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

In the Matter of the First Amended Accusation Against: **COMPLETE SOLAR, INC., dba SUNPOWER;** **JOHN FRANCES CAREY, RME C-10, C-46;** **CHRISTOPHER TAVIS BAGLEY, RME B** 1403 N. Research Way Orem, UT 84097 Contractor's License No. 961988, B, C-10, C-46 Respondents.	Case No. N2023-345 **FIRST AMENDED ACCUSATION**

PARTIES

1. Brian Melvin (Complainant) brings this First Amended Accusation solely in his official capacity as the Supervising Special Investigator I of the Contractors State License Board (Board), Department of Consumer Affairs.

2. On June 10, 2011, the Registrar of Contractors (Registrar) issued Contractor's License Number 961988 in Classification B (General Building Contractor) to Complete Solar, Inc. (Respondent Complete Solar), dba Sunpower. Classification B was removed from the license on April 6, 2014. Classification B was restored to the contractor's license on May 3, 2022, when

Christopher Tavis Bagley (Respondent Bagley) associated as the Responsible Managing Employee for the B Classification. Respondent Bagley disassociated on April 17, 2025, and the B Classification was removed from Respondent's license on July 16, 2025.

3. Classification C-46 (Solar Contractor) was added to Respondent Complete Solar's license on August 4, 2011. It was removed on April 6, 2014, and was restored on September 25, 2017.

4. Classification C-10 (Electrical Contractor) was added to the Respondent Complete Solar's license on August 29, 2011.

5. John Frances Carey (Respondent Carey) associated as Responsible Managing Employee for the C-10 and C-46 Classifications on October 18, 2021, and December 8, 2021, respectively.

6. Respondent Complete Solar's license will expire on October 31, 2027, unless renewed.

7. Thurman John Rodgers was listed as the Chief Executive Officer of Respondent Complete Solar in the records of the California Secretary of State dated June 26, 2024, but did not associate with the Registrar, as Chief Executive Officer and President of Respondent Complete Solar, until October 22, 2025.

8. Dan Foley was listed as the Chief Financial Officer of Respondent Complete Solar in the records of the California Secretary of State dated June 26, 2024. However, Respondent Complete Solar did not disclose to the Registrar that Dan Foley occupied this position.

9. Brian Wuebbels was listed as the Secretary of Respondent Complete Solar in the records of the California Secretary of State dated February 7, 2023, April 3, 2024, and June 26, 2024. However, Respondent Complete Solar did not disclose to the Registrar that Brian Wuebbels occupied this position.

10. Carol Smith was listed as the Director of Respondent Complete Solar in the records of the California Secretary of State dated February 7, 2023, April 3, 2024, and June 26, 2024. However, Respondent Complete Solar did not disclose to the Registrar that Carol Smith occupied this position.

PERSONNEL OF RECORD

11. "Members of the personnel of record" of an entity that holds a contractor's license is defined in Business and Professions Code section 7025 and "means every person listed in the records of the registrar as then associated with a licensee." Respondent Complete Solar is a corporation organized under the laws of California, and listed the following individuals as associated personnel in addition to those named above, who are of record with the Board and not named as respondents: William James Anderson became Chief Executive Officer and President on October 17, 2017, and was removed on August 11, 2025. Carl Widney Jasper became an Officer on October 19, 2021, and was removed on April 17, 2025. Steven Leslie Erickson and Nicolas Laurent Wenker were associated with the Registrar as Officers on January 29, 2026. Jeanne Nguyen was associated with the Registrar as an Officer on February 20, 2026.

JURISDICTION

12. This First Amended Accusation is brought before the Registrar for the Board under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

13. Code section 118, subdivision (b), states:

> The suspension, expiration, or forfeiture by operation of law of a license issued by a board in the department, or its suspension, forfeiture, or cancellation by order of the board or by order of a court of law, or its surrender without the written consent of the board, shall not, during any period in which it may be renewed, restored, reissued, or reinstated, deprive the board of its authority to institute or continue a disciplinary proceeding against the licensee upon any ground provided by law or to enter an order suspending or revoking the license or otherwise taking disciplinary action against the licensee on any such ground.

