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GRAHAM E BERRY

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ATTY GENERAL OFFICE

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BEFORE THE  
DEPARTMENT OF CONSUMER AFFAIRS  
FOR THE BUREAU OF SECURITY AND INVESTIGATIVE SERVICES  
DEPARTMENT OF CONSUMER AFFAIRS  
FOR THE BUREAU OF SECURITY AND INVESTIGATIVE SERVICES  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

Case No. A1 2010 0805

PAUL BARRESI DBA HOLLYWOOD  
CONFIDENTIAL INVESTIGATIONS  
11660 Church Street, #434  
Rancho Cucamonga, CA 91730  
Private Investigator License No. PI 26529

Respondent.


DECISION AND ORDER

The attached Stipulated Settlement and Disciplinary Order is hereby adopted by the  
Director of Consumer Affairs and the Bureau of Security and Investigative Services as the  
Decision and Order in the above entitled matter.

This Decision shall become effective on

DEC 07 2011

It is so ORDERED

  
FOR THE DIRECTOR OF CONSUMER AFFAIRS  
BUREAU OF SECURITY AND INVESTIGATIVE  
SERVICES

  
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GRAHAM E BERRY

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ATTY GENERAL OFFICE

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KAMALA D. HARRIS  
Attorney General of California  
KAMALA D. HARRIS  
Attorney General of California  
MARC D. GREENBAUM  
Supervising Deputy Attorney General  
SHAWN P. COOK  
Deputy Attorney General  
State Bar No. 117851  
300 So. Spring Street, Suite 1702  
Los Angeles, CA 90013  
Telephone: (213) 897-9954  
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Attorneys for Complainant

BEFORE THE  
DEPARTMENT OF CONSUMER AFFAIRS  
FOR THE BUREAU OF SECURITY AND INVESTIGATIVE SERVICES  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

Case No. AI 2010 0805

PAUL BARRESI DBA HOLLYWOOD  
CONFIDENTIAL INVESTIGATIONS  
11660 Church Street, #434  
Rancho Cucamonga, CA 91730  
Private Investigator License No. PI 26529

STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER

Respondent

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

PARTIES

1. Connie Bouvia (Complainant) is the Deputy Chief of the Bureau of Security and Investigative Services. She brought this action solely in her official capacity and is represented in this matter by Kamala D. Harris, Attorney General of the State of California, by Shawn P. Cook, Deputy Attorney General.

2. Respondent Paul Barresi dba Hollywood Confidential Investigations (Respondent) is represented in this proceeding by attorney Graham Berry, Esq., whose address is 3384 McLaughlin Ave., Los Angeles, CA 900663.

3. On or about September 2, 2009, the Bureau of Security and Investigative Services issued Private Investigator License No. PI 26529 to Paul Barresi dba Hollywood Confidential

STIPULATED SETTLEMENT (AI 2010 0805)

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Investigations (Respondent). The Private Investigator License was in full force and effect at all times relevant to the charges brought in Accusation No. A1 2010 0805 and expired on September 30, 2013, unless renewed.

#### JURISDICTION

4. Accusation No. A1 2010 0805 was filed before the Director of Consumer Affairs (Director), for the Bureau of Security and Investigative Services (Bureau), and is currently pending against Respondent. The Accusation and all other statutorily required documents were properly served on Respondent on November 16, 2011. A copy of Accusation No. A1 2010 0805 is attached as exhibit A and incorporated herein by reference.

#### ADVISEMENT AND WAIVERS

5. Respondent has carefully read, fully discussed with counsel, and understands the charges and allegations in Accusation No. A1 2010 0805. Respondent has also carefully read, fully discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary Order.

6. Respondent is fully aware of his legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to be represented by counsel at his own expense; the right to confront and cross-examine the witnesses against him; the right to present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

#### CULPABILITY

8. Respondent admits the truth of each and every charge and allegation in Accusation No. A1 2010 0805.



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9. Respondent agrees that his Private Investigator License is subject to discipline and he  
y. Respondent agrees that the terms of discipline as set forth in the Disciplinary Order  
agrees to be bound by the Director's imposition of discipline as set forth in the Disciplinary Order  
below.

CONTINGENCY

10. This stipulation shall be subject to approval by the Director of Consumer Affairs or  
his designee. Respondent understands and agrees that counsel for Complainant and the staff of  
the Bureau of Security and Investigative Services may communicate directly with the Director  
and staff of the Department of Consumer Affairs regarding this stipulation and settlement,  
without notice to or participation by Respondent or his counsel. By signing the stipulation,  
Respondent understands and agrees that he may not withdraw his agreement or seek to rescind the  
stipulation prior to the time the Director considers and acts upon it. If the Director fails to adopt  
this stipulation as the Decision and Order, the Stipulated Settlement and Disciplinary Order shall  
be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action  
between the parties, and the Director shall not be disqualified from further action by having  
considered this matter.

