

**LOUISIANA PROFESSIONAL ENGINEERING
AND LAND SURVEYING BOARD
9643 BROOKLINE AVENUE, SUITE 121
BATON ROUGE, LOUISIANA 70809-1443
(225) 925-6291**

IN THE MATTER OF:) CORREEN C. ROBERTSON, P.E.) RESPONDENT) _____)	CASE NO. 2017-29 Received DEC 22 2020 By LAPELS Enforcement
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CONSENT ORDER

The Louisiana Professional Engineering and Land Surveying Board [hereinafter the “Board”], by and through its Executive Director, pursuant to authorization by the Board, and Correen C. Robertson, P.E. [hereinafter “Respondent”] hereby agree to the following:

At all times material hereto, Respondent was licensed in the State of Louisiana as a professional engineer, number PE-32937; however, her license was in an expired status from April 1, 2017 through July 4, 2018.

At all times material hereto, The MAP Group, Inc. [hereinafter “MGI”] was licensed in the State of Louisiana as a professional engineering firm, number EF-3226; however, its license was in an expired status from April 1, 2017 through August 22, 2018. At all times material hereto, Respondent was a representative and the supervising professional of MGI.

Prior to February 17, 2020, MAP Design Group, LLC [hereinafter “MDG”] was not licensed in the State of Louisiana as a professional engineering firm and, therefore, was not authorized to practice and/or offer to practice engineering in the State of Louisiana. MDG subsequently became licensed in the State of Louisiana as a professional engineering firm, number EF-6778, effective February 17, 2020. At all times material hereto, Respondent was an employee, officer, owner and representative of MDG. Respondent has been the supervising professional of MDG since February 17, 2020.

An investigation was opened based upon the Board’s receipt of an Affidavit of Complaint and documents which suggested that Respondent may have committed violations of the Board’s laws and/or rules. The investigation disclosed that between April 1, 2017 and July 4, 2018 Respondent admittedly offered to provide engineering services in Louisiana and provided

engineering services on approximately thirty-three (33) projects in Louisiana, approximately twenty-eight (28) of which were prior to May 4, 2018.

The investigation also disclosed that between April 1, 2017 and August 22, 2018 **(a)** MGI admittedly offered to provide engineering services in Louisiana and provided engineering services on approximately seventeen (17) projects in Louisiana and **(b)** Respondent provided engineering services for MGI in Louisiana in connection with said projects.

Additionally, the investigation disclosed that between April 25, 2017 and February 16, 2020 **(a)** MDG admittedly offered to provide engineering services in Louisiana and provided engineering services on approximately fifty-one (51) projects in Louisiana and **(b)** Respondent provided engineering services for MDG in Louisiana in connection with said projects.

Furthermore, the investigation disclosed that on or about May 4, 2018 Respondent submitted to the Board an Application to Reinstate Expired Individual License, confirming thereon that **(a)** she had not practiced or offered to practice engineering in Louisiana during the period in which her license was expired, **(b)** to the best of her knowledge, information and belief the statements and information on the application were true and correct in substance and effect and were made in good faith, **(c)** she had not omitted any information requested on the application and **(d)** an omission or untrue response on the application could constitute fraud, deceit, material misstatement, perjury or the giving of false or forged evidence under La. R.S. 37:698 and 37:700.

The investigation also disclosed that on February 11, 2020 the Board sent a letter to Respondent by certified mail (return receipt requested) and by email requesting that she provide to the Board certain information and documents relative to potential violations of the Board's laws and/or rules. Respondent has never responded to this letter.

La. R.S. 37:681 and La. R.S. 37:700(A)(1), (7) and (9), *to wit* LAC Title 46:LXI§2301(B), prohibit the practicing of and/or offering to practice engineering without proper licensure. La. R.S. 37:698(A)(1) prohibits any fraud, deceit, material misstatement or perjury, or the giving of any false or forged evidence, in applying for a renewal license with the Board. La. R.S. 37:698(A)(6), *to wit* LAC Title 46:LXI§2305, require supervising professionals of professional engineering firms to be responsible for renewal of the firm's license. La. R.S. 37:698(A)(6), *to wit* LAC Title 46:LXI§2501(E), require licensees to timely respond to all

