

BEFORE THE
CALIFORNIA ARCHITECTS BOARD
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

Case No. 14-02-036

JEFFREY WALTER RICHARDSON
2045 Plymouth Street
Mountain View, CA 94043

Architect License No. C-29033

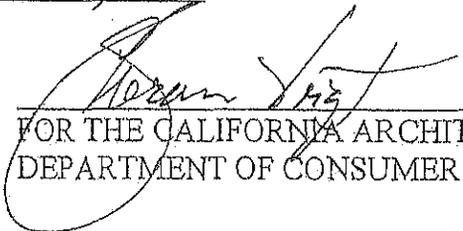
Respondent.

DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the California Architects Board, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on January 21, 2015.

It is so ORDERED December 22, 2014.



FOR THE CALIFORNIA ARCHITECTS BOARD
DEPARTMENT OF CONSUMER AFFAIRS

1 KAMALA D. HARRIS
Attorney General of California
2 FRANK H. PACOE
Supervising Deputy Attorney General
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8 **BEFORE THE**
CALIFORNIA ARCHITECTS BOARD
DEPARTMENT OF CONSUMER AFFAIRS
9 **STATE OF CALIFORNIA**

10 In the Matter of the Accusation Against:

Case No. 14-02-036

11 **JEFFREY WALTER RICHARDSON**
12 **2045 Plymouth Street**
13 **Mountain View, CA 94043**

STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER

14 **Architect License No. C-29033**

15 Respondent.

16
17 In the interest of a prompt and speedy settlement of this matter, consistent with the public
18 interest and responsibility of the California Architects Board ("Board"), Department of Consumer
19 Affairs, the parties hereby agree to the following Stipulated Settlement and Disciplinary Order to
20 be submitted to the Board for approval and adoption as the final disposition of the Accusation.

21
22 PARTIES

23 1. Douglas R. McCauley ("Complainant") is the Executive Officer of the Board. He
24 brought this action solely in his official capacity and is represented in this matter by Kamala D.
25 Harris, Attorney General of the State of California, by Joshua A. Room, Supervising Deputy
26 Attorney General.

27 2. Respondent Jeffrey Walter Richardson ("Respondent") is representing himself in this
28 proceeding and has chosen not to exercise his right to be represented by counsel.

1 CULPABILITY

2 8. Respondent admits the truth of each and every charge and allegation in Accusation
3 No. 14-02-036. Respondent agrees that his Architect License is subject to discipline and he
4 agrees to be bound by the Board's probationary terms as set forth in the Disciplinary Order below.
5

6 CIRCUMSTANCES IN MITIGATION

7 9. Respondent has never been the subject of any prior disciplinary action before the
8 Board. He is admitting responsibility at an early stage in the proceedings.
9

10 RESERVATION

11 10. Admissions made by Respondent herein are only for the purposes of this proceeding,
12 or any other proceedings in which the Board or other professional licensing agency is involved,
13 and shall not be admissible in any other criminal or civil proceeding.
14

15 CONTINGENCY

16 11. This stipulation shall be subject to approval by the California Architects Board.
17 Respondent understands and agrees that counsel for Complainant and the staff of the Board may
18 communicate directly with the Board regarding this stipulation and settlement, without notice to
19 or participation by Respondent. By signing the stipulation, Respondent understands and agrees
20 that he may not withdraw his agreement or seek to rescind the stipulation prior to the time the
21 Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and
22 Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for
23 this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall
24 not be disqualified from further action by having considered this matter.

25 12. The parties understand and agree that Portable Document Format (PDF) and facsimile
26 copies of this Stipulated Settlement and Disciplinary Order, including PDF and facsimile
27 signatures thereto, shall have the same force and effect as the originals.
28

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1 5. **Obey All Laws.** Respondent shall obey all federal, state and local laws and
2 regulations governing the practice of architecture in California.

3 6. **Submit Quarterly Reports.** Respondent, within ten (10) days of completion of the
4 quarter, shall submit quarterly written reports to the Board on a Quarterly Report of Compliance
5 form (10/98) obtained from the Board.

6 7. **Correspondence By Sponsor.** Respondent shall ensure that at least once every
7 calendar year, or more often if specified by the Board or its designee, Respondent's sponsor or
8 other person familiar with his efforts at substance abuse treatment and/or recovery shall report in
9 writing to the Board regarding Respondent's status and progress in treatment/recovery. This
10 written report shall provide contact information for the author, and the Board or its designee may
11 contact the author to ask additional questions and follow-up. Respondent shall be responsible to
12 ensure such reports are timely provided and that such follow-up contact is possible.

13 8. **Personal Appearances.** Upon reasonable notice by the Board, the Respondent shall
14 report to and make personal appearances at times and locations as the Board may direct.

15 9. **Cooperate During Probation.** Respondent shall cooperate fully with the Board, and
16 with any of its agents or employees in their supervision and investigation of his compliance with
17 the terms and conditions of this probation. Upon reasonable notice, the Respondent shall provide
18 the Board, its agents or employees with the opportunity to review all plans, specifications, and
19 instruments of service prepared during the period of probation.

