who holds a valid license in the branch of civil engineering, as defined in Section 6702 of the Code.

(l) "Civil engineering" is that branch of professional engineering as defined in Section 6731 of the Code.

. . .

(ii) "Professional engineer" refers to a person engaged in the practice of professional engineering as defined in Section 6701 of the Code.

(jj) "Professional engineering" within the meaning of this chapter comprises the following branches: agricultural engineering, chemical engineering, civil engineering, control system engineering, corrosion engineering, electrical engineering, fire protection engineering, industrial engineering, manufacturing engineering, mechanical engineering, metallurgical engineering, nuclear engineering, petroleum engineering, quality engineering, safety engineering, and traffic engineering.

. . .

(oo) "structural engineer" refers to a civil engineer who holds a valid authorization to use the title 'structural engineer," as provided in Section 6736 of the Code.

(pp) "structural engineering" for the purposes of structural authority is the application of specialized civil engineering knowledge and experience to the design and analysis of buildings (or other structures) which are constructed or rehabilitated to resist forces induced by vertical and horizontal loads of a static and dynamic nature. This specialized knowledge includes familiarity with scientific and mathematical principles, experimental research data and practical construction methods and processes. The design and analysis shall include consideration of stability, deflection, stiffness and other structural phenomena that affect the behavior of the building (or other structure).

. . .

10. Section 416 of the Title 16, California Code of Regulations states in relevant part:

(a) For the purpose of denial, suspension, or revocation of the certification of an engineer-in-training or a land surveyor-in-training or license of a professional engineer or a land surveyor pursuant to Section 141, Division 1.5 (commencing with Section 475), subdivision (a) of Section 6775, subdivision (a) of Section 6775.1, Section 6779, subdivision (e) of Section 8780, subdivision (a) of Section 8780.1, or Section 8783 of the Business and Professions Code, a crime, professional misconduct, or act shall be considered substantially related to the qualifications, functions, and duties of a professional engineer or land surveyor if, to a substantial degree, it evidences present or potential unfitness of a professional engineer or land surveyor to perform the functions authorized by the license in a manner consistent with the public health, safety, or welfare.

(b) In making the substantial relationship determination required under subdivision (a) for a crime, the Board shall consider all of the following criteria:

(1) The nature and gravity of the offense.

(2) The number of years elapsed since the date of the offense.

(3) The nature and duties of a professional engineer or land surveyor.

(c) For purposes of subdivision (a), substantially related crimes, professional misconduct, or acts shall include, but are not limited to, the following:

(1) For engineers-in-training and professional engineers, any violations of the provisions of the Professional Engineers Act or other state or federal laws governing the practice of professional engineering or aiding and abetting any person in such a violation;

. . .

(3) A conviction of a crime arising from or in connection with the practice of professional engineering or land surveying.

11. Section 475 of the Title 16, California Code of Regulations, states in relevant part:

To protect and safeguard the health, safety, welfare, and property of the public, every

person who is licensed by the Board as a professional engineer, including licensees employed in any manner by a governmental entity or in private practice, shall comply with this Code of Professional Conduct. A violation of this Code of Professional Conduct in the practice of professional engineering constitutes unprofessional conduct and is grounds for disciplinary action pursuant to Section 6775 of the Code. This Code of Professional Conduct shall be used for the sole purpose of investigating complaints and making findings thereon under Section 6775 of the Code.

(a) Compliance with Laws Applicable to a Project:

A licensee shall provide professional services for a project in a manner that is consistent with the laws, codes, ordinances, rules, and regulations applicable to that project. A licensee may obtain and rely upon the advice of other professionals (e.g., architects, attorneys, professional engineers, professional land surveyors, and other qualified persons) as to the intent and meaning of such laws, codes, and regulations.

. . .

COST RECOVERY

12. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licensee 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, with failure of the licensee to comply subjecting the license to not being renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be included in a stipulated settlement.