14. Code section 7076.5, subdivision (h), states:

> The inactive status of a license shall not bar any disciplinary action by the board against a licensee for any of the causes stated in this chapter.

15. Code section 7090 provides that the Registrar may suspend or revoke any license or registration if the licensee or registrant is guilty of or commits any one or more of the acts or omissions constituting cause for disciplinary action.

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16. Code section 7106.5 states:

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.

17. Code section 7121.5 states:

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

STATUTORY PROVISIONS

18. Code section 7083 states:

(a) Notwithstanding any other law, licensees shall notify the registrar, on a form prescribed by the registrar, in writing within 90 days of any change to information recorded under this chapter. This notification requirement shall include, but not be limited to, changes in business address, personnel, business name, qualifying individual bond exemption pursuant to Section 7071.9, or exemption to qualify multiple licenses pursuant to Section 7068.1.

(b) Failure of the licensee to notify the registrar of any change to information within 90 days shall cause the change to be effective the date the written notification is received at the board's headquarters office.

(c) Failure to notify the registrar of the changes within the 90 days is grounds for disciplinary action.

19. Code section 7107 states:

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

20. Code section 7109, subdivision (a), states:

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

21. Code section 7111.1 states:

The failure of, or refusal by, a licensee to respond to a written request of the registrar to cooperate in the investigation of a complaint against that licensee constitutes a cause for disciplinary action.

22. Code section 7113 states:

Failure in a material respect on the part of a licensee to complete any construction project or operation for the price stated in the contract for such construction project or operation or in any modification of such contract constitutes a cause for disciplinary action.

23. Code section 7116 states:

The doing of any willful or fraudulent act by the licensee as a contractor in consequence of which another is substantially injured constitutes a cause for disciplinary action.

24. Code section 7117 states:

Acting in the capacity of a contractor under any license issued hereunder except: (a) in the name of the licensee as set forth upon the license, or (b) in accordance with the personnel of the licensee as set forth in the application for such license, or as later changed as provided in this chapter, constitutes a cause for disciplinary action.

25. Code section 7119 states:

Willful failure or refusal without legal excuse on the part of a licensee as a contractor to prosecute a construction project or operation with reasonable diligence causing material injury to another constitutes a cause for disciplinary action.

26. Code section 7154, states, in pertinent part:

(a) A home improvement contractor licensed under this chapter shall notify the registrar in writing, on a form prescribed by the registrar, about the employment of a registered home improvement salesperson, pursuant to the terms of this article. This notification requirement shall include, but not be limited to, the name and registration number of the home improvement salesperson who is employed by the contractor. The form shall be submitted prior to the home improvement salesperson beginning work for the contractor.

(b) A home improvement contractor shall notify the registrar in writing, on a form prescribed by the registrar, when a registered home improvement salesperson ceases to be employed by the contractor. This notification requirement shall include, but not be limited to, the name and registration number of the home improvement salesperson who had been employed by the contractor. The form shall be submitted within 90 days after the home improvement salesperson ceases to be employed by the contractor.

(c) A home improvement contractor who employs a registered home improvement salesperson to sell home improvement contracts, but who fails to report to the registrar pursuant to subdivision (a) or (b), is subject to disciplinary action by the registrar.

(d) A home improvement contractor who employs a person to sell home improvement contracts while such person is not registered by the registrar as a home improvement salesman as provided in this article, is subject to disciplinary action by the registrar.

27. Code section 7159 states:

(a)(1) This section identifies the projects for which a home improvement contract is required, outlines the contract requirements, and lists the items that shall be included in the contract, or may be provided as an attachment.

. . .

(5) Failure by the licensee, his or her agent or salesperson, or by a person subject to be licensed under this chapter, to provide the specified information, notices, and disclosures in the contract, or to otherwise fail to comply with any provision of this section, is cause for discipline.

