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

13 In the Matter of the First Amended Accusation
and Petition to Revoke Probation Against:

Case No. N2018-312

**FIRST AMENDED ACCUSATION AND
PETITION TO REVOKE PROBATION**

14 **ROYAL D C CONSTRUCTION, INC.**
15 **8581 Younger Creek Road**
16 **Sacramento, California 95828**
17 **MARIO ALBERTO DIAZ MARTINEZ,**
RMO B, CEO-PRESIDENT
18 **ALFREDO RAMOS, RMO C35**
KENNETH ALLEN JOSEPH EDWARDS,
19 **RMO C39**
WALTER LEONARD MASTERS,
20 **RMO C10**
(Disassociated 09/04/2018)
21 **MARK THOMAS LANNING, RMO B**
(Disassociated 09/24/2018)
22 **JONATHAN CRAIG CRANE, RMO C20**
(Disassociated 12/21/2018)
23 **Contractor's License No. 985351 B, C35, C39**

Respondent.

24 **WALLY MASTERS ELECTRICAL**
25 **SERVICE**
26 **1332 Milano Drive, Unit 7**
West Sacramento, California 95691
27 **WALTER LEONARD MASTERS, Owner**
28 **Contractor's License No. 931969, C10,**

1 LANNING REAL ESTATE AND
2 CONSTRUCTION
3 78365 Highway 111, #102
4 La Quinta, California 92253
5 MARK THOMAS LANNING, Owner
6 Contractor's License Number 956597, B,

7 and

8 CRANE HEATING & COOLING, INC.
9 17280 Applegate Road
10 Applegate, California 95703
11 Mailing Address:
12 P. O. Box 7436
13 Auburn, California 95604
14 JONATHAN CRAIG CRANE, RMO,
15 CEO/PRESIDENT
16 Contractor's License Number 995763, C20

17 Affiliated Parties.

18 Complainant alleges:

19 PARTIES

20 1. Wood Robinson ("Complainant") brings this First Amended Accusation and Petition
21 to Revoke Probation solely in his official capacity as the Enforcement Supervisor I of the
22 Contractors' State License Board ("Board"), Department of Consumer Affairs. This First
23 Amended Accusation replaces in its entirety the Accusation and Petition to Revoke Probation
24 filed on March 14, 2019.

25 **Royal D C Construction, Inc.**

26 2. On or about July 22, 2013, the Registrar of Contractors ("Registrar") issued
27 Contractor's License Number 985351 ("license"), classification B (general building contractor), to
28 Royal D C Construction, Inc. ("Respondent"); with Mario Alberto Diaz Martinez as the chief
executive officer/president and Leon Thomas as the responsible managing officer. On or about
February 27, 2018, Respondent filed with the Registrar or posted a \$15,000 disciplinary bond.
The following personnel were associated on the license as indicated below:

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Personnel/Classification	Date Associated	Date Disassociated
Leon Thomas, RMO B	07/22/2013	
Leon Thomas, RMO, B, C9	11/18/2013	10/09/2015
Mario Alberto Diaz Martinez, CEO/PRES.	07/22/2013	
Mario Alberto Diaz Martinez, RMO B	09/24/2018	
Mark Thomas Lanning, RMO B	03/25/2016	09/24/2018
Walter Leonard Masters, RMO, C10	12/14/2017	09/04/2018
Kenneth Allen Joseph Edwards, RMO C39	12/22/2017	
Jonathan Craig Crane, RMO C20	03/21/2018	08/24/2018
Jonathan Craig Crane, RMO, C20	12/19/2018	12/21/2018
Alfredo Ramos, RMO C35	06/19/2018	
Agustin Lopez Guerrero, RMO, A, C8	08/24/2018	09/07/2018
Alexander Nicholus Fuller, RMO, C10	12/19/2018	12/20/2018

The license was suspended on the dates indicated below and will expire on July 31, 2019, unless renewed.

