

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

In the Matter of the Petition to Revoke
Probation Against:

Case No. D1-2013-9

KERI MARIE CHISOLM
1741 Tustin Avenue, Apt. 20A
Costa Mesa, CA 92627

Certified Public Accountant
Certificate No. CPA 118994

Respondent.

DECISION AND ORDER

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

This Decision shall become effective on Feb. 27, 2016.

It is so ORDERED Jan. 28, 2016.



FOR THE CALIFORNIA BOARD OF
ACCOUNTANCY
DEPARTMENT OF CONSUMER AFFAIRS

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9 **BEFORE THE**
CALIFORNIA BOARD OF ACCOUNTANCY
DEPARTMENT OF CONSUMER AFFAIRS
10 **STATE OF CALIFORNIA**

11 In the Matter of the Petition to Revoke
12 Probation Against:

Case No. D1-2013-9

13 **KERI MARIE CHISOLM**
1741 Tustin Avenue, Apt. 20A
14 Costa Mesa, CA 92627

**STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER**

15 **Certified Public Accountant Certificate No.**
16 **CPA 118994**

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. Patti Bowers ("Complainant") is the Executive Officer of the California Board of
23 Accountancy. She brought this action solely in her official capacity and is represented in this
24 matter by Kamala D. Harris, Attorney General of the State of California, by Carl W. Sonne,
25 Deputy Attorney General.

26 2. Respondent Keri Marie Chisolm ("Respondent") is representing herself in this
27 proceeding and has chosen not to exercise her right to be represented by counsel.
28

1 CULPABILITY

2 9. Respondent admits the truth of each and every charge and allegation in Petition to
3 Revoke Probation No. D1-2013-9, except that Respondent alleges her quarterly reports were
4 materially timely submitted.

5 10. Respondent agrees that her Certified Public Accountant Certificate is subject to
6 discipline and she agrees to be bound by the CBA's probationary terms as set forth in the
7 Disciplinary Order below.

8 RESERVATION

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

13 CONTINGENCY

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

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

27 14. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an
28 integrated writing representing the complete, final, and exclusive embodiment of their agreement.

1 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
2 negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary
3 Order may not be altered, amended, modified, supplemented, or otherwise changed except by a
4 writing executed by an authorized representative of each of the parties.

5 15. In consideration of the foregoing admissions and stipulations, the parties agree that
6 the CBA may, without further notice or formal proceeding, issue and enter the following
7 Disciplinary Order:

8 **DISCIPLINARY ORDER**

9 IT IS HEREBY ORDERED that Certified Public Accountant Certificate No. CPA 118994
10 issued to Respondent Keri Marie Chisolm is revoked, in accordance with the CBA's 2013 Order.
11 However, the revocation previously stayed pursuant to the CBA's 2013 Order shall remain stayed
12 and Respondent shall remain on probation for an additional year, until April 28, 2019, on the
13 following terms of probation, which shall supersede those in the CBA's 2013 Order:

14 1. **Obey All Laws**

15 Respondent shall obey all federal, California, other states' and local laws, including those
16 rules relating to the practice of public accountancy in California.

17 2. **Submit Written Reports**

18 Respondent shall submit, within 10 days of completion of the quarter, written reports to the
19 CBA on a form obtained from the CBA. The respondent shall submit, under penalty of perjury,
20 such other written reports, declarations, and verification of actions as are required. These
21 declarations shall contain statements relative to respondent's compliance with all the terms and
22 conditions of probation. Respondent shall immediately execute all release of information forms
23 as may be required by the CBA or its representatives.

24 3. **Personal Appearances**

25 Respondent shall, during the period of probation, appear in person at interviews/meetings as
26 directed by the CBA or its designated representatives, provided such notification is accomplished
27 in a timely manner.

28

1 **4. Comply With Probation**

2 Respondent shall fully comply with the terms and conditions of the probation imposed by
3 the CBA and shall cooperate fully with representatives of the California Board of Accountancy in
4 its monitoring and investigation of the respondent's compliance with probation terms and
5 conditions.

6 **5. Practice Investigation**

7 Respondent shall be subject to, and shall permit, a practice investigation of the respondent's
8 professional practice. Such a practice investigation shall be conducted by representatives of the
9 CBA, provided notification of such review is accomplished in a timely manner.

10 **6. Comply With Citations**

11 Respondent shall comply with all final orders resulting from citations issued by the
12 California Board of Accountancy.

13 **7. Tolling of Probation for Out-of-State Residence/Practice**

14 In the event respondent should leave California to reside or practice outside this state,
15 respondent must notify the CBA in writing of the dates of departure and return. Periods of non-
16 California residency or practice outside the state shall not apply to reduction of the probationary
17 period, or of any suspension. No obligation imposed herein, including requirements to file
18 written reports, reimburse the CBA costs, and make restitution to consumers, shall be suspended
19 or otherwise affected by such periods of out-of-state residency or practice except at the written
20 direction of the CBA.

21 **8. Violation of Probation**

22 If respondent violates probation in any respect, the CBA, after giving respondent notice and
23 an opportunity to be heard, may revoke probation and carry out the disciplinary order that was
24 stayed. If an accusation or a petition to revoke probation is filed against respondent during
25 probation, the CBA shall have continuing jurisdiction until the matter is final, and the period of
26 probation shall be extended until the matter is final.

