TO THE ABOVE NAMED RESPONDENT:

Pursuant to Iowa Code Chapters 17A, 157, and 272C (1999, 2001) the Iowa Board of Cosmetologist Arts and Sciences (Board) has jurisdiction of this matter. Licenses issued by the Board are subject to the laws of the State of Iowa and the administrative rules promulgated by the Board.

COUNT I

Respondent is charged with practicing cosmetology arts and sciences while his license was lapsed or otherwise delinquent for any reason. See Iowa Code §§ 157.2, 157.9 (1999, 2001); 645 IAC 65.12(6) [now 645 IAC 65.1(6)].

CIRCUMSTANCES

1. The Board issued cosmetology license number 843-46188 to the Respondent on November 22, 1983. Record’s maintained by the Board indicate that the Respondent’s cosmetology license expired on March 31, 1994.
2. Respondent has not made application to the Board to renew his cosmetology license or otherwise brought his license into good standing since it expired in 1994.

3. Respondent repeatedly engaged in the practice of cosmetology arts and sciences after his license lapsed.

4. The Respondent has engaged in conduct that violates the laws and rules governing the practice of cosmetology arts and sciences in the State of Iowa and the Board has jurisdiction to initiate a disciplinary proceeding in this case.

**FINDING OF PROBABLE CAUSE**

On August 7, 2001, the Iowa Board of Cosmetology Arts and Sciences found probable cause to file this Statement of Charges and to order a hearing set in this case.

This Statement of Charges is approved by the board on September 10th, 2001.