<u>Suspension Date</u>	<u>Violation</u>	<u>Status</u>
10/01/2015	Business and Professions Code ("Code") section 7071.17 (Judgment #34-2014-00170179)	Suspension lifted 11/25/1015
10/02/1015	Code of Civil Procedure section 996.340 (Contractor's Bond)	Suspension lifted 03/18/2016
10/26/2015	Code section 7071.11 (Bond Payment of Claim #45497-1)	Suspension lifted 01/04/2016
01/07/2016	Code section 7068.2 (Lack of Qualifier)	License reinstated 03/25/2016
02/17/2016	Code section 7071.11 (Bond Payment of Claim #45497-1)	Suspension lifted 02/26/2016
08/17/2016	Code section 7071.11 (Bond Payment of Claim #45497-1)	License reinstated 09/02/2016
10/31/2016	Code section 7071.11 (2) (Bond Payment of of Claim #45497-1 & #45497-1)	License reinstated 11/14/2016
12/16/2016	Code section 7071.8 (Disciplinary Bond)	License reinstated 02/14/2017
05/02/2017	Code section 7071.11 (Bond Payment of Claim #45497-1)	Suspension lifted 05/05/2017
05/05/2017	Code section 7071.11 (Bond Payment of of Claim #45497-1)	License reinstated 05/06/2017

1	08/02/2017	Code section 7071.11 (2) (Bond Payment of Claims #45497-1 & #45497-1)	License reinstated 08/24/2017
2	10/09/2017	Code section 7071.11 (2) (Bond Payment of of Claims #45497-1 & #45497-1)	License reinstated 10/11/2017
3			
4	<u>Suspension Date</u>	<u>Violation</u>	<u>Status</u>
5	11/30/2018	Code section 7071.11 (2) (Bond Payment of Claims #45497-1 & #45497-1)	License reinstated 12/03/2018
6			
7	01/03/2019	Code section 7071.11 (2) (Bond Payment of Claims #45497-1 & #45497-1)	License reinstated 01/07/2019
8			

9 **Wally Masters Electrical Service**

10 3. On or about April 29, 2009, the Registrar issued Contractor's License Number
11 931969 ("license"), classification C10 (electrical), to Walter Leonard Masters, owner of Wally
12 Masters Electrical Service. On or about September 29, 2013, the license was suspended pursuant
13 to Welfare and Institutions Code section 17520 (Family Support). The license was reinstated on
14 November 6, 2013. On February 16, 2014, the license was suspended pursuant to Welfare and
15 Institutions Code section 17520 (Family Support). The license was reinstated on February 20,
16 2014. On May 22, 2014, the license was inactivated. On June 27, 2015, the license was
17 suspended pursuant to Welfare and Institutions Code section 17520 (Family Support). The
18 license was reinstated on June 30, 2015. On September 25, 2015, the license was reactivated. On
19 April 13, 2017, the license was suspended pursuant to Code section 7125.2 (Workers
20 Compensation). The license was reinstated on June 2, 2017. The license will expire on
21 September 30, 2019, unless renewed.

22 **Lanning Real Estate and Construction**

23 4. On or about January 12, 2011, the Registrar issued Contractor's License Number
24 956597 ("license"), classification B (general building contractor), to Mark Thomas Lanning,
25 owner of Lanning Real Estate and Construction. On April 11, 2011, the license was suspended
26 pursuant to Code of Civil Procedure section 996.340 (Contractor's Bond). The license was
27 reinstated on August 20, 2012. On July 14, 2018, the license was suspended pursuant to Code of
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1 Civil Procedure section 996.340 (Contractor's Bond). The license was reinstated on July 27,
2 2018. The license expired on January 31, 2019, and has not been renewed.

3 **Crane Heating & Cooling, Inc.**

4 5. On or about August 16, 2014, the Registrar issued Contractor's License Number
5 995763, classification C20 (warm air heating, ventilating and air-conditioning), to Jonathan Craig
6 Crane, owner of Crane Heating and Cooling. On May 25, 2016, the license was issued a C38
7 classification (refrigeration). On August 19, 2016, the license was reissued to Crane Heating &
8 Cooling, Inc. with Jonathan Craig Crane as the responsible managing officer and chief executive
9 officer/president. The license will expire on August 31, 2020, unless renewed.

10 **Royal D C Construction Inc. Disciplinary Information**

11 6. In a disciplinary action entitled "In the Matter of the Accusation Against Royal D C
12 Construction Inc.," Case No: N2014-254, the Registrar issued a Decision and Order effective
13 December 16, 2016, in which Respondent's license was revoked. However, the revocation was
14 stayed and Respondent's license was placed on probation for three (3) years with certain terms
15 and conditions, including that Respondent pay \$21,411.54 in restitution to C. S. and M. R. within
16 thirty days of the effective date of the Decision. Respondent was also ordered to file a
17 disciplinary bond or post a cash deposit of \$15,000 for a period of not less than three years
18 pursuant to Code section 7071.8. A copy of that Decision and Order is attached as Exhibit A and
19 is incorporated by reference.

20 **ACCUSATION**

21 **JURISDICTION**

22 7. Code section 7090 provides, in pertinent part, that the Registrar may suspend or
23 revoke any license if the licensee is guilty of or commits any one or more of the acts or omissions
24 constituting cause for disciplinary action.

