ROB BONTA
Attorney General of California
THOMAS L. RINALDI
Supervising Deputy Attorney General
MICHAEL YI
Deputy Attorney General
State Bar No. 217174
300 So. Spring Street, Suite 1702
Los Angeles, CA 90013
Telephone: (213) 269-6483
Facsimile: (916) 731-2126
E-mail: Michael.Yi@doj.ca.gov
Attorneys for Complainant

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

In the Matter of the Accusation Against**:** **VLADIMIR FACTOR** 22647 Ventura Blvd. #272 Woodland Hills, CA 91364 Contractor's License No. 1046228, B, C39 Respondent.	Case No. N2025-145 **ACCUSATION**

PARTIES

1. Brian Melvin (Complainant) brings this 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 October 29, 2018, the Registrar of Contractors (Registrar) issued Contractor's License Number 1046228 in classification B (General Building) and classification C39 (Roofing) to Vladimir Factor (Respondent). The Contractor's License was in full force and effect at all times relevant to the charges brought in this Accusation and will expire on October 31, 2026, unless renewed.

///

JURISDICTION

3. This 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 unless otherwise indicated.

4. 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.

5. 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."

6. Section 7090 provides, in pertinent part, 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.

7. 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.

STATUTORY PROVISIONS

8. Section 7109, subdivision (a), states:

> (a) 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.

9. 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.

10. Section 7117, subdivision (a), states:

(a) 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.

11. 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 their agent or salesperson, to comply with the following provisions is cause for discipline:

. . .

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

. . .

COST RECOVERY, RESTITUTION AND OTHER AUTHORITY

12. Section 125.3 states, in pertinent part:

(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.

. . .

13. Section 11519 of the Government Code 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.

(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.

14. 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.

15. 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.

16. 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.

17. 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.

18. 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.

YORKTOWN PROJECT

19. On or about August 30, 2021, D. H.[1] (homeowner) entered into a contract with "Factor Design, Inc." (Factor) to build an accessory dwelling unit (ADU) at 7821 Yorktown Avenue in Los Angeles for $300,000 (the project). Respondent sold the contract on behalf of Factor and received deposits totaling $30,000. Work on the ADU commenced on or about February 18, 2023. Change orders increased the contract price by $66,000. Factor received payments totaling $366,000.04 for the project.

20. The work effectively stopped on August 23, 2023, when the ADU flooded after heavy rain. An opening in the exterior stucco and other issues were discovered. The homeowner paid $197,500 to another contractor to repair damage to the ADU and other issues with the project.

///

///

///

///

///

///

[1] Initials are used to protect individuals' privacy.

FIRST CAUSE FOR DISCIPLINE

(Willful Departure from Accepted Trade Standards)

21. Respondent is subject to disciplinary action under section 7109, subdivision (a), in that Respondent willfully departed in material respects from accepted trade standards for good and workmanlike construction, as follows:

a. Respondent did not waterproof prior to applying stucco.

b. Respondent did not install the correct size and pressure gas line for the tankless water heater.

c. Respondent did not install safety glass or devices on the windows.

d. Respondent did not properly install water supply lines to secure accurate temperature.

e. Respondent did not measure the roof slope properly, which led to a misaligned railing.

f. Respondent did not properly install the sliding doors, causing the door to not lock properly.

Complainant realleges paragraphs 19 and 20.

SECOND CAUSE FOR DISCIPLINE

(Failure to Complete Project for Contract Price)

22. Respondent is subject to disciplinary action under section 7113, in that Respondent failed in material respects to complete the project for the price stated in the contract. Complainant realleges paragraphs 19 and 20.

THIRD CAUSE FOR DISCIPLINE

(Contracting out of Namestyle)

23. Respondent is subject to disciplinary action under section 7117, subdivision (a), in that Respondent acted in the capacity of a contractor out of namestyle (Factor Design, Inc.) for which the license was issued. Complainant realleges paragraphs 19 and 20.

///

///

FOURTH CAUSE FOR DISCIPLINE

(Excessive Downpayment)

24. Respondent is subject to disciplinary action under section 7159.5, subdivision (a)(3), in that Respondent received downpayments for the project exceeding one thousand dollars ($1,000). Complainant realleges paragraphs 19 and 20.

PRAYER

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

1. Ordering the revocation or suspension of Contractor's License Number 1046228 issued to Respondent Vladimir Factor pursuant to section 7090;

2. Ordering restitution of all damages according to proof suffered by D. H., as a condition of probation in the event probation is ordered for Respondent Vladimir Factor, pursuant to Government Code section 11519, subdivision (d);

3. If revocation of Contractor's License Number 1046228, issued to Respondent Vladimir Factor is ordered, an order for restitution of all damages suffered by D. H. as a result of Respondent Vladimir Factor's conduct as a contractor, as a condition precedent to any future restoration of Contractor's License Number 1046228, or before any new license or registration is issued;

4. Ordering Respondent Vladimir Factor to pay the Registrar costs for the investigation and enforcement of the case according to proof at the hearing, pursuant to section 125.3;

5. Ordering that Respondent Vladimir Factor is prohibited from serving as an officer, director, associate, partner, manager, qualifying individual, or member of the personnel of record of a licensee, pursuant to section 7121;

6. Ordering Respondent Vladimir Factor to provide the Registrar with a listing of all contracting projects in progress and the anticipated completion date of each, pursuant to section 7095; and

///

///

7. Taking such other and further action deemed proper.

DATED: 10/20/2025

Brian Melvin

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

LA2025604138
67967349