

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

In the matter of the Accusation)
Against:) SOUTHERN REGION
)
J R CONSTRUCTION) CASE NO. S94-102
P.O. Box 22)
Lakewood, California 90714)
License No. 521167, B)
John Robert Watkins, Owner) ORDER TO ADOPT
) STIPULATION IN
) SETTLEMENT AND
) DECISION
Respondent(s).)

The attached Stipulation in Settlement and Decision as referenced in the above captioned Case No. S94-102, is hereby adopted.

IT IS FURTHER ORDERED that pursuant to Section 7102 of the Business and Professions Code and Section 870 of Title 16 of the California Code of Regulations, respondent J R Construction, License No 521167, shall not apply for reissuance or reinstatement of said license for 1 year(s) from the effective date of this decision.

This Order shall become effective on the 29th day of March, 1996.

IT IS SO ORDERED this 29th day of March, 1996.

GAIL W. JESSWEIN
Registrar of Contractors
Contractors State License Board
State of California

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1 DANIEL E. LUNGREN, Attorney General
 of the State of California
 2 LESLIE B. FLEMING,
 Deputy Attorney General, State Bar No. 68892
 3 Department of Justice
 110 West A Street, Suite 1100
 4 Post Office Box 85266
 San Diego, California 92186-5266
 5 Telephone: (619) 645-2065
 6 Attorneys for Complainant

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

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In the Matter of the Accusation)	NO. S-94-102
Against:)	
)	
J. R. CONSTRUCTION)	<u>STIPULATION IN</u>
Post Office Box 22)	<u>SETTLEMENT AND DECISION</u>
Lakewood, California 90714)	
License No. 521167, B)	
JOHN ROBERT WATKINS, Owner)	
)	
Respondent.)	

Paige B. Roush, Assistant Southern Regional Deputy of
 the Contractors' State License Board for the State of California,
 (hereinafter "Board") by and through her attorney, Daniel E.
 Lungren, Attorney General of the State of California, by Leslie
 B. Fleming, Deputy Attorney General, and J.R. Construction with
 John Robert Watkins as its Owner (hereinafter collectively
 referred to as "Respondent"), by and through his attorney Robert
 M. Orr, Esq., hereby stipulate as follows:

1. The Registrar of Contractors, Contractors' State
 License Board, Department of Consumer Affairs (hereinafter
 "Registrar") acquired jurisdiction over respondent by reason of

1 the following:

2 A. Respondent was duly served with a copy of
3 Accusation No. S-94-102, Statement to Respondent, Request for
4 Discovery, Form Notice of Defense and copies of Government Code
5 sections 11507.5, 11507.6 and 11507.7 as required by section
6 11503 and 11505, and respondent timely filed a Notice of Defense
7 within the time allowed by section 11506 of the Code.

8 B. Respondent has received and read Accusation
9 No. S-94-102, which is presently on file and pending before the
10 Board, a copy of which is attached as Exhibit A and incorporated
11 by reference. Respondent understands the nature of the charges
12 alleged in the Accusation and that the charges and allegations
13 constitute cause for imposing discipline upon respondent's
14 license to practice as a general contractor.

15 2. Respondent and his counsel are aware of each of
16 respondent's rights, including the right to a hearing on the
17 charges and allegations, the right to confront and cross-examine
18 witnesses who would testify against respondent, the right to
19 present evidence in his favor and call witnesses on his behalf,
20 or to testify, his right to contest the charges and allegations,
21 his right to reconsideration, appeal and all other rights which
22 are accorded him pursuant to the California Business and
23 Professions Code and Government Code.

24 3. Respondent freely and voluntarily waives each and
25 every one of the rights set forth in paragraph 2.

26 4. Respondent understands that in signing this
27 Stipulation rather than contesting the Accusation, he is enabling
28 the Registrar of Contractors, Contractors' State License Board of

1 the State of California to issue its order revoking his
2 contractor's license(s) without further legal process.

3 5. Respondent understands that in signing this
4 Stipulation, Contractor's License Number 521167 will be revoked
5 and any other license issued in the name John Robert Watkins or
6 for which John Robert Watkins furnished the qualifying experience
7 or appearance, shall also be revoked by the Registrar pursuant to
8 Business and Professions Code section 7097, as referenced in the
9 Accusation at paragraph 10.