25 8. Code section 7095 states, in pertinent part, that the Registrar in making his order may:

26 (a) Provide for the immediate complete suspension by the licensee of all operations as a
27 contractor during the period fixed by the decision;

1 (b) Permit the licensee to complete any or all contracts shown by competent evidence
2 taken at the hearing to be then uncompleted; and

3 (c) Impose upon the licensee compliance with such specific conditions as may be just in
4 connection with his operations as a contractor disclosed at the hearing, and may further provide
5 that until such conditions are complied with, no application for restoration of the suspended or
6 revoked license shall be accepted by the Registrar.

7 9. Code section 7096 states:

8 For the purposes of this chapter, the term "licensee" shall include an
9 individual, partnership, corporation, limited liability company, joint venture, or any
10 combination or organization licensed under this chapter, and shall also include any
11 named responsible managing officer, responsible managing manager, responsible
12 managing member, or personnel of that licentiate whose appearance has qualified the
13 licentiate under the provisions of Section 7068.

14 10. Code section 7097 states:

15 Notwithstanding the provisions of Sections 7121 and 7122, when any
16 license has been suspended by a decision of the registrar pursuant to an accusation or
17 pursuant to subdivision (b) of Section 7071.17, Section 7085.6 or 7090.1, any
18 additional license issued under this chapter [the Contractors' State License Law] in
19 the name of the licensee or for which the licensee furnished qualifying experience and
20 appearance under the provisions of Section 7068, may be suspended by the registrar
21 without further notice.

22 11. Code section 7098 states:

23 Notwithstanding the provisions of Sections 7121 and 7122, when any
24 license has been revoked under the provisions of this chapter [the Contractors' State
25 License Law], any additional license issued under this chapter in the name of the
26 licensee or for which the licensee furnished qualifying experience and appearance
27 under the provisions of Section 7068, may be revoked by the registrar without further
28 notice.

12. Code section 7106.5 states that the expiration, cancellation, forfeiture, revocation, or
suspension of a license by operation of law or by order or decision of the Registrar or a court of
law, or the voluntary surrender of a license by a licensee shall not deprive the Registrar of
jurisdiction to proceed with any investigation of or action or disciplinary proceeding against the
license, or to render a decision suspending or revoking the license.

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1 13. Code section 7121.5 states:

2 A person who was the qualifying individual on a revoked license, or of a
3 license under suspension, or of a license that was not renewed while it was under
4 suspension, shall be prohibited from serving as an officer, director, associate, partner,
5 manager, or qualifying individual of a licensee, whether or not the individual had
6 knowledge of or participated in the prohibited acts or omissions for which the license
7 person by a licensee shall constitute grounds for disciplinary action.

8 14. Code section 7122.5 states:

9 The performance by any individual, partnership, corporation, firm, or
10 association of any act or omission constituting a cause for disciplinary action,
11 likewise constitutes a cause for disciplinary action against any licensee who at the
12 time such act or omission occurred was the responsible managing employee,
13 qualifying partner, responsible managing officer, or qualifying member of such
14 individual, partnership, corporation, firm, or association, whether or not he had
15 knowledge of or participated in the prohibited act or omission.

11 STATUTORY PROVISIONS

12 15. Code section 7107 states:

13 "Abandonment without legal excuse of any construction project or operation engaged in
14 or undertaken by the licensee as a contractor constitutes a cause for disciplinary action."

15 16. Code section 7109, subdivision (a), states:

16 A willful departure in any material respect from accepted trade standards for
17 good and workmanlike construction constitutes a cause for disciplinary action,
18 unless the departure was in accordance with plans and specifications prepared by or
19 under the direct supervision of an architect.

20 17. Code section 7113 states that "[f]ailure in a material respect on the part of a licensee
21 to complete any construction project or operation for the price stated in the contract for such
22 construction project or operation or in any modification of such contract constitutes a cause for
23 disciplinary action."

24 18. Code section 7159.5 states, in part:

25 This section applies to all home improvement contracts, as defined in
26 Section 7151.2, between an owner or tenant and a contractor, whether a general
27 contractor or a specialty contractor, who is licensed or subject to be licensed
28 pursuant to this chapter with regard to the transaction.

(a) Failure by the licensee or a person subject to be licensed under this
chapter, or by his or her agent or salesperson to comply with the following provision
is cause for discipline:

1 (3) If a downpayment will be charged, the downpayment may not exceed
2 one thousand dollars (\$1,000) or 10 percent of the contract amount, whichever is
3 less.

