

STATE OF ILLINOIS
DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION
DIVISION OF PROFESSIONAL REGULATION

DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION
OF THE State OF Illinois,)
Complainant)
)
v.) No. 200908197
)
Charles A. Woodcox)
License No. 034012126, Respondent)

COMPLAINT

Now comes the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois, by its Acting Chief of Business Prosecutions, Bill Laskaris, and as its COMPLAINT against Charles A. Woodcox, Respondent, complains as follows:

COUNT I

1. Respondent, Charles A. Woodcox, is presently the holder of a Certificate of Registration to practice as a Funeral Director and Embalmer in the State of Illinois, License No. 034012126 issued by the Department of Financial and Professional Regulation of the State of Illinois "Department". Said license is in active status.

2. At all times pertinent to this Complaint, the Respondent offers and provides, or in the past did offer funeral and embalming services within the State of Illinois.

3. That pursuant to authority granted under the

Funeral Directors Licensing Code, the Department issued a Subpoena Duces Tecum ("Subpoena") on July 20, 2009. (Attached Exh. 1).

3. That on or about July 20, 2009, Respondent was sent by certified mail the Subpoena to his last known address of record with the Department.

4. That said Subpoena requested that certain documents and records be available on or before August 6, 2009.

5. That as of October 6, 2009, Respondent has still not delivered or forwarded any materials requested in the Subpoena to the Department.

6. That Respondent's foregoing acts and/or omissions constitute unethical or unprofessional conduct of a character likely to deceive, defraud or harm the public and are grounds for the Department to suspend, revoke or otherwise discipline his certificate of registration pursuant to 225 ILCS (2006), Section 41/15-75(b)(19).

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois, by Bill Laskaris, Acting Chief of Business Prosecutions, prays that the license of Charles A. Woodcox to practice as a Funeral Director and Embalmer in the State of Illinois be suspended, revoked or otherwise disciplined.

COUNT II

1-5. The Department adopts and realleges paragraphs 1 through 5 of Count I of this Complaint as paragraphs 1 through 5 of Count II.

6. Respondent's foregoing acts and/or omissions constitute incompetence or untrustworthiness in funeral practice and are grounds for the Department to suspend, revoke or otherwise discipline his certificate of registration pursuant to 225 ILCS (2006), Section 41/15-75(b)(5).

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois, by Bill Laskaris, Acting Chief of Business Prosecutions, prays that the license of Charles A. Woodcox to practice as a Funeral Director and Embalmer in the State of Illinois be suspended, revoked or otherwise disciplined.

COUNT III

1-5. The Department adopts and realleges paragraphs 1 through 5 of Count I of this Complaint as paragraphs 1 through 5 of Count III.

6. Respondent's foregoing acts and/or omissions constitute performing any act or practice that is a violation of the Funeral Directors Licensing Code "Code", the rules for the administration of the Code, or regulations governing the

practice of funeral directing or embalming and are grounds for the Department to suspend, revoke or otherwise discipline his certificate of registration pursuant to 225 ILCS (2006), Section 41/15-75(b)(17).

WHEREFORE, based on the foregoing allegations, the DEPARTMENT OF FINANCIAL AND PROFESSIONAL REGULATION of the State of Illinois, by Bill Laskaris, Acting Chief of Business Prosecutions, prays that the license of Charles A. Woodcox to practice as a Funeral Director and Embalmer in the State of Illinois be suspended, revoked or otherwise disciplined.

DEPARTMENT OF FINANCIAL AND
PROFESSIONAL REGULATION, DIVISION
OF PROFESSIONAL REGULATION
of the State of Illinois

By: _____
Bill Laskaris
Acting Chief of Business Prosecutions

Attorney for the Department of
Financial and Professional
Regulation of the State of Illinois
100 West Randolph St., Suite 9-300
Chicago, IL 60601
(312) 814-5902