(b) For purposes of this section, "home improvement contract" means an agreement, whether oral or written, or contained in one or more documents, between a contractor and an owner or between a contractor and a tenant, regardless of the number of residence or dwelling units contained in the building in which the tenant resides, if the work is to be performed in, to, or upon the residence or dwelling unit of the tenant, for the performance of a home improvement, as defined in Section 7151, and includes all labor, services, and materials to be furnished and performed thereunder, if the aggregate contract price specified in one or more improvement contracts, including all labor, services, and materials to be furnished by the contractor, exceeds five hundred dollars ($500). "Home improvement contract" also means an agreement, whether oral or written, or contained in one or more documents, between a salesperson, whether or not he or she is a home improvement salesperson, and an owner or a tenant, regardless of the number of residence or dwelling units contained in the building in which the tenant resides, which provides for the sale, installation, or furnishing of home improvement goods or services.

(c) In addition to the specific requirements listed under this section, every home improvement contract and any person subject to licensure under this chapter or his or her agent or salesperson shall comply with all of the following:

. . .

(d) A home improvement contract and any changes to the contract shall be in writing and signed by the parties to the contract prior to the commencement of work covered by the contract or an applicable change order and, except as provided in paragraph (8) of subdivision (a) of Section 7159.5, shall include or comply with all of the following:

. . .

(7) The heading: "Description of the Project and Description of the Significant Materials to be Used and Equipment to be Installed," followed by a description of the project and a description of the significant materials to be used and equipment to be installed. For swimming poos, the project description required under this paragraph also shall include a plan and scale drawing showing the shape, size, dimensions, and the construction and equipment specifications. . . .

(10) The contract shall address the commencement of work to be performed in substantially the following form:

(A) A statement that describes what constitutes substantial commencement of work under the contract.

(B) The heading: "Approximate Start Date."

(C) The approximate date on which work will be commenced.

. . . .

28. Code section 7159.5 states:

This section applies to all home improvement contracts, as defined in Section 7151.2, between an owner or tenant and a contractor, whether a general contractor or a specialty contractor, that is licensed or subject to be licensed 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 provisions is cause for discipline:

. . .

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

. . . .

COST RECOVERY, RESTITUTION AND OTHER AUTHORITY

29. Code section 125.3 states:

(a) Except as otherwise provided by law, in any order issued in resolution of a disciplinary proceeding before any board within the department or before the Osteopathic Medical Board, upon request of the entity bringing the proceeding, the administrative law judge may direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

(b) In the case of a disciplined licentiate that is a corporation or a partnership, the order may be made against the licensed corporate entity or licensed partnership.

. . . .

30. Government Code section 11519 states:

(a) The decision shall become effective 30 days after it is delivered or mailed to respondent unless: a reconsideration is ordered within that time, or the agency itself orders that the decision shall become effective sooner, or a stay of execution is granted.

(b) A stay of execution may be included in the decision or if not included therein may be granted by the agency at any time before the decision becomes effective. The stay of execution provided herein may be accompanied by an express condition that respondent comply with specified terms of probation provided; provided, however, that the terms of probation shall be just as reasonable in light of the findings and decision.

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(c) If respondent was required to register with any public officer, a notification of any suspension or revocation shall be sent to the officer after the decision has become effective.

(d) As used in subdivision (b), specified terms of probation may include an order of restitution. Where restitution is ordered and paid pursuant to the provisions of this subdivision, the amount paid shall be credited to any subsequent judgment in a civil action.

(e) The person to which the agency action is directed may not be required to comply with a decision unless the person has been served with the decision in the manner provided in Section 11505 or has actual knowledge of the decision.

(f) A nonparty may not be required to comply with a decision unless the agency has made the decision available for public inspection and copying or the nonparty has actual knowledge of the decision.

(g) This section does not preclude an agency from taking immediate action to protect the public interest in accordance with Article 13 (commencing with Section 11460.10) of Chapter 4.5.

31. Code section 143.5, subdivision (b), states:

Any board, bureau, or program within the Department of Consumer Affairs that takes disciplinary action against a licensee or licensees based on a complaint or report that has also been the subject of a civil action and that has been settled for monetary damages providing for full and final satisfaction of the parties may not require its licensee or licensees to pay any additional sums to the benefit of any plaintiff in the civil action.

32. Code section 7095 states:

(a) The decision may:

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

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

(3) Impose upon the licensee compliance with such specific terms and conditions as may be just in connection with the licensee's operations as a contractor disclosed at the hearing and may further provide that until those terms and conditions are complied with no application for restoration of the suspended or revoked license shall be accepted by the registrar.