4 (5) Except for a downpayment, the contractor may neither request nor
5 accept payment that exceeds the value of the work performed or material delivered.

6 COST RECOVERY/RESTITUTION

7 19. Code section 125.3 provides, in pertinent part, that the Registrar may request the
8 administrative law judge to direct a licentiate found to have committed a violation or violations of
9 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
10 enforcement of the case.

11 20. Government Code section 11519, subdivision (d), provides, in pertinent part, that the
12 Registrar may require restitution of damages suffered as a condition of probation in the event
13 probation is ordered.

14 LONGSPUR WAY PROJECT

15 21. On or about November 3, 2017, Respondent entered into a written home
16 improvement contract to replace the stucco, including the window trim, at N. P.'s residence
17 located on Longspur Way in Antelope, California, for \$19,000 ("Longspur Way project"). The
18 contract provided that the work would begin no later than five (5) business days from the issuance
19 of all relevant or necessary permits or engineering drawings.

20 22. On or about November 6, 2017, N. P. paid Respondent a down payment of \$19,000
21 on the contract from funds loaned to her through Ygrene Energy Fund.

22 23. On or about November 8, 2017, Respondent obtained a building permit and
23 commenced work on the project. In or about May 2018, N. P. terminated Respondent for failing
24 to complete the project in a timely manner. N. P. was also not satisfied with Respondent's
25 workmanship.

26 24. On or about March 29, 2018, N. P.'s daughter, A. B., filed a complaint against
27 Respondent with the Board.

28 25. On or about August 27, 2018, an industry expert retained by the Board inspected the
project and determined that Respondent's workmanship did not meet accepted trade standards for

1 good and workmanlike construction. The industry expert estimated that it would cost
2 approximately \$10,390 to correct the work.

3 **FIRST CAUSE FOR DISCIPLINE**

4 **(Departure from Trade Standards)**

5 26. Respondent is subject to disciplinary action pursuant to Code section 7109,
6 subdivision (a), in that on the Longspur Way project, Respondent willfully departed from
7 accepted trade standards for good and workmanlike construction in the following material
8 respects:

- 9 a. Respondent failed to detail the stucco cleanly at the windows, weep screed, and
10 attached cable.
- 11 b. Respondent failed to ensure that the stucco texture was consistent on the left garage
12 wall.
- 13 c. Respondent failed to trim all of the windows on the house.
- 14 d. Respondent failed to prepare the wood eaves and rafter tails properly for painting and
15 failed to completely cover all areas of the undersides of the eaves with paint.
- 16 e. Respondent failed to re-install the exterior lights and one doorbell button.
- 17 f. Respondent failed to re-install the downspouts.
- 18 g. Respondent failed to the replace the ridge cap at the top left lip of the garage roof.
- 19 h. Respondent failed to re-install the house numbers.

20 **SECOND CAUSE FOR DISCIPLINE**

21 **(Failure to Complete Project for Price Stated in Contract)**

22 27. Respondent is subject to disciplinary action pursuant to Code section 7113 in that
23 Respondent failed in certain material respects to complete the Longspur Way project for the
24 contract price, as set forth in paragraph 25 above, and N. P. will be required to spend a substantial
25 sum in excess of the contract price to complete the project in accordance with the contract.

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1 **THIRD CAUSE FOR DISCIPLINE**

2 **(Illegal Down Payment)**

3 28. Respondent is subject to disciplinary action pursuant to Code section 7159.5,
4 subdivision (a), in that Respondent failed to comply with subdivision (a)(3) of that section, as
5 follows: On or about November 6, 2017, Respondent requested and obtained \$19,000 from N. P.
6 as a down payment on the contract, an amount which exceeds \$1,000 or 10 percent of the contract
7 price, whichever is less.

8 **CHABLIS CIRCLE PROJECT**

9 29. On or about June 20, 2018, Respondent entered into a written home improvement
10 contract with M.M. to construct a home addition at his residence located on Chablis Circle, in
11 Roseville, California, for \$52,500 ("Chablis Circle project"). On or about July 3, 2018, a change
12 order was entered into for the installation of a bar in the new addition for \$6,000, making the total
13 contract price \$57,500. Work began on or about June 25, 2018, and ceased on December 10,
14 2018. Respondent received a total of \$50,708.29.