inquiries and correspondence from the Board. La. R.S. 37:698(A)(9) and (16) prohibit licensees from practicing and/or offering to practice engineering with an expired license. La. R.S. 37:698(A)(10) requires licensees to provide, within thirty calendar days of receipt of notice by certified mail, information or documents requested by the Board relating to any alleged violation of the Board's laws. La. R.S. 37:698(A)(12) prohibits licensees from aiding or assisting another person in violating the laws and/or rules of the Board. La. R.S. 37:698(H) permits the Board to take disciplinary action against persons who violate La. R.S. 37:698(A)(1), La. R.S. 37:698(A)(6), *to wit* LAC Title 46:LXI§2305, La. R.S. 37:698(A)(6), *to wit* LAC Title 46:LXI§2501(E), La. R.S. 37:698(A)(9) and (16), La. R.S. 37:698(A)(10), and La. R.S. 37:698(A)(12), upon a finding of guilt following the preferral of charges, notice and hearing and a majority vote of its entire membership authorized to participate in the proceeding. La. R.S. 37:681, La. R.S. 37:698(A)(1), (6), (9), (10), (12) and (16), La. R.S. 37:698(H), La. R.S. 37:700(A)(1), (7) and (9), and LAC Title 46:LXI§2301(B), 2305 and 2501(E) were in effect at all times material hereto.

It is undisputed that **(a)** at all times material hereto Respondent was licensed in Louisiana as a professional engineer, however her license was in an expired status from April 1, 2017 through July 4, 2018, **(b)** at all times material hereto MGI was licensed in Louisiana as a professional engineering firm, however its license was in an expired status from April 1, 2017 through August 22, 2018, **(c)** at all times material hereto Respondent was a representative and the supervising professional of MGI, **(d)** prior to February 17, 2020 MDG was not licensed in Louisiana as a professional engineering firm and, therefore, was not authorized to practice and/or offer to practice engineering in Louisiana, **(e)** MDG subsequently became licensed in Louisiana as a professional engineering firm, effective February 17, 2020, **(f)** at all times material hereto Respondent was an employee, officer, owner and representative of MDG, **(g)** Respondent has been the supervising professional of MDG since February 17, 2020, **(h)** between April 1, 2017 and July 4, 2018 Respondent admittedly practiced and offered to practice engineering in Louisiana, **(i)** between April 1, 2017 and August 22, 2018 MGI admittedly practiced and offered to practice engineering in Louisiana and Respondent provided engineering services for MGI in Louisiana in connection with said work, **(j)** between April 25, 2017 and February 16, 2020 MDG admittedly practiced and offered to practice engineering in Louisiana and Respondent provided

engineering services for MDG in Louisiana in connection with said projects, **(k)** on or about May 4, 2018 Respondent submitted to the Board an Application to Reinstate Expired Individual License which falsely stated that she had not practiced or offered to practice engineering in Louisiana during the period in which her license was expired, **(l)** Respondent has failed to respond to a certified mail and emailed letter from the Board on February 11, 2020 requesting that she provide certain information and documents related to potential violations of the Board's laws and/or rules and **(m)** Respondent aided or assisted MDG in violating the laws and/or rules of the Board.

By letter dated November 13, 2020, the Board gave notice to Respondent that it was considering the preferral of charges against Respondent on the grounds that Respondent may have violated **(a)** La. R.S. 37:698(A)(1), relative to fraud, deceit, material misstatement or perjury, or the giving of any false or forged evidence, in applying for a renewal license with the Board; **(b)** La. R.S. 37:698(A)(6), *to wit* LAC Title 46:LXI§2305, relative to supervising professionals of professional engineering firms being responsible for renewal of the firm's license; **(c)** La. R.S. 37:698(A)(6), *to wit* LAC Title 46:LXI§2501(E), relative to the failure to timely respond to inquiries and correspondence from the Board; **(d)** La. R.S. 37:698(A)(9) and (16), relative to practicing and/or offering to practice engineering with an expired license; **(e)** La. R.S. 37:698(A)(10), relative to the failure to provide, within thirty calendar days of receipt of notice by certified mail, information or documents requested by the Board relating to any alleged violation of the Board's laws; and **(f)** La. R.S. 37:698(A)(12), relative to aiding or assisting another person in violating the laws and/or rules of the Board.

Wishing to dispense with the need for further disciplinary action and to conclude the instant proceeding without further delay and expense, for the purpose of this proceeding only, Respondent and the Board do hereby enter into this Consent Order, in which Respondent of her own free will consents to the issuance of a Consent Order by the Board, wherein Respondent agrees to **(a)** pay a fine of Four Thousand and No/100 (\$4,000.00) Dollars, **(b)** pay administrative costs of One Thousand Four Hundred Twenty and 68/100 (\$1,420.68) Dollars, **(c)** pay past unpaid renewal fees of One Hundred Twenty and No/100 (\$120.00) Dollars, **(d)** provide to the Board the information and documents requested by the Board in its February 11, 2020 certified mail and emailed letter to Respondent, **(e)** pay an additional fine of Five Hundred and

No/100 (\$500.00) Dollars, along with any administrative costs incurred in collecting said additional fine, if she fails to provide to the Board the requested information and documents, **(f)** successfully complete the Board's online Louisiana Laws and Rules Quiz, **(g)** successfully complete the Board's online Louisiana Professionalism and Ethics Quiz, **(h)** the immediate suspension of her Louisiana professional engineer license if she fails to comply with any part of this Consent Order, with such suspension continuing until she so complies, and **(i)** the publication of this Consent Order on the Board's website and a summary of this matter in the Board's official journal, the *Louisiana Engineer and Surveyor Journal*, and the reporting of this matter to the National Council of Examiners for Engineering and Surveying (NCEES), identifying Respondent by name.