FACTUAL ALLEGATIONS

13. On January 13, 2023, in *United States of America v. Rodrigo Santos*, United States District Court, Northern District of California Indictment numbers CR 21-268-SI, CR 21-453-SI and CR 22-345-SI, Respondent entered pleas of guilty to:

- Counts 1 through 10 of Indictment CR 21-268-SI charging Bank Fraud in violation of 18 U.S.C. § 1344(2);
- Count 11 of Indictment CR 21-268-SI charging Falsification of Records in a Federal Investigation in violation of 18 U.S.C. § 1519;
- Counts 1 through 5 of Information CR 345-SI charging Tax Evasion in violation of U.S.C. § 7201; and
- Count 2 of Indictment CR 21-453-SI charging Honest Services Wire Fraud in violation of 18 U.S.C. §§ 1343 and 1346.

14. As part of his plea agreement in connection with the charge of Bank Fraud (Counts 1 through 10 of Indictment CR 21-268-SI), Respondent admitted that:

- Starting no later than November 2012 and continuing through March 2019, Respondent devised a scheme to fraudulently obtain money from clients. As part of the scheme, Respondent requested, or caused an employee of his firm to request, numerous checks from clients made payable to the San Francisco Department of Building Inspection (DBI), the Department of Public Works (DPW), other municipal agencies, private companies, or individuals. Respondent led his clients to believe that the checks they wrote would be used to pay fees or other costs associated with their building and construction projects, but in truth, Respondent intended to deposit the checks into his personal bank account.

- In many instances, once Respondent obtained the checks from his clients, he fraudulently altered the checks by editing the "pay to the order of" field to make the checks appear as if they were written to him personally. In other instances, Respondent fraudulently endorsed checks to himself by signing the back of the check on behalf of the payee without authorization from the payee or from the client who wrote the check.

- Respondent deposited the altered and fraudulently endorsed client checks into his personal account, causing funds from clients' banks to be transferred into his account.

- Between approximately November 2012 and March 2019, Respondent deposited approximately 445 fraudulently obtained checks amounting to approximately $775,412.90 into his personal account.

- Respondent also admitted devising and executing a related scheme starting no later than November 2012 and continuing through October 2018 where he requested, or caused an employee of his firm to request, checks from clients payable to his firm in connection with work he completed for those clients on behalf of the firm.

- After receiving checks payable to firm, Respondent deposited those checks into his personal bank account without informing the firm or his business partner, and without permission from the firm, his business partner, or the clients. Checks payable to the firm should have been deposited into the firm's business bank account, but instead, Respondent fraudulently endorsed each check by signing his name on the back for deposit into his personal account. Respondent agreed that his fraudulent endorsement on the back of each check amounted to a misrepresentation that he had the authority to deposit checks payable to the firm into his personal bank account. In fact, Respondent did not have authority to do so, and agreed that his fraudulent misrepresentations caused funds from clients' banks to be transferred into his personal account.

- Between approximately November of 2012 and November 2018, Respondent admitted diverting approximately 378 checks into his personal account, causing a loss to his firm of $719,883.34.

- Respondent admitted that the total fraud loss amount is $1,495,296.24.

15. As part of his plea agreement in connection with the charge of Falsification of Records in a Federal Investigation (Count 11 of Indictment CR 21-268-SI), Respondent admitted that:

- On March 2, 2020, Respondent received a grand jury subpoena requesting documents related to six specific client checks connected to the fraud scheme. In response to the subpoena, Respondent prepared falsified invoices to make it appear that clients received credit for checks that Respondent deposited into his personal bank account

as part of the fraud scheme. Respondent admitted that he knew that he did not credit the clients for the value of those checks.

- Respondent admitted that he altered and falsified the invoices intending to obstruct, impeded, and influence the active FBI investigation into his conduct.