10 6. Respondent further understands that in signing this
11 Stipulation, John Robert Watkins shall be prohibited from serving
12 as an officer, director, associate, partner, or qualifying
13 individual of any licensee during the time the license is
14 revoked, and any licensee which employs, elects, or associates
15 with John Robert Watkins shall be subject to disciplinary action,
16 pursuant to Business and Professions Code section 7121.5, as
17 referenced in the Accusation at paragraph 11.

18 7. Respondent admits the truth of the charges and
19 allegations contained in Accusation No. S-94-102.

20 Admissions made by respondent herein are for purposes
21 of this proceeding, for any other disciplinary proceedings by the
22 Board, and for any petition for reinstatement, reduction of
23 penalty, or application for relicensure, and shall have no force
24 or effect in any other case or proceeding.

25 8. Respondent fully understands that if this
26 Stipulation is adopted, under Business and Professions Code
27 section 7102, the Registrar will set the minimum time for
28 reapplication or reinstatement of respondent's license.

1 Respondent further understands that while the minimum statutory
2 period is one year from the effective date of the Decision, the
3 Registrar has the authority to extend the minimum time from the
4 one-year period to a maximum of five years.

5 9. Respondent fully understands that if he seeks
6 reinstatement of his license or applies for a new license, he
7 must comply with and meet all of the Board's licensing
8 requirements.

9 10. Upon acceptance of the Stipulation by the Board,
10 Respondent agrees to surrender and cause to be delivered to the
11 Board both his license and wallet certificate. Respondent
12 further understands that when the Board revokes his license, he
13 will no longer be permitted to practice as a general contractor
14 in California.

15 11. It is understood by Respondent that, in deciding
16 whether to adopt this stipulation, the Registrar may receive oral
17 and written communications from its staff and the Attorney
18 General's office. Communications pursuant to this paragraph
19 shall not disqualify the Registrar or other persons from future
20 participation in this or any other matter affecting respondent.
21 In the event this settlement is not adopted by the Registrar, the
22 stipulation will not become effective and may not be used for any
23 purpose, except for this paragraph, which shall remain in effect.

24 12. Based upon the foregoing, it is stipulated and
25 agreed that the Registrar may issue the following as its Decision
26 in this case:

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ORDER

IT IS HEREBY ORDERED that General B Contractor's License Number 521167 issued to J. R. Construction, John Robert Watkins, Owner, is revoked.

IT IS FURTHER ORDERED that any other license issued in the name John Robert Watkins or for which John Robert Watkins furnished the qualifying experience or appearance, shall be revoked.

IT IS FURTHER ORDERED that John Robert Watkins shall be prohibited from serving as an officer, director, associate, partner, or qualifying individual of any licensee during the time License Number 521167 is revoked.

IT IS FURTHER ORDERED that John Robert Wakins shall deliver his license and wallet certificate to the Contractors' State License Board.

IT IS FURTHER ORDERED that the earliest date John Robert Watkins can reapply for relicensure with the Contractors' State License Board is _____.

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I concur in the Stipulation and Order.

DATED: March 1, 1996

DANIEL E. LUNGREN, Attorney General
of the State of California

Leslie B. Fleming
Deputy Attorney General

8

Attorneys for Complainant

DATED: Feb. 27, 1996

Robert M. Orr
Attorney for Respondent

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ACKNOWLEDGEMENT

I have carefully read and fully understand the Stipulation and Order set forth above. I have discussed the terms and conditions set forth in the Stipulation and Order with my attorney, Robert M. Orr, Esq., and enter into it freely on advice of counsel, and with full knowledge of its force and effect. I understand that in signing this Stipulation, I am waiving my right to a hearing on the charges set forth in the Accusation on file in this matter. I further understand that in signing this Stipulation, that upon its formal acceptance by the Registrar, the Registrar shall enter the foregoing order revoking my right to practice as a contractor in the State of California.

DATED: 2-27-96

J. R. CONSTRUCTION
JOHN ROBERT WATKINS, Owner
Respondent

1 DANIEL E. LUNGREN, Attorney General
of the State of California
2 LESLIE B. FLEMING,
Deputy Attorney General, State Bar No. 68892
3 Department of Justice
110 West A Street, Suite 1100
4 Post Office Box 85266
San Diego, California 92186-5266
5 Telephone: (619) 645-2065
6 Attorneys for Complainant

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

11 In the Matter of the Accusation) NO. S-94-102
12 Against:)
13 J. R. CONSTRUCTION) STIPULATION IN
Post Office Box 22) SETTLEMENT AND DECISION
14 Lakewood, California 90714)
License No. 521167, B)
15 JOHN ROBERT WATKINS, Owner)
16 Respondent.)

