

BEFORE THE  
REGISTRAR OF CONTRACTORS  
CONTRACTORS STATE LICENSE BOARD  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

**TOM BEATTIE INC**  
**dba ROYAL ROOFING CO**  
1144 N. Armando Street  
Anaheim, CA 92806  
THOMAS GEOFFREY BEATTIE,  
RMO/CEO-President  
Contractor's License No. 289222 C39

Respondent.

CASE NO. N2011-385

ORDER TO ADOPT  
STIPULATED SETTLEMENT

The attached Stipulated Settlement is hereby adopted by the Registrar of Contractors as her Decision in the above-entitled matter. The failure to comply with any of the terms and conditions as set forth in the provisions of probation will be deemed a violation of probation.

IT IS FURTHER ORDERED that TOM BEATTIE INC dba ROYAL ROOFING CO, License Number 289222, on the effective date of this Decision shall have on file a Disciplinary Bond or post a cash deposit in the amount of \$30,000.00, for a period of not less than three years pursuant to Section 7071.8 of the Business and Professions Code. Any suspension for failing to post a disciplinary bond or a cash deposit, or any suspension for any other reason, shall not relieve the Respondent from complying with the terms and conditions of probation. Furthermore, suspension of the license during the period of probation, for any reason under this chapter, will cause the probationary period to be automatically extended in time equal to the length of time that the license is not in a clear and active status.

IT IS FURTHER ORDERED that respondent shall pay the investigative costs in the amount of \$2,838.50. Monthly payments are to be made in the amount of \$259.00, until completed. Payments are to be made at the end of each month, commencing the first full month after the effective date of this decision.

IT IS THE responsibility of the respondents, named in this Order, to read and follow the Order. The deadlines for meeting the terms and conditions are based upon the EFFECTIVE DATE of this Decision. No notices or reminders will be sent as to compliance with the terms and conditions. Proof of payments of restitution and payments for the Cost of Investigation and Enforcement if ordered, are to be sent to CSLB, Sacramento Case Management, Post Office Box 26888, Sacramento, CA 95826.

This Decision shall become effective on August 10, 2015.

IT IS SO ORDERED July 8, 2015.

  
Cindi A. Christenson  
Registrar of Contractors

1 KAMALA D. HARRIS  
Attorney General of California  
2 MARC D. GREENBAUM  
Supervising Deputy Attorney General  
3 SHAWN P. COOK  
Deputy Attorney General  
4 State Bar No. 117851  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 897-9954  
6 Facsimile: (213) 897-2804  
*Attorneys for Complainant*

7  
8 **BEFORE THE**  
**REGISTRAR OF CONTRACTORS**  
**CONTRACTORS' STATE LICENSE BOARD**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**  
10

11 In the Matter of the Accusation Against:

Case No. N2011-385

12 **TOM BEATTIE, INC. DBA ROYAL**  
**ROOFING CO.; THOMAS GEOFFREY**  
13 **BEATTIE, RMO/CEO-PRESIDENT**  
1144 N. Armando Street  
14 Anaheim, CA 92806  
Contractor's License No. 289222

**STIPULATED SETTLEMENT AND**  
**DISCIPLINARY ORDER**

15  
16 Respondent.

17  
18 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
19 entitled proceedings that the following matters are true:

20 PARTIES

21 1. Wood Robinson ("Complainant") is the Enforcement Supervisor I of the Contractors'  
22 State License Board. He brought this action solely in his official capacity and is represented in  
23 this matter by Kamala D. Harris, Attorney General of the State of California, by Shawn P. Cook,  
24 Deputy Attorney General.

25 2. Respondent Tom Beattie, Inc. dba Royal Roofing Co.; Thomas Geoffrey Beattie,  
26 RMO/CEO-President ("Respondent") is represented in this proceeding by attorney Thomas Song,  
27 Esq., whose address is: Ogletree, Deakins, Nash, Smoak & Stewart, P.C., 695 Tower Center  
28 Drive; Park Tower, Suite 1500; Costa Mesa, CA 92626.

1 3. On or about December 14, 1973, the Contractors' State License Board issued  
2 Contractor's License No. 289222 to Tom Beattie, Inc. dba Royal Roofing Co.; Thomas Geoffrey  
3 Beattie, RMO/CEO-President (Respondent). The Contractor's License was in full force and  
4 effect at all times relevant to the charges brought in Accusation No. N2011-385 and will expire  
5 on July 31, 2015, unless renewed.

6 JURISDICTION

7 4. Accusation No. N2011-385 was filed before the Registrar of Contractors (Registrar)  
8 for the Contractors' State License Board, Department of Consumer Affairs, and is currently  
9 pending against Respondent. The Accusation and all other statutorily required documents were  
10 properly served on Respondent on August 9, 2013. Respondent timely filed its Notice of Defense  
11 contesting the Accusation.

12 5. A copy of Accusation No. N2011-385 is attached as exhibit A and incorporated  
13 herein by reference.

14 ADVISEMENT AND WAIVERS

15 6. Respondent has carefully read, fully discussed with counsel, and understands the  
16 charges and allegations in Accusation No. N2011-385. Respondent has also carefully read, fully  
17 discussed with counsel, and understands the effects of this Stipulated Settlement and Disciplinary  
18 Order.

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

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

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1 CULPABILITY

2 9. Respondent understands and agrees that the charges and allegations in Accusation  
3 No. N2011-385, if proven at a hearing, constitute cause for imposing discipline upon its  
4 Contractor's License.