11. The parties understand and agree that facsimile copies of this Stipulated Settlement  
and Disciplinary Order, including facsimile signatures thereto, shall have the same force and  
effect as the originals.

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

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

///

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DISCIPLINARY ORDER


DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Private Investigator License No. PI 26529 issued to Respondent Paul Barresi dba Hollywood Confidential Investigations (Respondent) is revoked.

ACCEPTANCE

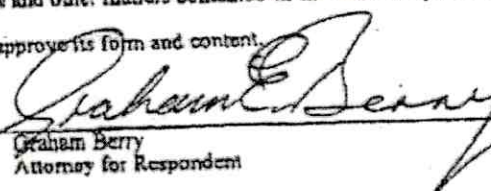
I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Graham Berry. I understand the stipulation and the effect it will have on my Private Investigator License. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Director of Consumer Affairs.

DATED: Nov 29, 2011

  
PAUL BARRESI DBA HOLLYWOOD  
CONFIDENTIAL INVESTIGATIONS  
Respondent

I have read and fully discussed with Respondent Paul Barresi dba Hollywood Confidential Investigations the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: Nov. 30, 2011

  
Graham Berry  
Attorney for Respondent

ENDORSEMENT

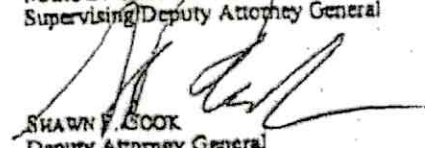
The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Director of Consumer Affairs.

Dated:

Respectfully submitted,

December 1, 2011

KAMALA D. HARRIS  
Attorney General of California  
MARC D. GREENBAUM  
Supervising Deputy Attorney General

  
SHAWN F. COOK  
Deputy Attorney General  
Attorney for Complainant

LA2011500874

STIPULATED SETTLEMENT (A1 2010 0805)

KAMALA D. HARRIS

KAMALA D. HARRIS  
Attorney General of California  
MARC D. GREENBAUM  
Supervising Deputy Attorney General  
SHAWN P. COOK  
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Los Angeles, CA 90013  
Telephone: (213) 897-9954  
Facsimile: (213) 897-2804  
*Attorneys for Complainant*

BEFORE THE  
DEPARTMENT OF CONSUMER AFFAIRS  
FOR THE BUREAU OF SECURITY AND INVESTIGATIVE SERVICES  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

Case No. A1 2010 8050

PAUL BARRESI DBA HOLLYWOOD  
CONFIDENTIAL INVESTIGATIONS  
11660 Church Street, #434  
Rancho Cucamonga, CA 91730  
Private Investigator License No. PI 26529

ACCUSATION AND PETITION TO  
REVOKE PROBATION

Respondent.

Complainant alleges:

PARTIES

1. Connie Trujillo (Complainant) brings this Accusation solely in her official capacity as the Deputy Chief of the Bureau of Security and Investigative Services, Department of Consumer Affairs.

2. On or about September 2, 2009, the Bureau of Security and Investigative Services issued Private Investigator License Number PI 26529 to Paul Barresi dba Hollywood Confidential Investigations (Respondent). The Private Investigator License was immediately revoked, with revocation stayed, and Respondent placed on three (3) years probation subject to certain terms and conditions. A true and correct copy of the terms and conditions of probation imposed on Respondent's license are attached hereto as Exhibit A. The Private Investigator License was in



full force and effect at all times relevant to the charges brought herein and will expire on  
full force and effect at all times relevant to the charges brought herein and will expire on  
September 30, 2012, unless renewed.

### JURISDICTION

3. This Accusation and Petition to Revoke Probation is brought before the Director of Consumer Affairs (Director) for the Bureau of Security and Investigative Services, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

4. Section 22 of the Code states:

"(a) 'Board' as used in any provisions of this Code, refers to the board in which the administration of the provision is vested, and unless otherwise expressly provided, shall include 'bureau,' 'commission,' 'committee,' 'department,' 'division,' 'examining committee,' 'program,' and 'agency.'

"(b) Whenever the regulatory program of a board that is subject to review by the Joint Committee on Boards, Commissions, and Consumer Protection, as provided for in Division 1.2 (commencing with Section 473), is taken over by the department, that program shall be designated as a 'bureau.'"