17
18 Paige B. Roush, Assistant Southern Regional Deputy of
19 the Contractors' State License Board for the State of California,
20 (hereinafter "Board") by and through her attorney, Daniel E.
21 Lungren, Attorney General of the State of California, by Leslie
22 B. Fleming, Deputy Attorney General, and J.R. Construction with
23 John Robert Watkins as its Owner (hereinafter collectively
24 referred to as "Respondent"), by and through his attorney Robert
25 M. Orr, Esq., hereby stipulate as follows:

26 1. The Registrar of Contractors, Contractors' State
27 License Board, Department of Consumer Affairs (hereinafter
28 "Registrar") acquired jurisdiction over respondent by reason of

1 the following:

2 A. Respondent was duly served with a copy of
3 Accusation No. S-94-102, Statement to Respondent, Request for
4 Discovery, Form Notice of Defense and copies of Government Code
5 sections 11507.5, 11507.6 and 11507.7 as required by section
6 11503 and 11505, and respondent timely filed a Notice of Defense
7 within the time allowed by section 11506 of the Code.

8 B. Respondent has received and read Accusation
9 No. S-94-102, which is presently on file and pending before the
10 Board, a copy of which is attached as Exhibit A and incorporated
11 by reference. Respondent understands the nature of the charges
12 alleged in the Accusation and that the charges and allegations
13 constitute cause for imposing discipline upon respondent's
14 license to practice as a general contractor.

15 2. Respondent and his counsel are aware of each of
16 respondent's rights, including the right to a hearing on the
17 charges and allegations, the right to confront and cross-examine
18 witnesses who would testify against respondent, the right to
19 present evidence in his favor and call witnesses on his behalf,
20 or to testify, his right to contest the charges and allegations,
21 his right to reconsideration, appeal and all other rights which
22 are accorded him pursuant to the California Business and
23 Professions Code and Government Code.

24 3. Respondent freely and voluntarily waives each and
25 every one of the rights set forth in paragraph 2.

26 4. Respondent understands that in signing this
27 Stipulation rather than contesting the Accusation, he is enabling
28 the Registrar of Contractors, Contractors' State License Board of

1 the State of California to issue its order revoking his
2 contractor's license(s) without further legal process.

3 5. Respondent understands that in signing this
4 Stipulation, Contractor's License Number 521167 will be revoked
5 and any other license issued in the name John Robert Watkins or
6 for which John Robert Watkins furnished the qualifying experience
7 or appearance, shall also be revoked by the Registrar pursuant to
8 Business and Professions Code section 7097, as referenced in the
9 Accusation at paragraph 10.

10 6. Respondent further understands that in signing this
11 Stipulation, John Robert Watkins shall be prohibited from serving
12 as an officer, director, associate, partner, or qualifying
13 individual of any licensee during the time the license is
14 revoked, and any licensee which employs, elects, or associates
15 with John Robert Watkins shall be subject to disciplinary action,
16 pursuant to Business and Professions Code section 7121.5, as
17 referenced in the Accusation at paragraph 11.

18 7. Respondent admits the truth of the charges and
19 allegations contained in Accusation No. S-94-102.

20 Admissions made by respondent herein are for purposes
21 of this proceeding, for any other disciplinary proceedings by the
22 Board, and for any petition for reinstatement, reduction of
23 penalty, or application for relicensure, and shall have no force
24 or effect in any other case or proceeding.

25 8. Respondent fully understands that if this
26 Stipulation is adopted, under Business and Professions Code
27 section 7102, the Registrar will set the minimum time for
28 reapplication or reinstatement of respondent's license.

1 Respondent further understands that while the minimum statutory
2 period is one year from the effective date of the Decision, the
3 Registrar has the authority to extend the minimum time from the
4 one-year period to a maximum of five years.

5 9. Respondent fully understands that if he seeks
6 reinstatement of his license or applies for a new license, he
7 must comply with and meet all of the Board's licensing
8 requirements.

9 10. Upon acceptance of the Stipulation by the Board,
10 Respondent agrees to surrender and cause to be delivered to the
11 Board both his license and wallet certificate. Respondent
12 further understands that when the Board revokes his license, he
13 will no longer be permitted to practice as a general contractor
14 in California.