15 **FOURTH CAUSE FOR DISCIPLINE**

16 **(Abandonment)**

17 30. Respondent is subject to discipline pursuant to Code section 7107, in that on or about
18 December 10, 2018, it abandoned the Chablis Circle project without legal excuse, in that
19 Respondent failed to do the following:

- 20 a. Respondent failed to connect/stubout the bar sink plumbing to the existing plumbing.
21 b. Respondent failed to complete the main panel electrical wiring and interior wiring.
22 c. Respondent failed to install breakers.
23 d. Respondent failed to remove an electrical outlet located high on the wall to the left of
24 the enclosed chimney.
25 e. Respondent failed to provide and install the roof dual pack 1.5 ton unit.
26 f. Respondent failed to have HERS¹ testing performed.
27 g. Respondent failed to install the attic baffle and insulate the access hatch.

28 ¹ Home Energy Rating System

- 1 h. Respondent failed to install a French drain and connect the new downspouts and the
- 2 existing drains into the drainage system.
- 3 i. Respondent failed to haul away construction debris.
- 4 j. Respondent failed to pour a concrete slab/landing at the exterior door.
- 5 k. Respondent failed to install a barn door at the new addition entry.
- 6 l. Respondent failed to re-install an existing porch light.

7 **FIFTH CAUSE FOR DISCIPLINE**

8 **(Departure from Trade Standards)**

9 31. Respondent is subject to disciplinary action pursuant to Code section 7109,
10 subdivision (a), in that on the Chablis Circle project, Respondent willfully departed from accepted
11 trade standards for good and workmanlike construction in the following material respects:

- 12 a. Respondent failed to seal the new porch light to the stucco to prevent water intrusion.
- 13 b. Respondent failed to re-set the existing AC unit on a pad and level.
- 14 c. Respondent failed to install fuses for the quick disconnect at the AC unit.
- 15 d. Respondent failed to clean stucco spatter/overspray from the AC lines and the AC
- 16 unit.
- 17 e. Respondent failed to have the kinked AC lines inspected to determine if they needed
- 18 to be repaired or replaced.
- 19 f. Respondent failed to patch, tape, texture, and paint the access holes in the garage and
- 20 bathroom.
- 21 g. Respondent failed to repair the broken sprinkler head it damaged by running over it.
- 22 h. Respondent failed to use the proper color of caulking on the downspout.
- 23 i. Respondent failed to install leaf guard in gutters on the existing house.
- 24 j. Respondent failed to install flashing at the door frame/jamb and into the wall system
- 25 on the side and along the top to prevent water intrusion.
- 26 k. Respondent failed to remove nails and repair the damage it caused to the existing
- 27 magazine rack in the bathroom.
- 28 l. Respondent failed to apply the drywall texture in a consistent uniform manner.

- 1 m. Respondent failed to provide the correct spacing between wall outlets.
2 n. Respondent inserted a stud in the wall that does not align with the other studs in the
3 wall causing the drywall patch to bulge outward.
4 o. Respondent failed to install operational electrical outlets.
5 p. Respondent failed to re-attach the cables at the existing entry door.

6 **SIXTH CAUSE FOR DISCIPLINE**

7 **(Failure to Complete Project for Price Stated in Contract)**

8 32. Respondent is subject to disciplinary action pursuant to Code section 7113 in that
9 Respondent failed in certain material respects to complete the Chablis Circle project for the
10 contract price, as set forth in paragraph 29 above, and M.M. will be required to spend a
11 substantial sum in excess of the contract price to complete the project in accordance with the
12 contract.

13 **SEVENTH CAUSE FOR DISCIPLINE**

14 **(Payment Exceeds Value of Work Performed)**

15 33. Respondent is subject to discipline under Code section 7159.5, in that on the Chablis
16 Circle project, Respondent violated subdivision (a)(5) of that Code by requesting and receiving
17 payment totaling \$19,708.29, an amount that exceeded the value of work performed and/or
18 materials supplied.

19 **PETITION TO REVOKE PROBATION**

20 34. Complainant incorporates by reference as though fully set forth herein the allegations
21 contained in paragraphs 1 through 33 of the Accusation.

22 35. Condition 4 of Respondent's probation states, in pertinent part, that if Respondent
23 violates probation or any condition of probation in any respect, the Registrar, after giving notice
24 and opportunity to be heard, may revoke probation and impose the disciplinary order that is
25 stayed. If an accusation or petition to revoke probation is filed against Respondent during the
26 probationary period, then the Registrar shall have continuing jurisdiction of this matter until the
27 subsequent matter is final, and the period of probation and all the conditions of probation in this
28 matter shall be extended until the subsequent matter is final.

