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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 Accusation Against:

Case No. N2012-438

14 **SIERRA SPRAY FOAM (CAROL MAE**
15 **STEPPS, QP; BOBBY FRANCIS STEPPS,**
16 **GP; BOBBIE CHARLES STEPPS, GP)**
17 **11750 Borden Road**
18 **Herald, CA 95648**

A C C U S A T I O N

19 **Contractor's License No. 638406, C-39**

Respondent,

20 **PACIFIC POLYMERS INC., DBA**
21 **AMERICAN FOAM EXPERTS (CAROL**
22 **MAE STEPPS, RMO; BOBBY JAMES**
23 **STEPPS, CEO/PRES.)**

24 **7550 Avila Dr.**
25 **Sparks, NV 89436**

26 **Mailing Address:**

27 **PO Box 50128**
28 **Sparks, NV 89435**

Contractors License No. 969486, C-33, C-39,

Affiliated License,

29 **SIERRA SPRAY FOAM ROOFING INC.**
30 **(BOBBY FRANCIS STEPPS, RMO)**

31 **11779 Borden Road**
32 **Herald, CA 95638**

33 **Mailing Address:**

34 **PO Box 190**
35 **Herald, CA 95638**

36 **Contractors License No. 468619, C-33, C-39,**

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Affiliated License,
SIERRA FOAM SYSTEMS INC. (BOBBY FRANCIS STEPPS, RMO; ROBYN AMELIA STEPPS, OFFICER)
11779 Borden Road
Herald, CA 95638
Mailing Address:
PO Box 489
Herald, CA 95638
Contractors License No. 788342, C-33,
Affiliated License,
SIERRA SPECIALTY COATINGS INC. (BOBBY FRANCIS STEPPS, RMO; ROBYN AMELIA STEPPS, OFFICER)
11779 Borden Road
Herald, CA 95638
Contractors License No. 945446, C-33,
Affiliated License.

Complainant alleges:

PARTIES

1. Wood Robinson (Complainant) brings this Accusation solely in his official capacity as the Enforcement Supervisor I of the Contractors' State License Board, Department of Consumer Affairs.
2. On or about February 24, 1992, the Registrar of Contractors issued Contractor's License Number 638406, C-39 to Sierra Spray Foam (Carol Mae Stepps, QP; Bobby Francis Stepps, GP; Bobbie Charles Stepps, GP) (Respondent Sierra). The Contractor's License expired under suspension on February 28, 2010, and was canceled on January 26, 2012. All personnel disassociated from the license on January 1, 2012.
3. On or about January 24, 2012, the Registrar of Contractors issued Contractor's License Number 969486, C-33, C-39 to Pacific Polymers Inc., d.b.a. American Foam Experts (Carol Mae Stepps, RMO; Bobby James Stepps, CEO/Pres.) (Affiliated License Pacific Polymers). The Contractor's License will expire on January 31, 2014, unless renewed.

1 **THIRD CAUSE FOR DISCIPLINE**

2 **(Departure from Trade Standards)**

3 23. Respondent Sierra is subject to disciplinary action under section 7109(a) of the Code
4 in that Respondent Sierra departed from accepted trade standards in two respects:

5 24. First, the two-part spray foam did not get mixed enough at the nozzle, causing the
6 roof to delaminate and crack; and

7 25. Second, the transition between the composition shingle roof and the spray foam roof
8 did not have flashing.

9 **OTHER MATTERS**

10 26. Pursuant to sections 7097 and 7098 of the Code, if license number 638406, C-39
11 issued to Respondent Sierra is suspended or revoked, the Registrar may suspend or revoke,
12 without notice, any other license issued in the name of Carol Mae Stepps or for which Carol Mae
13 Stepps furnished the qualifying experience and appearance, including license number 969486, C-
14 33, C-39 issued to Affiliated License Pacific Polymers.

15 27. Pursuant to Section 7121.5 of the Code, if discipline is imposed on license number
16 638406, C-39 issued to Respondent Sierra, Carol Mae Stepps shall be prohibited from serving as
17 an officer, director, associate, partner, manager, or qualifying individual of any licensee during the
18 time the discipline is imposed, whether or not she had knowledge or participated in the acts or
19 omissions constituting grounds for discipline, and any licensee which employs, elects, or
20 associates Carol Mae Stepps shall be subject to disciplinary action.