(4)(A) Provide for the stay of execution of the decision pending completion of specified terms and conditions of probation.

(B) Failure to fully comply with the terms and conditions of probation set pursuant to subparagraph (A) may result in automatic termination of the stay of execution without further notice. If a stay of execution is terminated pursuant to this subparagraph, the decision shall be considered a disciplinary action within the meaning of this chapter.

(b) The specific terms and conditions imposed pursuant to paragraph (3) or (4) of subdivision (a) may include, but are not limited to, any of the following:

(1) Payment of restitution to persons injured as a result of the violation.

(2) Payment of the costs of investigation and enforcement pursuant to Section 125.3.

(3) Enrollment in, and completion of, specified administrative or trade-specific coursework.

(4) Successful completion of the board's law and business examination or trade examination, as appropriate.

(5) Any further terms and conditions as are set forth for specified violations in the board's disciplinary guidelines in Section 871 of Title 16 of the California Code of Regulations.

33. Code section 7097 states:

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

34. Code section 7098 states:

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

35. Code section 7102 states:

After suspension of a license upon any of the grounds set forth in this chapter [the Contractors State License Law], the registrar may reinstate the license upon proof of compliance by the contractor with all provisions of the decision as to reinstatement or, in the absence of a decision or any provisions of reinstatement, in the sound discretion of the registrar.

After revocation of a license upon any of the grounds set forth in this chapter, the license shall not be reinstated or reissued and a license shall not be issued to any member of the personnel of the revoked licensee found to have had knowledge of or participated in the acts or omissions constituting grounds for revocation, within a minimum period of one year and a maximum period of five years after the final decision of revocation and then only on proper showing that all loss caused by the act or omission for which the license was revoked has been fully satisfied and that all conditions imposed by the decision of revocation have been complied with.

The board shall promulgate regulations covering the criteria to be considered when extending the minimum one-year period. The criteria shall give due

consideration to the appropriateness of the extension of time with respect to the following factors:

(a) The gravity of the violation.

(b) The history of previous violations.

(c) Criminal convictions.

When any loss has been reduced to a monetary obligation or debt, however, the satisfaction of the monetary obligation or debt as a prerequisite for the issuance, reissuance, or reinstatement of a license shall not be required to the extent the monetary obligation or debt was discharged in a bankruptcy proceeding. However, any nonmonetary condition not discharged in a bankruptcy proceeding shall be complied with prior to the issuance, the reissuance, or reinstatement of the license.

FACTUAL ALLEGATIONS

Menifee Project

36. On September 19, 2022, J.M. (homeowner) entered a home improvement contract with Respondent Complete Solar for installation of a 30-panel, 10.95 Kw rooftop solar system at J.M.'s residence, located on Tremont Drive, in Menifee, California (Menifee project), for the price of $36,557.50. The contract was deficient because it did not include the beginning and ending dates for the project as required by law. Two change orders were added but it did not change the amount of the contract: Change Order #1 dated February 16, 2023, to switch from generation meter adapter to a main breaker derate; and Change Order #2 dated February 23, 2023, for the removal of line side tap and addition of a main breaker derate.

37. The solar panels were installed in December of 2022; however, Respondent Complete Solar did not submit the correct application to the utility company to obtain a Permission To Operate (PTO).

38. The utility company received three different applications from Respondent Complete Solar for the PTO, and the utility company required that Respondent Complete Solar cancel two of the applications before the utility company could review the correct one. It took approximately 16 months and several efforts by the homeowner to have Respondent Complete Solar cancel the incorrect applications with the utility company. The utility company approved the PTO on April 29, 2024, approximately 18 months after the contract was entered.

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39. Respondent Complete Solar willfully failed or refused without legal excuse to prosecute the Menifee project with reasonable diligence because of its delay in obtaining a PTO from the utility company. This caused material injury to J.M., who did not have a functioning solar system.

40. Respondent Complete Solar requested and accepted full payment before completing the Menifee project, before providing a Generation Meter Adapter to connect the solar system to the utility grid, and before obtaining a final inspection and PTO.