1 36. Grounds exist to revoke Respondent's probation and re-impose the order of
2 revocation of Respondent's contractor's license in that Respondent violated the conditions of its
3 probation as follows:

4 **FIRST CAUSE TO REVOKE PROBATION**

5 **(Failure to Obey All Laws)**

6 37. Condition 1 of Respondent's probation states that Respondent shall comply with all
7 federal, state, and local laws; including all building laws and uniform codes, governing the
8 activities of a licensed contractor in California.

9 38. Respondent's probation is subject to revocation in that Respondent failed to obey all
10 state governing Respondent's activities as a licensed contractor, as set forth in paragraphs 26 to
11 28 and 30 to 33 above.

12 **SECOND CAUSE TO REVOKE PROBATION**

13 **(Failure to Pay Cost Recovery)**

14 39. Condition 11 of Respondent's probation states that Respondent shall pay the
15 Registrar pursuant to Business and Professions Code section 125.3 the costs of investigation and
16 enforcement in this matter in the amount of \$6,000 within one year of the effective date of the
17 Decision and Order. Payments may be made in equal monthly installments of \$200 per month
18 beginning thirty (30) days from the effective date of the Decision and Order. There is no penalty
19 for pre-payment.

20 40. Respondent's probation is subject to revocation in that Respondent failed to make the
21 cost recovery payments as scheduled. The amount of \$1,200 is overdue.

22 **THIRD CAUSE TO REVOKE PROBATION**

23 **(Failure to Comply with Probation)**

24 41. Condition 4 of Respondent's probation states that if Respondent violates probation or
25 any condition of probation in any respect, the registrar, after giving notice and opportunity to be
26 heard, may revoke probation and impose the disciplinary order that is stayed. If an accusation or
27 petition to revoke probation is filed against Respondent during the probationary period, then the
28 Registrar shall have continuing jurisdiction of this matter until the subsequent matter is final, and

1 the period of probation and all the conditions of probation in this matter shall be extended until
2 the subsequent matter is final. If there is an order to make restitution or pay cost recovery and
3 Respondent fails to comply with the restitution or cost recovery order and make a payment, the
4 Registrar may immediately lift the stay and reimpose the disciplinary order WITHOUT giving
5 Respondent an opportunity to be heard.

6 42. Respondent's probation is subject to revocation in that Respondent violated
7 probation, as set forth above in paragraphs 37 to 40.

8 OTHER MATTERS

9 **Mario Alberto Diaz Martinez**

10 43. Pursuant to Code sections 7097 and 7098, if Contractor's License Number 985351,
11 issued to Royal D C Construction, Inc., is suspended or revoked, the Registrar may suspend or
12 revoke, without notice, any other license issued in the name of Mario Alberto Diaz Martinez or
13 for which Mario Alberto Diaz Martinez furnished the qualifying experience or appearance.

14 44. Pursuant to Code section 7121.5, if discipline is imposed on Contractor's License
15 Number 985351, issued to Royal D C Construction, Inc., Mario Alberto Diaz Martinez shall be
16 prohibited from serving as an officer, director, associate, partner, or qualifying individual for any
17 licensee during the time the discipline is imposed, whether or not he had knowledge of or
18 participated in the acts or omissions constituting grounds for discipline, and any licensee which
19 employs, elects or associates Mario Alberto Diaz Martinez shall be subject to disciplinary action.

20 **Kenneth Allen Joseph Edwards**

21 45. Pursuant to Code sections 7097 and 7098, if Contractor's License Number 985351,
22 issued to Royal D C Construction, Inc., is suspended or revoked, the Registrar may suspend or
23 revoke, without notice, any other license issued in the name of Kenneth Allen Joseph Edwards or
24 for which Kenneth Allen Joseph Edwards furnished the qualifying experience or appearance.

25 46. Pursuant to Code section 7121.5, if discipline is imposed on Contractor's License
26 Number 985351, issued to Royal D C Construction, Inc., Kenneth Allen Joseph Edwards shall be
27 prohibited from serving as an officer, director, associate, partner, or qualifying individual for any
28 licensee during the time the discipline is imposed, whether or not he had knowledge of or

1 participated in the acts or omissions constituting grounds for discipline, and any licensee which
2 employs, elects or associates Kenneth Allen Joseph Edwards shall be subject to disciplinary
3 action.

4 **Alfredo Ramos**

5 47. Alfredo Ramos was the RMO for Respondent in the C35 classification at the time of
6 the Longspur Way project and Chablis Circle project.

7 48. Pursuant to Code sections 7097 and 7098, if Contractor's License Number 985351,
8 issued to Royal D C Construction, Inc., is suspended or revoked, the Registrar may suspend or
9 revoke, without notice, any other license issued in the name of Alfredo Ramos or for which
10 Alfredo Ramos furnished the qualifying experience or appearance.