5. Section 118, subdivision (b), of the Code provides that the suspension/ expiration/ surrender/ cancellation of a license shall not deprive the Board/Registrar/Director of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated.

6. Section 150 of the Code states: "The department is under the control of a civil executive officer who is known as the Director of Consumer Affairs."

7. Section 475 of the Code states:

"(a) Notwithstanding any other provisions of this code, the provisions of this division shall govern the denial of licenses on the grounds of:

"(1) Knowingly making a false statement of material fact, or knowingly omitting to state a material fact, in an application for a license.

"(2) Conviction of a crime.

"(3) Commission of any act involving dishonesty, fraud or deceit with the

"(3) Commission of any act involving dishonesty, fraud or deceit with the  
intent to substantially benefit himself or another, or substantially injure another.

"(4) Commission of any act which, if done by a licentiate of the business or  
profession in question, would be grounds for suspension or revocation of license.

"(b) Notwithstanding any other provisions of this code, the provisions of this division shall  
govern the suspension and revocation of licenses on grounds specified in paragraphs (1) and (2)  
of subdivision (a).

"(c) A license shall not be denied, suspended, or revoked on the grounds of a lack of good  
moral character or any similar ground relating to an applicant's character, reputation, personality,  
or habits."

8. Section 477 of the Code states:

As used in this division:

"(a) 'Board' includes 'bureau,' 'commission,' 'committee,' 'department,' 'division,'  
'examining committee,' 'program,' and 'agency.'

"(b) 'License' includes certificate, registration or other means to engage in a  
business or profession regulated by this code."

9. Section 480 of the Business and Professions Code provides, in pertinent part, that a  
board may deny a license if the applicant has been convicted of a crime substantially related to  
the qualifications, functions or duties of the business or profession for which application is made,  
has committed any act involving dishonesty, fraud or deceit, has committed any act which if done  
by a licentiate would be grounds for suspension or revocation of a license, or has knowingly made  
a false statement of fact required to be revealed in the application.

10. Section 490 of the Code provides, in pertinent part, that a board may suspend or  
revoke a license on the ground that the licensee has been convicted of a crime substantially  
related to the qualifications, functions, or duties of the business or profession for which the  
license was issued..

11. Section 493 of the Code states:



1 "Notwithstanding any other provision of law, in a proceeding conducted by a board within  
1 "Notwithstanding any other provision of law, in a proceeding conducted by a board within  
2 the department pursuant to law to deny an application for a license or to suspend or revoke a  
3 license or otherwise take disciplinary action against a person who holds a license, upon the  
4 ground that the applicant or the licensee has been convicted of a crime substantially related to the  
5 qualifications, functions, and duties of the licensee in question, the record of conviction of the  
6 crime shall be conclusive evidence of the fact that the conviction occurred, but only of that fact,  
7 and the board may inquire into the circumstances surrounding the commission of the crime in  
8 order to fix the degree of discipline or to determine if the conviction is substantially related to the  
9 qualifications, functions, and duties of the licensee in question.

10 "As used in this section, 'license' includes 'certificate,' 'permit,' 'authority,' and  
11 'registration.'"

12 12. Section 7512.1 of the Code states that as used in this chapter, "director" means the  
13 Director of Consumer Affairs.

14 13. Section 7520 of the Code states that no person shall engage in a business regulated by  
15 this chapter; act or assume to act as, or represent himself or herself to be, a licensee unless he or  
16 she is licensed under this chapter; and no person shall falsely represent that he or she is employed  
17 by a licensee.

18 14. Section 7531 of the Code provides that a licensee shall at all times be legally  
19 responsible for the good conduct in the business of each of his or her employees or agents,  
20 including his or her manager.

21 15. Section 7538 of the Code states in pertinent part:

22 "After a hearing the director may deny a license unless the applicant makes a showing  
23 satisfactory to the director that the applicant, if an individual, has not, or if the applicant is a  
24 person other than an individual, that its manager and each of its officers have not:

25 "(a) Committed any act, which, if committed by a licensee, would be a ground for the  
26 suspension or revocation of a license under this chapter.

27 "(b) Committed any act constituting dishonesty or fraud.  
28

1       "(c) Committed any act or crime constituting grounds for denial of licensure under Section  
1       "(c) Committed any act or crime constituting grounds for denial of licensure under Section  
2 480, including illegally using, carrying, or possessing a deadly weapon.

3       16. Section 7539, subd. (b) of the Code states: "No licensee or officer, director, partner,  
4 manager, or employee of a licensee shall knowingly make any false report to his or her employer  
5 or client for whom information was being obtained."

