

**BEFORE THE
CALIFORNIA ARCHITECTS BOARD
LANDSCAPE ARCHITECTS TECHNICAL COMMITTEE
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. LA 2016-19

**ROBERT DEAN
2419 Erie Street
San Diego, CA 92110**

Landscape Architect License No. LA 2322

Respondent.

DECISION AND ORDER

The attached Stipulated Surrender of License and Order is hereby adopted by the California Architects Board, Landscape Architects Technical Committee, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on July 17, 2018.

It is so ORDERED June 13, 2018



FOR THE CALIFORNIA ARCHITECTS BOARD
LANDSCAPE ARCHITECTS TECHNICAL COMMITTEE
DEPARTMENT OF CONSUMER AFFAIRS

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10 **BEFORE THE**
CALIFORNIA ARCHITECTS BOARD
11 **LANDSCAPE ARCHITECTS TECHNICAL COMMITTEE**
DEPARTMENT OF CONSUMER AFFAIRS
12 **STATE OF CALIFORNIA**

13 In the Matter of the Accusation Against:

Case No. LA 2016-19

14 **ROBERT DEAN**
2419 Erie Street
15 **San Diego, CA 92110**

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

16 **Landscape Architect License No. LA 2322**

17 Respondent.

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

21 PARTIES

22 1. Vickie Mayer (Complainant) is the Interim Executive Officer of the Landscape
23 Architects Technical Committee of the California Architects Board (Board) and is represented in
24 this matter by Xavier Becerra, Attorney General of the State of California, by Alan Macina,
25 Deputy Attorney General. This action was brought by Douglas R. McCauley, former Executive
26 Officer of the Board's Landscape Architects Technical Committee, and solely in his official
27 capacity.

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1 CULPABILITY

2 8. Respondent admits the truth of each and every charge and allegation in Accusation
3 No. LA 2016-19, agrees that cause exists for discipline, and hereby surrenders his Landscape
4 Architect License No. LA 2322 for the Board's formal acceptance.

5 9. Respondent understands that by signing this stipulation he enables the Board to issue
6 an order accepting the surrender of his Landscape Architect License without further process.

7 CONTINGENCY

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

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

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

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

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1 ORDER

2 IT IS HEREBY ORDERED that Landscape Architect License No. LA 2322, issued to
3 Respondent Robert Dean, is surrendered and accepted by the California Architects Board.

4 1. The surrender of Respondent's Landscape Architect License and the acceptance of
5 the surrendered license by the Board shall constitute the imposition of discipline against
6 Respondent. This stipulation constitutes a record of the discipline and shall become a part of
7 Respondent's license history with the Landscape Architects Technical Committee.

8 2. Respondent shall lose all rights and privileges as a landscape architect in California as
9 of the effective date of the Board's Decision and Order.

10 3. Respondent shall cause to be delivered to the Board his pocket license and, if one was
11 issued, his wall certificate on or before the effective date of the Decision and Order.

12 4. If Respondent ever files an application for licensure or a petition for reinstatement in
13 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must
14 comply with all the laws, regulations and procedures for reinstatement of a revoked or
15 surrendered license in effect at the time the petition is filed, and all of the charges and allegations
16 contained in Accusation No. LA 2016-19 shall be deemed to be true, correct and admitted by
17 Respondent when the Board determines whether to grant or deny the petition.

18 5. Respondent shall pay the agency its costs of investigation and enforcement in the
19 amount of \$2,240.00 prior to issuance of a new or reinstated license.

20 ACCEPTANCE


21 I have carefully read the above Stipulated Surrender of License and Order and have fully
22 discussed it with my attorney, Thomas J. Warwick, Jr. I understand the stipulation and the effect
23 it will have on my Landscape Architect License. I enter into this Stipulated Surrender of License
24 and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and
25 Order of the California Architects Board, Landscape Architects Technical Committee.

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27 DATED: MARCH 7, 2018

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ROBERT DEAN
Respondent

1 I have read and fully discussed with Respondent Robert Dean the terms and conditions and
2 other matters contained in this Stipulated Surrender of License and Order. I approve its form and
3 content.

4 DATED: 12 March 2018



THOMAS J. WARWICK, JR.
Attorney for Respondent

6 ENDORSEMENT

7 The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted
8 for consideration by the California Architects Board, Landscape Architects Technical Committee
9 of the Department of Consumer Affairs.

10
11 Dated: March 13, 2018

Respectfully submitted,
XAVIER BECERRA
Attorney General of California
HARINDER K. KAPUR
Supervising Deputy Attorney General


ALAN MACINA
Deputy Attorney General
Attorneys for Complainant

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