FIRST CAUSE FOR DISCIPLINE

(Failure to Prosecute Project Diligently – Respondent Complete Solar)

41. Respondent Complete Solar has subjected its contractor's license to disciplinary action under Code section 7119, in that it willfully failed or refused without legal excuse to prosecute the Menifee project with reasonable diligence, as more particularly set forth above in paragraphs 37 through 40.

SECOND CAUSE FOR DISCIPLINE

(Violation of the Home Improvement Contract Provisions – Respondent Complete Solar)

42. Respondent Complete Solar has subjected its contractor's license to disciplinary action under Code section 7159, subdivision (d)(10), in that its home improvement contract for the Menifee project did not include beginning and ending dates on the project.

THIRD CAUSE FOR DISCIPLINE

(Failure to Comply with the Home Improvement Contract Requirements – Respondent Complete Solar)

43. Respondent Complete Solar has subjected its contractor's license to disciplinary action under Code section 7159.5, subdivision (a)(5), in that Respondent Complete Solar requested and received payment in full before the completion of the Menifee project.

Santa Rosa Project

44. On October 18, 2022, D.W.M. (homeowner) entered into a home improvement contract with Respondent Complete Solar for the installation of roof solar panels and a new

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electrical panel at D.W.M.'s residence located on Hall Road, in Santa Rosa, California (Santa Rosa project), for the price of $52,720.

45. Respondent Complete Solar began work on the Santa Rosa project on January 9, 2023, and ceased in or about August of 2023. Due to disagreements regarding the performance of the contract, D.W.M. completed the project himself by fixing the breaker, cleaning up debris, and working with the City of Santa Rosa Building Department to complete the final inspection.

46. On November 9, 2023, a Board investigator called Respondent Complete Solar's Responsible Managing Employees (RME), who were Respondent Carey and Respondent Bagley. The investigator got no answer at either of their numbers and was unable to leave a voicemail with either RME. On that same date, the investigator sent a letter to Respondent Complete Solar and Respondent Bagley which detailed the investigator's attempt to make contact, requested a call to discuss a complaint, and gave notice that failure to cooperate in an investigation constitutes cause for disciplinary action. The investigator got no response to the letter. On December 12, 2023, the investigator called Respondent Carey and Respondent Bagley again, got no answer at either number, and was only able to leave a voice mail message for Respondent Bagley. On February 13, 2024, the investigator attempted to call the then-C.E.O. and President of Respondent Complete Solar, William Anderson, but the telephone number was disconnected. On February 26, 2024, the investigator made a fourth and final attempt to contact Respondent Complete Solar, to no avail. On February 29, 2024, the investigator called Respondent Bagley, got no answer, and left a voicemail. The investigator never received a response from any respondent. Respondent Complete Solar thus failed to cooperate in the Board's investigation.

FOURTH CAUSE FOR DISCIPLINE

(Failure to Cooperate in the Board's Investigation – Respondent Complete Solar)

47. Respondent Complete Solar has subjected its contractor's license to disciplinary action under Code section 7111.1, in that it failed to cooperate in the Board's investigation of the Santa Rosa project.

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Vacaville Project

48. On January 20, 2023, Andrew Clemons, a home improvement salesperson, acting on behalf of Respondent Complete Solar, entered into a home improvement contract with J.C. (homeowner) to install a 22-panel, 8.14 Kw rooftop solar system at her residence on Plantation Court, in Vacaville (Vacaville project), for the price of $60,724.33. Respondent Complete Solar has been paid in full. Work commenced on January 25, 2023, and was last performed on or about October 11, 2023.

49. From February through April 2024, J.C. experienced electrical issues, including loss of power to the dryer, air conditioner, pool pump, and stove. J.C. hired an electrician who determined that the solar contact was not hooked up properly, preventing power from getting to the appliances/equipment. J.C. notified Respondent Complete Solar, but it failed to address the problem. On October 30, 2024, J.C. contacted Ambrose Solar (Ambrose) to inspect the solar system for problems, at a cost of $385. Ambrose Solar found that the feet on the solar panels were not installed correctly.

50. On November 20, 2024, J.C. experienced a roof leak that damaged the ceiling and closets in the master bedroom and a second bedroom.