27 The CBA's Executive Officer may issue a citation under California Code of Regulations,
28 Section 95, to a licensee for a violation of a term or condition contained in a decision placing that

1 licensee on probation.

2 **9. Completion of Probation**

3 Upon successful completion of probation, respondent's license will be fully restored.

4 **10. Rehabilitation Program/Chemical Dependence**

5 Respondent shall successfully complete or shall have successfully completed a
6 rehabilitation program for chemical dependence that the CBA or its designee approves and shall
7 have reports submitted by the program. If a program was not successfully completed prior to the
8 period of probation, the respondent, within a reasonable period of time as determined by the CBA
9 or its designee but not exceeding 90 days of the effective date of the decision, shall be enrolled in
10 a program. In addition, respondent must attend support groups, (e.g. Narcotics Anonymous,
11 Alcoholic Anonymous etc.), as directed by the CBA or its designee. Respondent is responsible
12 for all costs of such a program.

13 **11. Drugs - Abstain From Use**

14 Respondent shall completely abstain from the personal use of all psychotropic drugs,
15 including alcohol, in any form except when the same are lawfully prescribed.

16 **12. Biological Fluid Testing**

17 Respondent, at any time during the period of probation, shall fully cooperate with the CBA
18 or its designee in its supervision and investigation of compliance with the terms and conditions of
19 probation, and shall, when requested, submit to such tests and samples as the CBA or its designee
20 may require for the detection of alcohol, narcotics, hypnotic, dangerous drugs, or controlled
21 substances. Respondent is responsible for all costs associated with this investigation and testing.

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23 **ACCEPTANCE**

24 I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the
25 stipulation and the effect it will have on my Certified Public Accountant Certificate. I enter into

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this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the California Board of Accountancy.

DATED: 1/7/2016


KERI MARIE CHISOLM
Respondent

ENDORSEMENT

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

Dated: 1/11/2016

Respectfully submitted,
KAMALA D. HARRIS
Attorney General of California
JAMES M. LEDAKIS
Supervising Deputy Attorney General


CARL W. SONNE
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Petition to Revoke Probation No. D1-2013-9

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9 **BEFORE THE**
CALIFORNIA BOARD OF ACCOUNTANCY
DEPARTMENT OF CONSUMER AFFAIRS
10 **STATE OF CALIFORNIA**

11 In the Matter of the Petition to Revoke
12 Probation Against,

Case No. D1-2013-9

13 **KERI MARIE CHISOLM**
14 **123 9th Street, Apt. 2**
Huntington Beach, CA 92648

PETITION TO REVOKE PROBATION

15 **Certified Public Accountant**
16 **License No. 118994**

17 Respondent.

18
19 Complainant alleges:

20 **PARTIES**

21 1. Patti Bowers (Complainant) brings this Petition to Revoke Probation solely in her
22 official capacity as the Executive Officer of the California Board of Accountancy, Department of
23 Consumer Affairs.

24 2. On or about May 14, 2013, the California Board of Accountancy issued Certified
25 Public Accountant License Number 118994 to Keri Marie Chisolm (Respondent). The Certified
26 Public Accountant License was in effect at all times relevant to the charges brought herein and
27 will expire on July 31, 2016, unless renewed.
28

1 are as follows: Respondent's quarterly report, due April 10, 2015, was not received until April
2 18, 2015, and the report due January 10, 2015, was not received until January 12, 2015.

3 **THIRD CAUSE TO REVOKE PROBATION**

4 **(Failure to Comply with Probation)**

5 10. At all times after the effective date of Respondent's probation, Condition 4 stated:

6 **Comply With Probation**

7 Respondent shall fully comply with the terms and conditions of the probation
8 imposed by the CBA and shall cooperate fully with representatives of the California
9 Board of Accountancy in its monitoring and investigation of the respondent's compliance
10 with probation terms and conditions.

11 11. Respondent's probation is subject to revocation because she failed to comply with
12 Probation Condition 4, referenced above, by failing cooperate with the CBA and its
13 representatives, including Phamatech, in complying with the terms of probation as set forth above
14 regarding biological fluid testing and timely submission of quarterly reports.

15 **PRAYER**

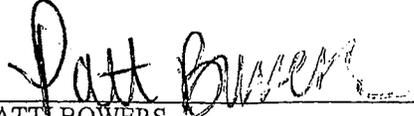
16 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
17 and that following the hearing, the California Board of Accountancy issue a decision:

18 1. Revoking the probation that was granted by the California Board of Accountancy in
19 Case No. SI-2013-9 and imposing the disciplinary order that was stayed thereby revoking
20 Certified Public Accountant License No. 118994 issued to Keri Marie Chisolm;

21 2. Revoking or suspending Certified Public Accountant License No. 118994, issued to
22 Keri Marie Chisolm; and

23 3. Taking such other and further action as deemed necessary and proper.

24
25 DATED: 12/7/2015


26 PATTI BOWERS
27 Executive Officer
28 California Board of Accountancy
Department of Consumer Affairs
State of California
Complainant