15 11. It is understood by Respondent that, in deciding
16 whether to adopt this stipulation, the Registrar may receive oral
17 and written communications from its staff and the Attorney
18 General's office. Communications pursuant to this paragraph
19 shall not disqualify the Registrar or other persons from future
20 participation in this or any other matter affecting respondent.
21 In the event this settlement is not adopted by the Registrar, the
22 stipulation will not become effective and may not be used for any
23 purpose, except for this paragraph, which shall remain in effect.

24 12. Based upon the foregoing, it is stipulated and
25 agreed that the Registrar may issue the following as its Decision
26 in this case:

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ORDER

IT IS HEREBY ORDERED that General B Contractor's License Number 521167 issued to J. R. Construction, John Robert Watkins, Owner, is revoked.

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IT IS FURTHER ORDERED that John Robert Watkins shall be prohibited from serving as an officer, director, associate, partner, or qualifying individual of any licensee during the time License Number 521167 is revoked.

IT IS FURTHER ORDERED that John Robert Wakens shall deliver his license and wallet certificate to the Contractors' State License Board.

IT IS FURTHER ORDERED that the earliest date John Robert Watkins can reapply for relicensure with the Contractors' State License Board is _____.

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I concur in the Stipulation and Order.

DATED: March 1, 1996

DANIEL E. LUNGREN, Attorney General
of the State of California

Leslie B. Fleming *J*
Deputy Attorney General
Attorneys for Complainant

DATED: Feb. 27, 1996

Robert M. Orr
Attorney for Respondent

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DATED: 2-27-96

J. R. CONSTRUCTION
JOHN ROBERT WATKINS, Owner
Respondent

EXHIBIT A

1 DANIEL E. LUNGREN, Attorney General
of the State of California
2 LESLIE B. FLEMING, State Bar No. 68892
Deputy Attorney General
3 110 West A Street, Suite 1100
P. O. Box 85266
4 San Diego, California 92186-5266
Telephone: (619) 645-2065
5 Attorneys for Complainant
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9 BEFORE THE
REGISTRAR OF CONTRACTORS
10 CONTRACTORS' STATE LICENSE BOARD
DEPARTMENT OF CONSUMER AFFAIRS
11 STATE OF CALIFORNIA
12

13 In the Matter of the Accusation) NO. S-94-102
Against:)
14)
J. R. CONSTRUCTION) ACCUSATION
15 Post Office Box 22)
Lakewood, California 90714)
16 License No. 521167, B)
JOHN ROBERT WATKINS, Owner)
17)
Respondent.)
18)

19 Paige B. Roush, for causes for discipline, alleges:
20

21 1. Complainant Paige B. Roush makes and files this
22 accusation in her official capacity as Regional Deputy,
23 Contractors' State License Board, Department of Consumer Affairs.
24

25 2. On November 20, 1987, the Registrar of Contractors
26 issued license number 521167, classification B (general building
27 contractor), to J. R. Construction, with John Robert Watkins,

1 owner (hereinafter referred to as respondent). The license was
2 in full force and effect at all times pertinent herein and has
3 been renewed through November 30, 1995.

4
5 3. Under Business and Professions Code section 7090,
6 the Registrar of Contractors may suspend or revoke any license
7 when he finds that the holder, while a licensee or applicant, has
8 committed any acts or omissions constituting cause for
9 discipline.

10 Under Business and Professions Code section 7106.5, the
11 expiration or suspension of a license by operation of law, or by
12 order or decision of the Registrar of Contractors, or a court of
13 law, or the voluntary surrender of the license shall not deprive
14 the Registrar of jurisdiction to proceed with disciplinary
15 action.

16 Under Business and Professions Code section 125.3, the
17 Registrar of Contractors may request the administrative law judge
18 to direct a licentiate found to have committed a violation or
19 violations of the licensing act to pay a sum not to exceed the
20 reasonable costs of the investigation and enforcement of the
21 case.

22
23 **COMFORT PROJECT**

24 4. On January 9, 1992, respondent entered into a
25 written agreement with Michael Comfort to add to and remodel the
26 existing Comfort residence at Los
27 Alamitos, California, for \$113,000. Work commenced on or about

1 January 1992 and ceased on or about October 1992. Michael and
2 Diane Comfort paid \$114,993.80 to or on behalf of respondent.

3

4 5. Respondent has subjected its license to discipline
5 under Business and Professions Code section 7109(a) in that on
6 the Comfort project respondent willfully departed from accepted
7 trade standards for good and workmanlike construction in the
8 following material respects:

9 a. Failed to install footings under bearing wall at
10 the east wall of the den.