51. On November 24, 2024, J.C. notified Respondent Complete Solar of the roof leak problem, but it failed to return to the project to address the leak.

52. On November 25, 2024, J.C. hired Roofing Solutions, Inc. to install a roof tarp to prevent water intrusion, at a cost of $787.00.

53. On July 25, 2025, an industry expert inspected the Vacaville project, and determined that the roof leaks resulted from Respondent Complete Solar's failure to properly seal nail holes in the roof, and its failure to waterproof the solar panel brackets. CSLB's investigator determined that J.C.'s financial injury was $10,662.00, and Complete Solar paid this amount to J.C. on or about February 17, 2026.

54. J.C. was also harmed because due to Respondent Complete Solar's poor workmanship and abandonment, she got no electrical production from the solar system to reduce her utility bills.

FIFTH CAUSE FOR DISCIPLINE

(Abandonment – Respondent Complete Solar)

55. Respondent Complete Solar has subjected its contractor's license to disciplinary action under Code section 7107, because it abandoned the Vacaville project without legal excuse, by failing to return to the project to address the leaking roof after being notified by J.C. of the problem on November 24, 2024. Furthermore, Respondent Complete Solar failed to make repairs after the homeowner experienced mechanical issues and appliances stopped working, as set forth above in paragraphs 48 to 54.

SIXTH CAUSE FOR DISCIPLINE

(Departure from Accepted Trade Standards – Respondent Complete Solar)

56. Respondent Complete Solar has subjected its contractor's license to disciplinary action under Code section 7109, subdivision (a), because on the Vacaville project, it willfully departed from accepted trade standards for good and workmanlike construction, in the following material respects:

a. Respondent Complete Solar failed to install a completely operational solar system that produced electricity, because the solar panel was not properly wired.

b. Respondent Complete Solar failed to properly seal the nail holes in the roof, causing the roof to leak.

c. Respondent Complete Solar failed to waterproof/seal the solar panel brackets, causing the roof to leak.

SEVENTH CAUSE FOR DISCIPLINE

(Failure to Complete the Contract for the Contract Price – Respondent Complete Solar)

57. Respondent Complete Solar has subjected its contractor's license to disciplinary action under Code section 7113, because it failed in a material respect to complete the Vacaville project for the contract price and J.C. will be required to spend a sum in excess of the contract price to complete the project in accordance with the contract.

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EIGHTH CAUSE FOR DISCIPLINE

(Failed to Report Home Improvement Salesman – Respondent Complete Solar)

58. Respondent Complete Solar has subjected its contractor's license to disciplinary action under Code section 7154, subdivision (c), because it failed to report its employment of Home Improvement Salesperson Andrew Clemons to the Board.

NINTHH CAUSE FOR DISCIPLINE

(Willful Injury)

59. Respondent Complete Solar has subjected its contractor's license to disciplinary action under Code section 7116, because it willfully failed to provide J.C. with an operable solar system, and J.C. thus received little or no cost savings on her electrical bills.

Rocklin Project

60. On or about July 30, 2023, G.R. (homeowner) entered a home improvement contract with Respondent Complete Solar for installation of a 17-panel, 5.95 Kw solar system and two back-up batteries at G.R.'s residence on West Imperial View Court in Rocklin (Rocklin project), for the price of $45,941.80. The contract was deficient because it did not include the beginning and ending dates for the project as required by law, and did not provide the brand name and specifications of the batteries to be installed. G.R. has not made any payment on the contract.

61. On July 30, 2023, Andrew Clemons, a home improvement salesperson acting on behalf of Respondent Complete Solar, entered into a second contract with G.R. The scope of work and contract price did not change.

62. On March 15, 2024, Josh Webb, an unregistered home improvement salesperson acting on behalf of Respondent Complete Solar, entered into a third contract with G.R. due to G.R.'s credit application expiring and the job not being completed. The scope of work and contract price did not change.

63. The solar panels were installed on the Rocklin project between January and March 2023. In March 2023, Respondent Complete Solar told G.R. it would call for a final inspection. G.R. asked when the batteries would be installed and was told someone would contact him.

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64. On January 25, 2023, a company representative (Giana) told G.R. that Respondent Complete Solar would have to seek a separate permit for the batteries.