6       17. Section 7561.1 of the Code provides in pertinent part: "The director may deny,  
7 suspend, or revoke a license issued under this chapter if he or she determines that the licensee or  
8 his or her manager, if an individual, or if the licensee is a person other than an individual, that any  
9 of its officers, directors, partners, or its manager, has:

10       (l) Committed any act which is a ground for denial of an application for a license under this  
11 chapter."

12       18. Section 7561.4 of the Code provides in pertinent part that the director may suspend or  
13 revoke a license issued under this chapter if he or she determines that the licensee or his or her  
14 manager, if an individual, or if the licensee is a person other than an individual, that any of its  
15 officers, directors, partners, or its manager, has committed any act in the course of the licensee's  
16 business constituting dishonesty or fraud.

17       "Dishonesty or fraud" as used in this section, includes, in addition to other acts not  
18 specifically enumerated herein:

19       "(a) Knowingly making a false statement relating to evidence or information obtained in the  
20 course of employment, or knowingly publishing a slander or a libel in the course of business.

21       ....

22       "(c) Manufacture of evidence.

23       19. Section 7562 of the Code provides that the record of conviction, or a certified copy  
24 thereof, shall be conclusive evidence of the conviction as that term is used in this article, or  
25 sections 7538 or 480. A plea or verdict of guilty or a conviction following a plea of nolo  
26 contendere is deemed a conviction within the meaning of this article, or sections 7538 or 480.

27       20. Section 125.3, subdivision (a), states, in pertinent part: "Except as otherwise  
28 provided by law, in any order issued in resolution of a disciplinary proceeding before any board

1 within the department . . . the board may request the administrative law judge to direct a licentiate  
1 within the department . . . the board may request the administrative law judge to direct a licentiate  
2 found to have committed a violation or violations of the licensing act to pay a sum not to exceed  
3 the reasonable costs of the investigation and enforcement of the case."

4 ACCUSATION

5 FIRST CAUSE FOR DISCIPLINE

6 (Dishonesty or Fraud-False Statement)

7 21. Respondent is subject to disciplinary action under section 7561.4, subd. (a), in that  
8 Respondent has knowingly made a false statement relating to evidence or information obtained in  
9 the course of employment, or knowingly published a slander or a libel in the course of business.  
10 The circumstances are as follows:

11 22. In or about April and May, 2010, Respondent, identifying himself as a private  
12 investigator, contacted the human resources department at Pomona Valley Hospital Medical  
13 Center (PVH) and informed them that he was conducting an investigation against [REDACTED]  
14 ("[REDACTED]"), who worked at PVH as a registered nurse in the Neo-natal ICU. Thereafter, PVH  
15 officials conducted a pharmaceutical inventory check for drugs and controlled substances  
16 accessible to [REDACTED] and found no discrepancies and that Respondent's allegations were without  
17 merit.

18 23. On or about May 11, 2010, Respondent wrote a letter addressed to Pomona Valley  
19 Hospital Medical Center (PVH) and the Hesperia, CA police department, with a letterhead stating  
20 "PAUL BARRESI STATE OF CALIFORNIA PRIVATE INVESTIGATOR, License No.  
21 P126529." In the letter, Respondent made false statements concerning [REDACTED]  
22 ([REDACTED]), a registered nurse employed at PVH and with whom Respondent had a previous  
23 relationship. Respondent published the following false statements about [REDACTED]

24 a. [REDACTED] met Respondent's process server at her door on May 11, 2010 holding a glass  
25 pipe (controlled substance apparatus) in her hand.

26 b. [REDACTED] yelled and screamed uncontrollably at the process server and appeared  
27 disoriented.



24. By letter dated June 25, 2010, Respondent wrote to the human resources department at PVH and admitted that the allegations he had made in April and May, 2010 against [REDACTED] "alleging drug abuse is absolutely false and without fact or basis." Respondent further admitted that he "lodged said claims out of retaliation because [REDACTED] had terminated our relationship" and stated that [REDACTED] was "an extremely competent, highly respected, conscientious nurse, at the top of her field, and not once did she ever demonstrate the slightest indication to the contrary."