21 28. Bobby Francis Stepps, while serving as an officer of Respondent Sierra, had
22 knowledge of or participated in the acts or omissions which constitute cause for discipline against
23 Respondent Sierra.

24 29. Pursuant to section 7121 of the Code, if discipline is imposed on license number
25 638406, C-39 issued to Respondent Sierra, Bobby Francis Stepps shall be prohibited from serving
26 as an officer, director, associate, partner, manager, or qualifying individual, or member of the
27 personnel of record of any licensee during the time the discipline is imposed, and any licensee
28 which employs, elects, or associates Bobby Francis Stepps shall be subject to disciplinary action.

1 4. Revoking or suspending any other license for which Bobby Francis Stepps furnished
2 the qualifying experience or appearance, including License Number 468619, C-33, C-39 issued to
3 Sierra Spray Foam Roofing Inc. (Bobby Francis Stepps, RMO), License Number 788342, C-33
4 issued to Sierra Foam Systems Inc. (Bobby Francis Stepps, RMO; Robyn Amelia Stepps,
5 Officer), and License Number 945446, C-33 issued to Sierra Specialty Coatings Inc. (Bobby
6 Francis Stepps, RMO; Robyn Amelia Stepps, Officer);

7 5. Prohibiting Bobby Francis Stepps from serving as an officer, director, associate,
8 partner, or qualifying individual of any licensee during the period that discipline is imposed on
9 License Number 638406, C-39 issued to Sierra Spray Foam (Carol Mae Stepps, QP; Bobby
10 Francis Stepps, GP; Bobbie Charles Stepps, GP);

11 6. Ordering restitution of all damages suffered by KC and BC according to proof as a
12 condition of probation in the event probation is ordered for License Number 638406, C-39 issued
13 to Sierra Spray Foam (Carol Mae Stepps, QP; Bobby Francis Stepps, GP; Bobbie Charles Stepps,
14 GP);

15 7. Ordering restitution of all damages suffered by KC and BC according to proof as a
16 condition of restoration of License Number 638406, C-39 issued to Sierra Spray Foam (Carol
17 Mae Stepps, QP; Bobby Francis Stepps, GP; Bobbie Charles Stepps, GP);

18 8. Ordering Sierra Spray Foam (Carol Mae Stepps, QP; Bobby Francis Stepps, GP;
19 Bobbie Charles Stepps, GP) to pay the Registrar of Contractors his costs in the investigation and
20 enforcement of the case according to proof at the hearing, pursuant to Business and Professions
21 Code section 125.3;

22 9. Ordering Sierra Spray Foam (Carol Mae Stepps, QP; Bobby Francis Stepps, GP;
23 Bobbie Charles Stepps, GP) to provide the Registrar with a listing of all contracting projects in
24 progress and the anticipated completion date of each;

25 10. Ordering Pacific Polymers Inc., d.b.a. American Foam Experts (Carol Mae Stepps,
26 RMO; Bobby James Stepps, CEO/Pres.) to provide the Registrar with a listing of all contracting
27 projects in progress and the anticipated completion date of each;

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1 11. Ordering Sierra Spray Foam Roofing Inc. (Bobby Francis Stepps, RMO) to provide
2 the Registrar with a listing of all contracting projects in progress and the anticipated completion
3 date of each;

4 12. Ordering Sierra Foam Systems Inc. (Bobby Francis Stepps, RMO) to provide the
5 Registrar with a listing of all contracting projects in progress and the anticipated completion date
6 of each;

7 13. Ordering Sierra Specialty Coatings Inc. (Bobby Francis Stepps, RMO) to provide the
8 Registrar with a listing of all contracting projects in progress and the anticipated completion date
9 of each;

10 14. Taking such other and further action as deemed necessary and proper.

11 DATED: November 8, 2013 Heather Henderson

12 for WOOD ROBINSON
13 Enforcement Supervisor I
14 Contractors' State License Board
15 Department of Consumer Affairs
16 State of California
17 *Complainant*

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