Respondent admits that her conduct as set forth above constitutes violations of the above referenced laws and/or rules as stated herein. Respondent acknowledges awareness of said laws and/or rules and states that she will comply with all applicable laws and rules henceforth. Respondent has been advised of her right to an informal conference, to be represented by counsel before the Board and/or to appear at any hearing personally or by counsel and present witnesses and evidence in her own behalf, she hereby waives this right and her right to appeal, and she states affirmatively that she has been afforded all administrative remedies due her under the law. Respondent further acknowledges awareness of the fact that the signed original of this Consent Order will remain in the custody of the Board as a public record and will be made available for public inspection and copying upon request.

Therefore, in consideration of the foregoing and by signing this Consent Order, Respondent does hereby waive her right to an informal conference, to a hearing before the Board, to the presenting of evidence and witnesses on her behalf, to Findings of Fact and Conclusions of Law in this case, and to judicial review of this Consent Order.

Respondent hereby represents that **(a)** she fully understands the meaning and intent of this Consent Order, including but not limited to its final and binding effect, **(b)** she has voluntarily entered into this Consent Order and that no other promise or agreement of any kind has been made to or with her by any person whatsoever to cause the execution of this instrument and **(c)** the sanctions set forth in this Consent Order do not prevent the Board from taking further

disciplinary or enforcement action against Respondent on matters not specifically addressed in this Consent Order.

WHEREFORE, the Louisiana Professional Engineering and Land Surveying Board and Respondent agree that:

1. Respondent shall pay a fine of Four Thousand and No/100 (\$4,000.00) Dollars, which shall be tendered to the Board by certified check payable to the Board, due upon the signing of this Consent Order; and

2. Respondent shall pay administrative costs of One Thousand Four Hundred Twenty and 68/100 (\$1,420.68) Dollars, which shall be tendered to the Board by certified check payable to the Board, due upon the signing of this Consent Order; and

3. Respondent shall pay past unpaid renewal fees of One Hundred Twenty and no/100 (\$120.00) Dollars, which shall be tendered to the Board by certified check payable to the Board, due upon the signing of this Consent Order; and

4. Respondent shall provide to the Board within thirty (30) days of the effective date of this Consent Order the information and documents requested by the Board in its February 11, 2020 certified mail and emailed letter to Respondent; and

5. Respondent shall pay an additional fine of Five Hundred and No/100 (\$500.00) Dollars, along with any administrative costs incurred in collecting said additional fine, if she fails to provide to the Board within thirty (30) days of the effective date of this Consent Order the information and documents requested by the Board in its February 11, 2020 certified mail and emailed letter to Respondent, which additional fine and administrative costs shall be then immediately tendered to the Board by certified check payable to the Board; and

6. Respondent shall successfully complete the Board's online Louisiana Laws and Rules Quiz with a score of 90% or higher and return it to the Board within sixty (60) days of the effective date of this Consent Order; and

7. Respondent shall successfully complete the Board's online Louisiana Professionalism and Ethics Quiz with a score of 90% or higher and return it to the Board within sixty (60) days of the effective date of this Consent Order; and

8. Respondent's Louisiana professional engineer license, number PE-32937, shall be immediately suspended if she fails to comply with any part of this Consent Order, with such suspension continuing until she so complies; and

9. This Consent Order shall be published on the Board's website and a summary of this matter shall be printed in the official journal of the Board, the *Louisiana Engineer and Surveyor Journal*, and reported to the National Council of Examiners for Engineering and Surveying (NCEES), identifying Respondent by name; and

10. This Consent Order shall not become effective unless and until it is accepted and signed by and on behalf of the Board. Should the Board not accept and sign this Consent Order, it is agreed that presentation of this matter to the Board shall not prejudice the Board or any of its members, staff, attorneys or representatives from further participation, consideration, or resolution of any further proceedings herein.

LOUISIANA PROFESSIONAL ENGINEERING
AND LAND SURVEYING BOARD

DATE: 11 January 2021

BY: Donna D. Sentell
DONNA D. SENTELL, Executive Director

DATE: 12-15-20

Correen C. Robertson
CORREEN C. ROBERTSON, P.E., Respondent

Witnesses to the signature of
Correen C. Robertson, P.E.

Mervel Parcho
Print Name: Mervel Parcho

Inger Chamber
Print Name: Inger Chamber