25. On or about May 26, 2010, Respondent wrote a letter referenced "DRUG ABUSE COMPLAINT: [REDACTED], CA Registered Nurse" addressed to the California Board of Nursing, attention "NURSE COMPLAINT EXAMINERS", with a letterhead stating "PAUL BARRESI CALIFORNIA STATE PRIVATE INVESTIGATOR, LIC. NUM. P126529." In the letter, Respondent published the following false statements concerning Alvarez under penalty of perjury:

- a. [REDACTED] filed a petition for TRO against Respondent after Respondent told her that he intended to report her for "drug abuse (Smoking methamphetamine and use of non-prescribed prescription drugs.)"
- b. Respondent personally witnessed [REDACTED] take his "own personal doctor prescribed medication."
- c. Respondent witnessed [REDACTED] take on "characteristics and symptoms associated with methamphetamine abuse, including unexplained rise in her body temperature (low grade fevers), tweaking, eye twitching, high blood pressure, liver pain, mood swings, weight gain, extreme weight loss, insomnia, irritability and dilated pupils."
- d. Respondent stated that after he had been "dating" [REDACTED] for two months, [REDACTED] asked him to "run a criminal check on" [REDACTED] male housemate, "confiding that [the housemate] was not forthcoming with [REDACTED] on the extent of his drug abuse".
- e. Respondent stated that [REDACTED] "drug abuse is low intensity and she prefers to smoke it, the potential harm and possible death she may cause in her profession should not go uninvestigated."

1 f. Respondent stated that [REDACTED] on May 11, 2010, appeared at the door when  
1 f. Respondent stated that [REDACTED] on May 11, 2010, appeared at the door when  
2 Respondent's process server attempted to serve her and that [REDACTED] was "disoriented, screaming  
3 at him out of control, and holding a glass pipe (apparatus used for smoking crystal meth)."

4 26. By letter dated July 2, 2010, Respondent wrote to the Department of Consumer  
5 Affairs, Board of Registered Nursing ("Board"), and admitted that the allegations he had made in  
6 his complaint that the filed with the Board against [REDACTED] alleging drug abuse "was without fact  
7 or basis and is completely and utterly false." Respondent further admitted that he "lodged said  
8 complaint" alleging drug use "from an evil and improper motive on my part, for no reason other  
9 than to retaliate against her for having broken off a year long relationship I had with her. . . . The  
10 truth is that I have never seen her take a controlled substance of any kind whatsoever, prescription  
11 drugs or otherwise."

#### 12 SECOND CAUSE FOR DISCIPLINE

13 (Slander/or Libel in the Course of Business)

14 27. Respondent is subject to disciplinary action under section 7561.4, subd. (a), in that  
15 Respondent has knowingly published a slander or a libel in the course of business. The  
16 circumstances are as alleged in the preceding paragraphs 22 through 26 and all subparts, which  
17 are incorporated here by this reference.

#### 18 THIRD CAUSE FOR DISCIPLINE

19 (Manufacturing Evidence)

20 28. Respondent is subject to disciplinary action under section 7561.4, subd. (c), in that  
21 Respondent has manufactured evidence. The circumstances are as alleged in the preceding  
22 paragraphs 22 through 26 and all subparts, which are incorporated here by this reference.

#### 23 FOURTH CAUSE FOR DISCIPLINE

24 (Making False Report)

25 29. Respondent is subject to disciplinary action under section 7539 subd. (b), in that  
26 Respondent made a false report. The circumstances are as alleged in the preceding paragraphs  
27 25, subpart (d) and 26.

28 ///

FIFTH CAUSE FOR DISCIPLINE  
FIFTH CAUSE FOR DISCIPLINE

(Acts that Would be Grounds for Denial)

30. Respondent is subject to disciplinary action under section 7561, subd. (1) in conjunction with sections 7538, subdivisions (a) through (e), and 480. The circumstances are as alleged in the preceding paragraphs 22 through 26 and all subparts, which are incorporated here by this reference.

PETITION TO REVOKE PROBATION  
FIRST CAUSE FOR REVOCATION

(Obey All Laws)

31. Respondent's probation with the Bureau contained as Condition Six, the requirement that Respondent "[s]hall obey all federal, state and local laws and all rule and regulations governing the programs regulated by the Bureau."

32. Respondent has violated the term and condition of his probation that he obey all laws. The circumstances are as alleged in the preceding paragraphs 22 through 26 and all subparts, which are incorporated here by this reference.




P R A Y E R

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Director of Consumer Affairs issue a decision:

1. Revoking or suspending Private Investigator License Number PI 26529, issued to Paul Barresi dba Hollywood Confidential Investigations;
2. Ordering Paul Barresi to pay the Bureau of Security and Investigative Services the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;
3. Lifting the stay of revocation imposed under Paul Barresi's existing probation with the Bureau and revoking Private Investigator License Number PI 26529, issued to Paul Barresi dba Hollywood Confidential Investigations; and
4. Taking such other and further action as deemed necessary and proper.

DATED: July 7, 2011

  
CONNIE TRUJILLO  
Deputy Chief  
Bureau of Security and Investigative Services  
Department of Consumer Affairs  
State of California  
Complainant

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