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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. N2025-166

14 **MASTER PLUMBER COMPANY, INC.**
15 **DBA FULLSERV RESTORATION**
16 **ALEKSANDR YEFIM GULDSHTADT, RMO**
14431 Ventura Blvd., Ste 510
Sherman Oaks, CA 91423

17 **Contractor's License No. 1103649, B, C9, C20,**
18 **C36, C39**

ACCUSATION

Respondent.

19 **PARTIES**

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

23 2. On or about April 17, 2023, the Registrar of Contractors (Registrar) issued
24 Contractor's License Number 1103649, in Classifications C-9 (Drywall), Classification C-20
25 (Warm-Air Heating, Ventilating and Air Conditioning), and Classification C-36 (Plumbing) to
26 Master Plumber Company, Inc., doing business as Fullserv Restoration (Respondent Master). On
27 or about May 20, 2023, Respondent Master was issued a Classification C-39 (Roofing) license
28 and on or about April 11, 2024, Respondent Master was issued a Classification B (General

1 Building) license. On or about April 17, 2023, Aleksandr Yefim Guldshadt (Respondent
2 Guldshadt) associated as the Responsible Managing Officer (RMO). The Contractor's License
3 was in full force and effect at all times relevant to the charges brought herein and will expire on
4 April 30, 2027, unless renewed.

5 **PERSONNEL OF RECORD**

6 3. "Members of the personnel of record" of an entity that holds a contractor's license is
7 defined in Business and Professions Code (Code) section 7025 and "means every person listed in
8 the records of the registrar as then associated with a licensee." Respondent Master is a
9 corporation organized under the laws of California, and has listed the following individuals as
10 associated personnel, which are of record with the Board and not named as respondents herein:
11 On or about April 17, 2023, Tatianna Shakhgeldyan associated as Chief Executive Officer and
12 President.

13 **JURISDICTION**

14 4. This Accusation is brought before the Registrar under the authority of the following
15 laws. All section references are to the Business and Professions Code (Code) unless otherwise
16 indicated.

17 5. Code section 118, subdivision (b), states:

18 The suspension, expiration, or forfeiture by operation of law of a license issued
19 by a board in the department, or its suspension, forfeiture, or cancellation by order of
20 the board, shall not, during any period in which it may be renewed, restored, reissued,
21 or reinstated, deprive the board of its authority to institute or continue a disciplinary
22 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.

23 6. Code section 7076.5, subdivision (h), states:

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

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

1 8. Code section 7106.5 states:

2 The expiration, cancellation, forfeiture, revocation, or suspension of a license
3 by operation of law or by order or decision of the registrar or a court of law, or the
4 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.

5 9. Code section 7121.5 states:

6 A person who was the qualifying individual on a revoked license, or of a
7 license under suspension, or of a license that was not renewed while it was under
8 suspension, shall be prohibited from serving as an officer, director, associate, partner,
9 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.

10 **STATUTORY PROVISIONS**

11
12 10. Code section 7027.3 states:

13 Any person, licensed or unlicensed, who willfully and intentionally uses,
14 with intent to defraud, a contractor's license number that does not correspond to
the number on a currently valid contractor's license held by that person, is
15 punishable by a fine not exceeding ten thousand dollars (\$10,000), or by
imprisonment in state prison, or in county jail for not more than one year, or by
16 both that fine and imprisonment. The penalty provided by this section is
cumulative to the penalties available under all other laws of this state. If, upon
17 investigation, the registrar has probable cause to believe that an unlicensed
individual is in violation of this section, the registrar may issue a citation pursuant
18 to Section 7028.7.

19 11. Code section 7030.5 states:

20 Every person licensed pursuant to this chapter shall include his license number
21 in: (a) all construction contracts; (b) subcontracts and calls for bid; and (c) all forms
of advertising, as prescribed by the registrar of contractors, used by such a person.

22 12. Code section 7116 states:

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

25 13. Code section 7117 states:

26 Acting in the capacity of a contractor under any license issued hereunder
27 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
28 license, or as later changed as provided in this chapter, constitutes a cause for
disciplinary action.

14. Code section 7122.5 states:

The performance by an individual, partnership, corporation, limited liability company, firm, or association of an act or omission constituting a cause for disciplinary action, likewise constitutes a cause for disciplinary action against a licensee who at the time that the act or omission occurred was the qualifying individual of that individual, partnership, corporation, limited liability company, firm, or association, whether or not he or she had knowledge of or participated in the prohibited act or omission.

15. Code section 7159 states, in pertinent part:

(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.

