

STATE OF IOWA  
BEFORE THE BOARD OF COSMETOLOGY ARTS & SCIENCES EXAMINERS

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IN THE MATTER OF:	)	
	)	NO: _____
MICHELLE BROWN	)	
Probationary License No. 843-56018	)	<b>STATEMENT OF CHARGES</b>
	)	
RESPONDENT.	)	

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COMES NOW the Complainant, Ella Mae Baird, and states:

1. The Complainant is the Administrator of the Iowa Board of Cosmetology Arts and Sciences Examiners (Board) and files these charges on behalf of the Board solely in her official capacity.
2. The Board has jurisdiction of this matter pursuant to Iowa Code chapters 17A, 157, and 272C (2003).
3. Michelle Brown (Respondent) was first licensed as a cosmetologist on August 30, 1993. Respondent was issued license number 843-56018.
4. Respondent's license lapsed on March 31, 2003. In an application for reinstatement, Respondent indicated to the Board that she had been convicted of a felony. On March 4, 2004, a Consent Agreement and Order was entered and Respondent's license was reinstated subject to a probationary period of two years.
5. As a term of her probation, Respondent is required not less than twice per year to participate in a chemical screening program approved by the Board. Respondent applied to participate in a chemical screening program offered by FirstLab, but has not participated in the program.

6. Pursuant to 645 Iowa Administrative Code (IAC) rule 65.2(21), cosmetologists are subject to discipline if they fail to comply with the terms of a board order or the terms of a settlement agreement or consent order.

7. On August 4, 2004, the Board found probable cause to file the following charges:

#### **COUNT I**

8. Respondent failed to comply with the terms of a board order or the terms of a settlement agreement or consent order in violation of 645 IAC rule 65.2(21).

WHEREFORE, the Complainant requests that a hearing be held in this matter and that the Board take such action as it deems appropriate under the law.

#### **FINDING OF PROBABLE CAUSE**

On August 4, 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 is approved by the board on November 3, 2004.**