

**From:** Taiga.Takahashi@lw.com  
**Sent:** Wednesday, January 23, 2019 12:00 PM  
**To:** Dias, Matt@BOF  
**Cc:** Public Comments@BOF  
**Subject:** Rancho Guejito public comment during 1/23 hearing

For your information – this is the public comment submitted during the hearing on this item on the webinar, on behalf of Rancho Guejito. The staffperson on the webinar suggested I email you a copy.

“Unfortunately, Rancho Guejito cannot support the proposed CRM regulations. The proposed regulations do not address the ranch's concerns regarding the enforcement of good moral character requirements and actually lessen protection for the public by eliminating the existing requirement to adhere to professional standards. Rancho Guejito disagrees with the idea that a licensed CRM is not required to demonstrate good moral character. CRMs should have to demonstrate good moral character when getting their license and when renewing them. At a minimum, there should at least be some way for the public to access information regarding this requirement so they can make informed hiring decisions. None of these concerns are addressed by the proposed regulations. The fact is that if the Board wanted take action on these issues, it has the authority to do so. Over the past year and a half, the ranch has submitted over 100 pages of potential changes or solutions to address these issues, with the most recent suggestion being based on an idea of one of the members of the PFEC and only one page, along with legal and other research regarding good moral character requirements in other state licensing programs, but they have all been ignored. Rancho Guejito would like to support meaningful changes to the program that provide better protection of the public interest, but the proposed regulations today fail to do this. They not only fail to address the concerns raised by the ranch due to its unfortunate experience with CRM program, which included a licensed CRM harassing and attempting to extort the ranch and using his license to carry out and justify his actions, but actually weaken existing regulations, which the ranch cannot support. A more detailed comment letter on these issues was submitted on January 14, which we hope you received and have been able to consider. Thank you for your time and consideration.”

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