20 10. **Tolling for Out-of-State Practice, Residence or In-State Non-Practice.** In the
21 event Respondent should leave California to reside or to practice outside the State or for any
22 reason stop practicing architecture in California, Respondent shall notify the Board or its designee
23 in writing within ten (10) days of the dates of departure and return, or the dates of non-practice or
24 the resumption of practice within California. Non-practice is defined as any period of time
25 exceeding thirty (30) days in which Respondent is not engaging in any activities defined in
26 Section 5500.1 of the Business and Professions Code. All provisions of probation other than the
27 quarterly report requirements, examination requirements, and education requirements, shall be
28 held in abeyance until Respondent resumes practice in California.

1 All provisions of probation shall recommence on the effective date of resumption of
2 practice in California. Periods of temporary or permanent residency or practice outside California
3 or of non-practice within California will not apply to the reduction of this probationary period.

4 11. **Violation of Probation.** If Respondent violates probation in any respect, the Board,
5 after giving Respondent notice and opportunity to be heard, may revoke probation and carry out
6 the disciplinary order which was stayed. If an accusation or a petition to revoke probation is filed
7 against Respondent during probation, the Board shall have continuing jurisdiction until the matter
8 is final, and the period of probation shall be extended until the matter is final.

9 12. **Completion of Probation.** Upon successful completion of probation, Respondent's
10 license will be fully restored.

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12
13 ACCEPTANCE

14 I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the
15 stipulation and the effect it will have on my Architect License. I enter into this Stipulated
16 Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be
17 bound by the Decision and Order of the Board.

18
19 DATED: _____

11/10/14



JEFFREY WALTER RICHARDSON
Respondent

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ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Board.

Dated: 11/14/2014

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
FRANK H. PACOE
Supervising Deputy Attorney General


JOSHUA A. ROOM
Supervising Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 14-02-036

1 KAMALA D. HARRIS
Attorney General of California
2 FRANK H. PACOE
Supervising Deputy Attorney General
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CALIFORNIA ARCHITECTS BOARD
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the Accusation Against:

Case No. 14-02-036

11 **JEFFREY WALTER RICHARDSON**
12 **2963 Emerson Street**
13 **Palo Alto, CA 94306**

A C C U S A T I O N

14 **Architect License No. C-29033**

15 Respondent.

16
17 Complainant alleges:

18 PARTIES

- 19 1. Douglas R. McCauley (Complainant) brings this Accusation solely in his official
20 capacity as Executive Officer, California Architects Board, Department of Consumer Affairs.
21 2. On or about July 8, 2002, the California Architects Board issued Architect License
22 Number C-29033 to Jeffrey Walter Richardson (Respondent). The License was in full force and
23 effect at all times relevant to the charges herein and will expire on July 31, 2015, unless renewed.
24

25 JURISDICTION

- 26 3. This Accusation is brought before the California Architects Board (Board),
27 Department of Consumer Affairs, under the authority of the following laws. All section
28 references are to the Business and Professions Code (Code) unless otherwise indicated.

1 COST RECOVERY

2 8. Section 125.3, subdivision (a), states, in pertinent part: "Except as otherwise provided
3 by law, in any order issued in resolution of a disciplinary proceeding before any board within the
4 department . . . upon request of the entity bringing the proceedings the administrative law judge
5 may direct a licentiate found to have committed a violation or violations of the licensing act to
6 pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case."
7

8 FIRST CAUSE FOR DISCIPLINE

9 (Conviction of Substantially Related Crime(s))

10 9. Respondent is subject to disciplinary action under section 5577 of the Code, for
11 conviction of a substantially related crime, in that on or about October 4, 2011, in a criminal case
12 titled *People v. Jeffrey Walter Richardson*, Case No. B1155412 in Santa Clara County Superior
13 Court, Respondent was convicted of violating Vehicle Code section 23153, subdivision (b)
14 (Driving With a Blood Alcohol of 0.08% or More and Causing Injury), a misdemeanor, and Penal
15 Code section 273a, subdivision (a) (Causing or Permitting a Child to Suffer or Inflicting Pain or
16 Suffering on a Child), a felony. The conviction was entered as follows:

17 10. On or about August 4, 2011, based on an incident that took place on or about July 22,
18 2011, Respondent was charged in Case No. B1155412 with violating (1) Vehicle Code section
19 23153, subdivision (a) (Driving Under the Influence of Alcohol and Drugs and Causing Injury), a
20 felony, (2) Vehicle Code section 23153, subdivision (b) (Driving With a Blood Alcohol of 0.08%
21 or More and Causing Injury), a felony, and (3) Penal Code section 273a, subdivision (a) (Causing
22 or Permitting a Child to Suffer or Inflicting Pain or Suffering on a Child), a felony.

23 11. On or about October 4, 2011, Respondent entered into a plea agreement whereby (1)
24 count 1 was dismissed, (2) count 2 was reduced to a misdemeanor, and (3) Respondent pleaded
25 nolo contendere to amended count 2, and count 3. On or about November 10, 2011, imposition of
26 sentence was suspended and Respondent was placed on probation for four (4) years, on terms and
27 conditions including 50 days in county jail (with 4 days credited), completion of a (3 month) First
28 Offender Program, completion of a substance abuse/counseling program, and fines and fees.

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PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the California Architects Board issue a decision:

1. Revoking or suspending Architect License Number C-29033, issued to Jeffrey Walter Richardson (Respondent);
2. Ordering Respondent to pay the Board 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 is deemed necessary and proper.

DATED: August 11, 2014

Douglas R. McCauley
DOUGLAS R. MCCAULEY
Executive Officer
California Architects Board
Department of Consumer Affairs
State of California
Complainant

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