65. On April 6, 2023, G.R. sought an update on the installation of the batteries. Mario stated that Respondent Complete Solar needed to make changes to the permit packet and would inform G.R. when a permit was obtained and set a date to install the batteries.

66. On July 19, 2023, G.R. asked Mario for the permit number pertaining to the installation of the batteries so that he could follow up with the building department. G.R. contacted the building department and was told that no revisions were ever required to the permit application.

67. On August 23, 2023, G.R. contacted Respondent Complete Solar to ask about battery installation and when final inspection would be performed. Respondent Complete Solar responded with a message that it would perform corrections at the project on August 24, 2023.

68. On September 22, 2023, a second site visit was scheduled to perform additional corrections on the project.

69. On October 3, 2023, G.R. received a message from Respondent Complete Solar stating that batteries would be installed on October 10, 2023. Respondent Complete Solar failed to install the batteries.

70. On December 28, 2023, G.R. received a message from Respondent Complete Solar stating it would complete the project, including installation of the batteries.

71. In January 2024, the batteries were installed.

72. On July 16, 2024, the building department conducted a final inspection. However, PG&E never inspected the Rocklin project, leaving the solar system non-operational.

73. On June 6, 2025, a Board investigator contacted Respondent Complete Solar about the failure to obtain PTO, and was told there was a problem in the application documents that was being addressed.

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TENTH CAUSE FOR DISCIPLINE

(Failure to Prosecute Project Diligently – Respondent Complete Solar)

74. Respondent Complete Solar has subjected its contractor's license to disciplinary action under Code section 7119, because it willfully failed or refused without legal excuse to prosecute the Rocklin project with reasonable diligence, causing a material injury to G.R. because for more than two years the solar system has remained non-operational.

ELEVENTH CAUSE FOR DISCIPLINE

(Failed to Report Home Improvement Salesperson – Respondent Complete Solar)

75. Respondent Complete Solar has subjected its contractor's license to disciplinary action under Code section 7154, subdivision (c), because it failed to report its employment of Home Improvement Salesperson Andrew Clemons to the Board.

TWELFTH CAUSE FOR DISCIPLINE

(Unregistered Home Improvement Salesperson – Respondent Complete Solar)

76. Respondent Complete Solar has subjected its contractor's license to disciplinary action under Code section 7154, subdivision (d), because it employed unregistered home improvement salesperson Josh Webb to sell a home improvement contract.

THIRTEENTH CAUSE FOR DISCIPLINE

(Violation of the Home Improvement Contract Provisions – Respondent Complete Solar)

77. Respondent Complete Solar has subjected its contractor's license to disciplinary action under Code section 7159, because on the Rocklin project it failed to comply with the following provisions:

a. **Subdivision (d)(7):** The home improvement contract failed to provide the brand name and specifications of the batteries to be installed on the project.

b. **Subdivision (d)(10) and (11):** The home improvement contract did not provide approximate beginning and ending dates of the project.

Allegations Regarding Undisclosed Personnel

78. On February 7, 2023, Respondent Complete Solar changed its list of officers in its Statement of Information with the California Secretary of State. It failed to notify the Registrar in

writing, within 90 days, of these personnel changes. Again, on April 3, 2024, and June 26, 2024, Respondent Complete Solar filed Statement of Information forms with the California Secretary of State that listed officers it had not disclosed to the Registrar. Therefore, Respondent Complete Solar operated with undisclosed personnel not listed under Contractor's License Number 961988.

FOURTEENTH CAUSE FOR DISCIPLINE

(Failure to Notify Registrar of Changes in Personnel – Respondent Complete Solar)

79. Respondent Complete Solar has subjected its contractor's license to disciplinary action under Code section 7083, because it failed to notify the Registrar within 90 days after it made changes in its personnel of record, as detailed above in paragraphs 7 through 11 and 78.

FIFTEENTH CAUSE FOR DISCIPLINE

(Operating as Contractor with Undisclosed Personnel – Respondent Complete Solar)

80. Respondent Complete Solar has subjected its contractor's license to disciplinary action under Code section 7117, subdivision (b), because since February 7, 2023, Respondent Complete Solar operated with officers that it had not disclosed to the Registrar, as detailed above in paragraphs 7 through 11 and 78.