11 49. Pursuant to Code section 7121.5, if discipline is imposed on Contractor's License
12 Number 985351, issued to Royal D C Construction, Inc., Alfredo Ramos shall be prohibited from
13 serving as an officer, director, associate, partner, or qualifying individual for any licensee during
14 the time the discipline is imposed, whether or not he had knowledge of or participated in the acts
15 or omissions constituting grounds for discipline, and any licensee which employs, elects or
16 associates Alfredo Ramos shall be subject to disciplinary action.

17 **Walter Leonard Masters**

18 50. Walter Leonard Masters was the RMO for Respondent in the C10 classification at the
19 time of the Longspur Way project and Chablis Circle project.

20 51. Pursuant to Code sections 7097 and 7098, if Contractor's License Number 985351,
21 issued to Royal D C Construction Inc., is suspended or revoked, the Registrar may suspend or
22 revoke, without notice, Contractor's License Number 931969, issued to Walter Leonard Masters,
23 owner of Wally Masters Electrical Service. Further, the Registrar may suspend or revoke without
24 notice any other license issued in the name of Walter Leonard Masters or for which Walter
25 Leonard Masters furnished the qualifying experience or appearance.

26 52. Pursuant to Code section 7121.5, if discipline is imposed on Contractor's License
27 Number 985351, issued to Royal D C Construction Inc., Walter Leonard Masters shall be
28 prohibited from serving as an officer, director, associate, partner, or qualifying individual for any

1 licensee during the time the discipline is imposed, whether or not he had knowledge of or
2 participated in the acts or omissions constituting grounds for discipline, and any licensee which
3 employs, elects or associates Walter Leonard Masters shall be subject to disciplinary action.

4 53. Pursuant to Code section 7122.5, the causes for discipline established as to Royal D C
5 Construction Inc., constitute causes for discipline against Contractor's License Number 931969,
6 issued to Walter Leonard Masters, owner of Wally Masters Electrical Service, and any other
7 license issued to Walter Leonard Masters regardless of whether Walter Leonard Masters had
8 knowledge of or participated in the acts or omissions alleged above which constitute cause for
9 discipline against Royal D C Construction Inc.

10 **Mark Thomas Lanning**

11 54. Mark Thomas Lanning was the RMO for Respondent in the B classification at the
12 time of the Longspur Way project and Chablis Circle project.

13 55. Pursuant to Code sections 7097 and 7098, if Contractor's License Number 985351,
14 issued to Royal D C Construction Inc., is suspended or revoked, the Registrar may suspend or
15 revoke, without notice, Contractor's License Number 956597, issued to Mark Thomas Lanning,
16 owner of Lanning Real Estate and Construction. Further, the Registrar may suspend or revoke
17 without notice any other license issued in the name of Mark Thomas Lanning or for which Mark
18 Thomas Lanning furnished the qualifying experience or appearance.

19 56. Pursuant to Code section 7121.5, if discipline is imposed on Contractor's License
20 Number 985351, issued to Royal D C Construction Inc., Mark Thomas Lanning shall be
21 prohibited from serving as an officer, director, associate, partner, or qualifying individual for any
22 licensee during the time the discipline is imposed, whether or not he had knowledge of or
23 participated in the acts or omissions constituting grounds for discipline, and any licensee which
24 employs, elects or associates Mark Thomas Lanning shall be subject to disciplinary action.

25 57. Pursuant to Code section 7122.5, the causes for discipline established as to Royal D C
26 Construction Inc., constitute causes for discipline against Contractor's License Number 956597,
27 issued to Mark Thomas Lanning, owner of Lanning Real Estate and Construction, and any other
28 license issued to Mark Thomas Lanning regardless of whether Mark Thomas Lanning had

1 knowledge of or participated in the acts or omissions alleged above which constitute cause for
2 discipline against Royal D C Construction Inc.

3 **Jonathan Craig Crane**

4 58. Jonathan Craig Crane was the RMO for Respondent in the C20 classification at the
5 time of the Longspur Way project and Chablis Circle project.

6 59. Pursuant to Code sections 7097 and 7098, if Contractor's License Number 985351,
7 issued to Royal D C Construction Inc., is suspended or revoked, the Registrar may suspend or
8 revoke, without notice, Contractor's License Number 995763, issued to Crane Heating & Cooling,
9 Inc. Further, the Registrar may suspend or revoke without notice any other license issued in the
10 name of Jonathan Craig Crane or for which Jonathan Craig Crane furnished the qualifying
11 experience or appearance.