- Respondent gave the altered invoices to his attorney to provide in response to the subpoena. Respondent never informed his attorney that the invoices were falsified, and admits that his attorney forwarded the falsified invoices to the government on March 27, 23 2020.

16. As part of his plea agreement in connection with the charge of Tax Evasion (Counts 1 through 5 of Indictment CR 345-SI), Respondent admitted that:

- Between November 2012 and March 2019, Respondent deposited 823 checks totaling approximately $1,675,267.08. Respondent admitted that he willfully evaded taxes owed on income by deliberately omitting the income from the fraud scheme on each of his U.S. Individual Income Tax Returns (Form 1040) from tax years 2012 through 2019.

- Respondent admitted that he willfully caused to be prepared, signed, and submitted to the Internal Revenue Service a false and fraudulent Form 1040 in each tax year starting in 2012 through and including 2019. Respondent admitted that the total unreported income was $1,675,267.08, resulting in total tax avoidance of $564,424.00.

17. As part of his plea agreement in connection with the charge of Honest Services Wire Fraud (Count 2 of Indictment CR 21-453-SI), Respondent admitted that:

- Beginning no later than May of 2017 and continuing until at least April of 2020, Respondent admitted that he devised and executed a scheme to defraud the public of the honest services of a Senior Building Inspector at San Francisco Department of Building Inspection (DBI). Respondent knew that the inspector supported and participated in activities at the San Francisco Golden Gate Rugby Association (SFGGR). As part of the scheme, Respondent asked his clients to make charitable contributions to SFGGR, intending that those donations would influence the inspector in the performance of his official duties. After soliciting SFGGR donations from his clients, Respondent ensured that the inspector knew about the donations by either personally delivering his clients' checks to the inspector or otherwise informing the inspector of the donation.

- In exchange for the stream of donations flowing to SFGGR from Respondent's clients, the inspector gave Respondent's clients favorable official treatment in his capacity as a senior DBI inspector.

- As part of the scheme, Respondent caused 13 clients to write checks to SFGGR, with one client writing two checks. SFGGR donations from Respondent's clients totaled $9,600 from May 2017 through April 2019.

- The inspector took at least one official action, including performing inspections and/or issuing a Certificate of Final Completion, for all 13 of Respondent's donor-clients.

- Respondent admitted that neither he nor the inspector ever disclosed the donations to DBI management, and that their concealment of the scheme allowed it to continue because, if DBI had known about the SFGGR donations from Respondent's clients, the inspector would not have been permitted to inspect properties associated with Respondent or his firm.

FIRST CAUSE FOR DISCIPLINE
(Conviction of Substantially Related Crime)

18. Respondent is subject to disciplinary action under Code sections 490, 493, and 6775, subdivision (a), in conjunction with California Code of Regulations, title 16, section 416, in that he was convicted of a crime substantially related to the qualifications, functions, and duties of a licensed professional engineer as more fully set forth in paragraphs 13 through 17, above.

SECOND CAUSE FOR DISCIPLINE
(Misrepresentation, Fraud, or Deceit in Practice)

19. Respondent is subject to disciplinary action under Code sections 6775, subdivision (b) in that Respondent engaged in deceit, misrepresentation, or fraud as more fully set forth in paragraphs 13 through 17, above.

THIRD CAUSE FOR DISCIPLINE
(Unprofessional Conduct – Violation of Board Statutes, Regulations, and/or Professional Standards)

20. Respondent is subject to disciplinary action under Code section 6775, subdivisions (g) and (h), in conjunction with California Code of Regulations, title 16, section 475, subdivision (a), in that he engaged in unprofessional conduct as more fully set for the in paragraphs 13 through 17, above.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters alleged in this Accusation, 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 37153, issued to Rodrigo Santos;

2. Revoking or suspending Structural Engineer License Number S 2984, issued to Rodrigo Santos;

3. Ordering Rodrigo Santos 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: 1/30/2023

Original Signed

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

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