11 b. Installed steel mesh below the concrete slab
12 rather than in the middle.

13 c. Failed to pour concrete slab for the front porch
14 area at a level which would accommodate pavers and provide an
15 adequate distance between the surface and the entry threshold.

16 d. Failed to replace warped threshold at the front
17 door.

18 e. Failed to pour concrete slab for the front porch
19 area a minimum of two inches below the weep screed.

20 f. Failed to construct the west wall of the den at
21 the gable ends with full-height studs.

22 g. Failed to construct the den roof and ceiling which
23 would not sag and/or deflect.

24 h. Failed to install adequate roof rafter/ceiling
25 joists to carry the weight of the plaster and three truss beams.

26 i. Failed to install purlins in the attic space.

27 j. Failed to install 2x4 braces in the attic space.

- 1 k. Failed to install rafter ties where the rafters
2 run perpendicular to the ceiling joists.
- 3 l. Failed to install blocking at the bearing wall
4 where the rafters and the ceiling joists run parallel.
- 5 m. Installed a header beam consisting of two pieces
6 of lumber between the west wall of the kitchen corner and a pre-
7 existing wall and failed to properly join the beam-to-beam
8 connection.
- 9 n. Failed to properly construct the north/south ridge
10 line of the roof.
- 11 o. Failed to properly flash the chimney housing.
- 12 p. Failed to install a spark arrestor and flashing at
13 the chimney flue.
- 14 q. Constructed the rear chimney housing out of plumb,
15 racked out of square and with a large bulge in the housing.
- 16 r. Failed to repair and/or replace cracked tile in
17 the bathroom adjacent to the den.
- 18 s. Failed to grade the rear yard to drain away from
19 the structure.
- 20 t. Failed to seal and/or cover exposed plumbing in
21 the concrete at the rear of the den.
- 22 u. Failed to install flashing in the area of the
23 gable windows.
- 24 v. Failed to caulk around the gable windows.
- 25 w. Failed to correctly install blocks at the eaves.
- 26 x. Failed to properly install weatherproofing at
27 windows.

- 1 y. Failed to install concrete slab at garage door to
2 drain away from the structure.
- 3 z. Failed to paint inside of garage door.
- 4 aa. Installed concrete deck area at the rear of the
5 addition at the same level as the addition.
- 6 bb. Failed to install building paper at the top of the
7 exterior siding.
- 8 cc. Failed to properly join exterior wall coverings at
9 corners, roof lines or along the base on the west wall of the
10 den, leaving rough framing exposed.
- 11 dd. Poured concrete too high at the threshold at the
12 rear of the structure.
- 13 ee. Poured concrete too high at the south side of the
14 structure.
- 15 ff. Failed to correctly install water heater vent.
- 16 gg. Failed to correctly install electrical outlet by
17 the pool.
- 18 hh. Failed to construct the remodel/addition
19 dimensionally square.
- 20 ii. Failed to comply with the dimension requirements
21 for the addition/remodel.
- 22 jj. Failed to install water heater at the proper
23 location.
- 24 kk. Failed to install threshold along the garage door.
- 25 ll. Failed to install an operational flume draw in the
26 rear fireplace.
- 27 //

1 mm. Failed to complete finish carpentry in the
2 kitchen.

3
4 6. Respondent has subjected its license to discipline
5 under Business and Professions Code section 7109(b) in that on
6 the Comfort project respondent willfully departed from or
7 disregarded the plans or specifications without the owner's
8 consent with prejudice to the owner in the following material
9 respects:

10 a. Failed to install footings at proper locations.

11 b. Failed to install footings under bearing wall at
12 the east wall of the den.

13 c. Failed to construct and install the roof in
14 accordance with the plans.

15 d. Failed to construct the remodel/addition
16 dimensionally square.

17 e. Failed to comply with the dimension requirements
18 for the addition/remodel.

19 f. Failed to provide framing to allow adequate space
20 for R 30 insulation.

21 g. Failed to install a Simpson H 2.5 tie at each
22 rafter.

23 h. Failed to bevel cut the stress block to match the
24 roof sheathing, but instead set the block at an angle.

25 i. Installed a 2x6 roof rafter over the bedroom and
26 bath, rather than a 2x8 rafter.

27 j. Installed three windows at the front of the home

1 instead of four windows.

2 k. Failed to install gas lines or vent in the
3 fireplace in the den.

4 l. Failed to comply with the dimension requirements
5 for the addition/remodel.

6 m. Installed concrete slab in the living area without
7 a sand base.

