COMES NOW the Iowa Board of Cosmetology Arts and Sciences Examiners and states:

1. On or about April 1, 1999, the Iowa Board of Cosmetology Arts and Sciences Examiners (“Board”) issued cosmetology license number 843-58540 to Respondent. Respondent’s license to practice cosmetology lapsed on March 31, 2001.

2. Board records indicate that Respondent’s last known address is 2603 Main Street, Lot #3, Lansing, Iowa 52151.

3. Licenses issued by the Board are subject to the laws of the state of Iowa and the administrative rules promulgated by the Board.

4. The penalties authorized under Iowa law which the Board may impose against any licensed cosmetologist found to have engaged in prohibited conduct include but are not limited to imposition of a civil monetary penalty up to $1,000 and/or revocation of the licensee’s cosmetology license. See Iowa Code sections 157.9, 272C.3 (2003) and 645 Iowa Administrative Code (IAC) rules 13.1 and 65.3.

5. Pursuant to Iowa Code chapters 17A, 157, and 272C, the Board has jurisdiction of this matter.

COUNT I
6. Respondent practiced cosmetology with or without compensation without a license in violation of Iowa Code section 157.2 and 645 IAC rules 60.11 and 64.6.

COUNT II

7. Respondent violated a rule and law of the state of Iowa relating to the practice of cosmetology by practicing cosmetology without a license in violation of Iowa Code section 157.2 and 645 IAC rules 60.11 and 64.6.

COUNT III

8. Respondent represented herself as a licensed individual during a period of time in which her license was lapsed.

CIRCUMSTANCES OF COUNTS I-III

9. Despite her license to practice cosmetology lapsing on or about March 31, 2001, Respondent accepted employment at

10. Pursuant to Iowa Code sections 157.6, 157.9, 157.13, 157.14 and 645 IAC 65.2(13), a license issued by the Board is subject to discipline if a licensee violates a rule promulgated by the Board.

FINDING OF PROBABLE CAUSE

On May 5, 2004, the Board found probable cause to file this Statement of Charges and to order a hearing set in this case.

This Statement of Charges was approved by the board on August 4, 2004.