5 10. For the purpose of resolving the Accusation without the expense and uncertainty of  
6 further proceedings, Respondent agrees that, at a hearing, Complainant could establish a factual  
7 basis for the charges in the Accusation, and that Respondent hereby gives up its right to contest  
8 those charges.

9 11. Respondent agrees that its Contractor's License is subject to discipline and they agree  
10 to be bound by the Registrar's probationary terms as set forth in the Disciplinary Order below.

11 RESERVATION

12 12. The statements made by Respondent herein are only for the purposes of this  
13 proceeding, or any other proceedings in which the Registrar of Contractors, Contractors' State  
14 License Board, or other professional licensing agency is involved, and shall not be admissible in  
15 any other criminal or civil proceeding.

16 CONTINGENCY

17 13. This stipulation shall be subject to approval by the Registrar of Contractors or his  
18 designee. Respondent understands and agrees that counsel for Complainant and the staff of the  
19 Contractors' State License Board may communicate directly with the Registrar regarding this  
20 stipulation and settlement, without notice to or participation by Respondent or its counsel. By  
21 signing the stipulation, Respondent understands and agrees that they may not withdraw its  
22 agreement or seek to rescind the stipulation prior to the time the Registrar considers and acts upon  
23 it. If the Registrar fails to adopt this stipulation as its Decision and Order, the Stipulated  
24 Settlement and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall  
25 be inadmissible in any legal action between the parties, and the Registrar shall not be disqualified  
26 from further action by having considered this matter.

27

28

1 14. The parties understand and agree that Portable Document Format (PDF) and facsimile  
2 copies of this Stipulated Settlement and Disciplinary Order, including Portable Document Format  
3 (PDF) and facsimile signatures thereto, shall have the same force and effect as the originals.

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

10 16. In consideration of the foregoing admissions and stipulations, the parties agree that  
11 the Registrar may, without further notice or formal proceeding, issue and enter the following  
12 Disciplinary Order:

13 **DISCIPLINARY ORDER**

14 IT IS HEREBY ORDERED that Contractor's License No. 289222 issued to Respondent  
15 Tom Beattie, Inc. dba Royal Roofing Co.; Thomas Geoffrey Beattie, RMO/CEO-President  
16 (Respondent) is revoked. However, the revocation is stayed and Respondent is placed on  
17 probation for three (3) years on the following terms and conditions.

18 1. **Obey All Laws.** Respondent shall comply with all federal, state and local laws,  
19 including all building laws and uniform codes, governing the activities of a licensed contractor in  
20 California.

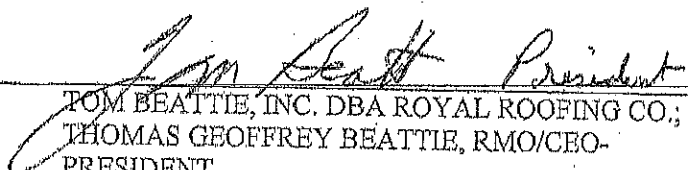
21 2. **Interviews With Enforcement Representative.** Respondent and any of  
22 Respondent's personnel of record shall appear in person for interview with the Registrar or  
23 designee upon request and reasonable notice during the probationary period.

24 3. **Completion Of Probation.** Upon successful completion of probation, the  
25 Contractor's License will be fully restored.

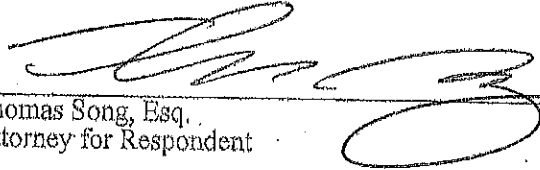
26 4. **Violation Of Probation.** If Respondent violates probation or any condition of  
27 probation in any respect, the Registrar, after giving notice and opportunity to be heard, may  
28 revoke probation and impose the disciplinary order that is stayed. If an accusation or petition to



1 will have on my Contractor's License. I enter into this Stipulated Settlement and Disciplinary  
2 Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order  
3 of the Registrar of Contractors, Contractors' State License Board.

4  
5 DATED: 6/2/15  President  
6 TOM BEATTIE, INC. DBA ROYAL ROOFING CO.;  
7 THOMAS GEOFFREY BEATTIE, RMO/CEO-  
8 PRESIDENT  
9 Respondent

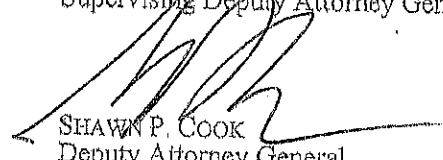
10 I have read and fully discussed with Respondent Tom Beattie, Inc. dba Royal Roofing Co.;  
11 Thomas Geoffrey Beattie, RMO/CEO-President the terms and conditions and other matters  
12 contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and  
13 content.

14 DATED: 6/3/2015   
15 Thomas Song, Esq.  
16 Attorney for Respondent

17 ENDORSEMENT

18 The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully  
19 submitted for consideration by the Registrar of Contractors, Contractors' State License Board.  
20 Dated: 4 June 2015 Respectfully submitted,

21 KAMALA D. HARRIS  
22 Attorney General of California  
23 MARC D. GREENBAUM  
24 Supervising Deputy Attorney General

25   
26 SHAWN P. COOK  
27 Deputy Attorney General  
28 Attorneys for Complainant

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