8 n. Constructed two irregular pop-out framed and
9 finished areas on the exterior of the west wall of the den
10 instead of constructing a flush wall.

11

12 7. Respondent has subjected its license to discipline
13 under Business and Professions Code section 7113 in that
14 respondent failed in a material respect to complete the Comfort
15 project for the contract price and the owners will be required to
16 spend a substantial sum in excess of the contract price to
17 complete the project in accordance with the contract.

18

19 8. Respondent has subjected its license to discipline
20 under Business and Professions Code section 7116 in that
21 respondent willfully departed from plans and specifications in
22 constructing the roof on the Comfort project, thereby
23 substantially injuring Michael and Diane Comfort, who were or
24 will be required to expend a substantial amount in order to
25 repair and/or reconstruct their home to ensure a structurally
26 sound dwelling.

27 //

1 9. Respondent has subjected its license to discipline
2 under Business and Professions Code section 7115 in that
3 respondent did not comply with section 7159 of that code on the
4 Comfort project in that on January 9, 1992, respondent demanded
5 and received a total down payment of \$8,000 prior to commencing
6 work on the project, such sum being in excess of the maximum down
7 payment of \$1,000, authorized by subdivision (d).

8
9 **OTHER MATTERS**

10 10. Under Business and Professions Code sections 7097
11 and 7098, if license number 521167 issued to respondent is
12 suspended or revoked, the Registrar may suspend or revoke,
13 without notice, any other license issued in the name of John
14 Robert Watkins or for which John Robert Watkins furnished the
15 qualifying experience or appearance.

16
17 11. Under Business and Professions Code section
18 7121.5, if discipline is imposed on license number 521167 issued
19 to respondent, John Robert Watkins shall be prohibited from
20 serving as an officer, director, associate, partner, or
21 qualifying individual of any licensee during the time the
22 discipline is imposed, and any licensee which employs, elects, or
23 associates John Robert Watkins shall be subject to disciplinary
24 action.

25
26 12. The facts alleged in paragraphs 4, 5, 6 and 7
27 constitute breaches of the home improvement contract on the

1 Comfort project, and under Government Code section 11519(d), the
2 Registrar may require restitution of damages suffered as a result
3 of such breaches as a condition of probation in the event
4 probation is ordered.

5
6 13. Under Business and Professions Code section 7095,
7 the Registrar in making his order may:

8 a. Provide for the immediate complete suspension by
9 the licensee of all operations as a contractor during the period
10 fixed by the decision.

11 b. Permit the licensee to complete any or all
12 contracts shown by competent evidence taken at the hearing to be
13 then uncompleted.

14 c. Impose upon the licensee compliance with such
15 specific conditions as may be just in connection with its
16 operations as a contractor disclosed at the hearing, and may
17 further provide that until such conditions are complied with no
18 application for restoration of the suspended or revoked license
19 shall be accepted by the Registrar.

20
21 WHEREFORE, complainant prays that a hearing be held and
22 that the Registrar of Contractors make his order:

23 1. Revoking or suspending license number 521167,
24 issued to J. R. Construction, with John Robert Watkins, owner.

25 2. Prohibiting John Robert Watkins from serving as an
26 officer, director, associate, partner, or qualifying individual
27 of any licensee during the period that discipline is imposed on
28 license number 521167, issued to J. R. Construction.

1 3. Revoking or suspending any other license for which
2 John Robert Watkins is furnishing the qualifying experience or
3 appearance.

4 4. Ordering restitution of all damages according to
5 proof suffered by Michael and Diane Comfort as a result of
6 breaches of the home improvement contract as a condition of
7 probation in the event probation is ordered.

8 5. Ordering restitution of all damages suffered by
9 Michael and Diane Comfort as a result of John Robert Watkins'
10 conduct as a contractor, as a condition of restoration of license
11 number 521167, issued to J. R. Construction.

12 6. Ordering John Robert Watkins to pay to the
13 Registrar of Contractors his costs in investigating and enforcing
14 the case according to proof at the hearing, pursuant to Business
15 and Professions Code section 125.3.

16 7. Ordering John Robert Watkins to provide the
17 Registrar with a listing of all contracting projects in progress
18 and the anticipated completion date of each.

19 8. Taking such other and further action as may be
20 deemed proper and appropriate.

21 DATED: February 14, 1995

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PAIGE B. ROUSH
Assistant Regional Deputy
Contractors' State License Board
Department of Consumer Affairs
State of California

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Complainant

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