12 60. Pursuant to Code section 7121.5, if discipline is imposed on Contractor's License
13 Number 985351, issued to Royal D C Construction Inc., Jonathan Craig Crane shall be prohibited
14 from serving as an officer, director, associate, partner, or qualifying individual for any licensee
15 during the time the discipline is imposed, whether or not he had knowledge of or participated in
16 the acts or omissions constituting grounds for discipline, and any licensee which employs, elects
17 or associates Jonathan Craig Crane shall be subject to disciplinary action.

18 **PRAYER**

19 **WHEREFORE**, Complainant requests that a hearing be held on the matters herein alleged,
20 and that following the hearing, the Registrar of Contractors issue a decision:

21 1. Revoking probation and re-imposing the order of revocation of Contractor's License
22 Number 985351, issued to Royal D C Construction Inc.;

23 2. Revoking or suspending Contractor's License Number 985351, issued to Royal D C
24 Construction Inc.;

25 3. Prohibiting Mario Alberto Diaz Martinez from serving as an officer, director,
26 associate, partner, or qualifying individual of any licensee during the period that discipline is
27 imposed on Contractor's License Number 985351, issued to Royal D C Construction Inc.;

1 4. Revoking or suspending any other license for which Mario Alberto Diaz Martinez is
2 furnishing the qualifying experience or appearance;

3 5. Prohibiting Kenneth Allen Joseph Edwards from serving as an officer, director,
4 associate, partner, or qualifying individual of any licensee during the period that discipline is
5 imposed on Contractor's License Number 985351, issued to Royal D C Construction Inc.;

6 6. Revoking or suspending any other license for which Kenneth Allen Joseph Edwards
7 is furnishing the qualifying experience or appearance;

8 7. Prohibiting Alfredo Ramos from serving as an officer, director, associate, partner, or
9 qualifying individual of any licensee during the period that discipline is imposed on Contractor's
10 License Number 985351, issued to Royal D C Construction Inc.;

11 8. Revoking or suspending any other license for which Alfredo Ramos is furnishing the
12 qualifying experience or appearance;

13 9. Revoking or suspending Contractor's License Number 931969, issued to Walter
14 Leonard Masters, owner of Wally Masters Electrical Service;

15 10. Prohibiting Walter Leonard Masters from serving as an officer, director, associate,
16 partner, or qualifying individual of any licensee during the period that discipline is imposed on
17 Contractor's License Number 985351, issued to Royal D C Construction Inc.;

18 11. Revoking or suspending any other license for which Walter Leonard Masters is
19 furnishing the qualifying experience or appearance;

20 12. Revoking or suspending Contractor's License Number 956597, issued to Mark
21 Thomas Lanning, owner of Lanning Real Estate and Construction;

22 13. Prohibiting Mark Thomas Lanning from serving as an officer, director, associate,
23 partner, or qualifying individual of any licensee during the period that discipline is imposed on
24 Contractor's License Number 985351, issued to Royal D C Construction Inc.;

25 14. Revoking or suspending any other license for which Mark Thomas Lanning is
26 furnishing the qualifying experience or appearance;

27 15. Revoking or suspending Contractor's License Number 995763, issued to Crane
28 Heating & Cooling;

1 16. Prohibiting Jonathan Craig Crane from serving as an officer, director, associate,
2 partner, or qualifying individual of any licensee during the period that discipline is imposed on
3 Contractor's License Number 985351, issued to Royal D C Construction Inc.;

4 17. Revoking or suspending any other license for which Jonathan Craig Crane is
5 furnishing the qualifying experience or appearance;

6 18. Ordering restitution of all damages according to proof suffered by N. P. and M.M. as
7 a condition of probation in the event probation is ordered;

8 19. Ordering restitution of all damages suffered by N. P. and M.M. as a result of Royal D
9 C Construction Inc.'s conduct as a contractor, as a condition of restoration of Contractor's
10 License Number 985351, issued to Royal D C Construction Inc.;

11 20. Ordering Royal D C Construction Inc. to pay the Registrar of Contractors his costs in
12 the investigation and enforcement of the case according to proof at the hearing, pursuant to
13 Business and Professions Code section 125.3;

14 21. Ordering Royal D C Construction Inc. to provide the Registrar with a listing of all
15 contracting projects in progress and the anticipated completion date of each; and

16 22. Taking such other and further action as deemed necessary and proper.

17
18 DATED: 6/12/19



WOOD ROBINSON
Enforcement Supervisor I
Contractors' State License Board
Department of Consumer Affairs
State of California
Complainant *WR*

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21 JUN 12 2019
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