DISCIPLINE CONSIDERATIONS

81. To determine the degree of discipline, if any, to be imposed on Respondent Complete Solar, Complainant alleges the following:

a. On June 9, 2017, Citation No. 2 2016 2875 was issued to Respondent Complete Solar for violation of Code section 7154, subdivision (d) (employment of unregistered home improvement salesperson). The civil penalty was paid, and the citation is final.

b. On June 7, 2018, Citation No. 2 2017 3113 was issued to Respondent Complete Solar for violation of Code sections 7109, subdivision (a) (departure from trade standards); 7109, subdivision (b) (departure from plans and specifications); 7113 (failure to complete contract for contract price); and 7154, subdivision (d) (employment of unregistered home improvement salesperson). The civil penalties were paid, and the citation is final.

c. On June 14, 2018, Citation No. 2 2017 3141 was issued to Respondent Complete Solar for violation of Code sections 7109, subdivision (a) (departure from trade

standards); 7154, subdivision (d) (employment of unregistered home improvement salesperson); and 7159 (contract violations). The civil penalties were paid, and the citation is final.

d. On January 31, 2020, Accusation No. N2018-220 was filed against Respondent Complete Solar for violation of Code sections 7109, subdivision (a), departure from trade standards; 7109, subdivision (b), departure from plans and specifications; 7113, failure to complete contract for contract price; 7154, subdivision (d), employment of unregistered home improvement salesperson; 7159, contract violations; 7161, subdivision (b), making substantial misrepresentation in the procurement of contract; 7162, failure to install the specific goods or materials as represented; and 7163, making obtaining of loan by the buyer a condition precedent to contract. Respondent Complete Solar was placed on probation for four years, effective September 3, 2020, with terms and conditions. That probation is now complete.

Causes for Other Action

FIRST CAUSE FOR OTHER ACTION

(Restrictions on Qualifier – Respondent John Frances Carey)

82. Pursuant to Code section 7121.5, if Respondent Complete Solar's contractor's license is revoked or suspended, Respondent Carey shall be prohibited from serving as an officer, director, associate, partner, manager, or qualifying individual of a licensee during the time the discipline is imposed, whether or not he had knowledge of or participated in the acts or omissions constituting grounds for discipline, and any licensee which employs, elects, or associates Respondent Carey other than as a bona fide nonsupervising employee shall be subject to disciplinary action.

SECOND CAUSE FOR OTHER ACTION

(Restrictions on Qualifier – Respondent Christopher Tavis Bagley)

83. Pursuant to Code section 7121.5, if Respondent Complete Solar's contractor's license is revoked or suspended, Respondent Bagley shall be prohibited from serving as an officer, director, associate, partner, manager, or qualifying individual of a licensee during the time the discipline is imposed, whether or not he had knowledge of or participated in the acts or omissions constituting grounds for discipline, and any licensee which employs, elects, or associates

Respondent Bagley other than as a bona fide nonsupervising employee shall be subject to disciplinary action.

PRAYER

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

1. Ordering the revocation or suspension of Contractor's License Number 961988, issued to Complete Solar, Inc., pursuant to Code section 7090;

2. Ordering Respondent Complete Solar, Inc. to pay the Registrar costs for the investigation and enforcement of the case according to proof at the hearing, pursuant to Code section 125.3;

3. Ordering Respondent Complete Solar, Inc. to provide the Registrar with a listing of all contracting projects in progress and the anticipated completion date of each, pursuant to Code section 7095;

4. Ordering that Respondent John Frances Carey is prohibited from serving as an officer, director, associate, partner, manager or qualifying individual of a licensee, pursuant to Code section 7121.5;

5. Ordering that Respondent Christopher Tavis Bagley is prohibited from serving as an officer, director, associate, partner, manager or qualifying individual of a licensee, pursuant to Code section 7121.5; and,

6. Taking such other and further action deemed proper.

DATED: 6/26/2026

Brian Melvin

BRIAN MELVIN
Supervising Special Investigator I
Contractors State License Board
Department of Consumer Affairs
State of California
Complainant

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