(2) This section does not apply to service and repair contracts that are subject to Section 7159.10, if the contract for the applicable services complies with Sections 7159.10 to 7159.14, inclusive.

(3) This section does not apply to the sale, installation, and servicing of a fire alarm sold in conjunction with an alarm system, as defined in Section 7590.1, if all costs attributable to making the fire alarm system operable, including sale and installation costs, do not exceed five hundred dollars (\$500), and the licensee complies with the requirements set forth in Section 7159.9.

(4) This section does not apply to any costs associated with monitoring a burglar or fire alarm system.

(5) Failure by the licensee, their 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.

...

(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:

(1) The name, business address, and license number of the contractor.

(2) If applicable, the name and registration number of the home improvement salesperson that solicited or negotiated the contract.

(3) The following heading on the contract form that identifies the type of contract in at least 10-point boldface type: "Home Improvement."

(4) The following statement in at least 12-point boldface type: "You are entitled to a completely filled in copy of this agreement, signed by both you and the contractor, before any work may be started."

(5) The heading: "Contract Price," followed by the amount of the contract in dollars and cents.

(6) If a finance charge will be charged, the heading: "Finance Charge," followed by the amount in dollars and cents. The finance charge is to be set out separately from the contract amount.

(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 pools, 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.

(8) If a downpayment will be charged, the details of the downpayment shall be expressed in substantially the following form, and shall include the text of the notice as specified in subparagraph (C):

(A) The heading: "Downpayment."

(B) A space where the actual downpayment appears.

(C) The following statement in at least 12-point boldface type:

"THE DOWNPAYMENT MAY NOT EXCEED \$1,000 OR 10 PERCENT OF THE CONTRACT PRICE, WHICHEVER IS LESS."

(9) If payments, other than the downpayment, are to be made before the project is completed, the details of these payments, known as progress payments, shall be expressed in substantially the following form, and shall include the text of the statement as specified in subparagraph (C):

(A) A schedule of progress payments shall be preceded by the heading: "Schedule of Progress Payments."

(B) Each progress payment shall be stated in dollars and cents and specifically reference the amount of work or services to be performed and materials and equipment to be supplied.

1 (C) The section of the contract reserved for the progress payments shall include
2 the following statement in at least 12-point boldface type:

3 "The schedule of progress payments must specifically describe each phase of
4 work, including the type and amount of work or services scheduled to be supplied in
5 each phase, along with the amount of each proposed progress payment. IT IS
6 AGAINST THE LAW FOR A CONTRACTOR TO COLLECT PAYMENT FOR
7 WORK NOT YET COMPLETED, OR FOR MATERIALS NOT YET DELIVERED.
8 HOWEVER, A CONTRACTOR MAY REQUIRE A DOWNPAYMENT."

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

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

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

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

15 (11) The estimated completion date of the work shall be referenced in the
16 contract in substantially the following form:

17 (A) The heading: "Approximate Completion Date."

18 (B) The approximate date of completion.

19 (12) If applicable, the heading: "List of Documents to be Incorporated into the
20 Contract," followed by the list of documents incorporated into the contract.

21 (13) The heading: "Note About Extra Work and Change Orders," followed by
22 the following statement:

23 "Extra Work and Change Orders become part of the contract once the order is
24 prepared in writing and signed by the parties prior to the commencement of work
25 covered by the new change order. The order must describe the scope of the extra
26 work or change, the cost to be added or subtracted from the contract, and the effect
27 the order will have on the schedule of progress payments."

28 ...

16. Code section 7161 states, in pertinent part:

It is a misdemeanor for any person to engage in any of the following acts, the
commission of which shall be cause for disciplinary action against any licensee or
applicant:

(a) Using false, misleading, or deceptive advertising as an inducement to enter
into any contract for a work of improvement, including, but not limited to, any home
improvement contract, whereby any member of the public may be misled or injured.

(b) Making any substantial misrepresentation in the procurement of a contract
for a home improvement or other work of improvement or making any false promise
of a character likely to influence, persuade or, induce any person to enter into the
contract.

1 (c) Any fraud in the execution of, or in the material alteration of, any contract,
2 trust deed, mortgage, promissory note, or other document incident to a home
improvement transaction or other transaction involving a work of improvement.

3 (d) Preparing or accepting any trust deed, mortgage, promissory note, or other
4 evidence of indebtedness upon the obligations of a home improvement transaction or
other transaction for a work of improvement with knowledge that it specifies a greater
5 monetary obligation than the consideration for the improvement work, which
consideration may be a time sale price.

6 (e) Directly or indirectly publishing any advertisement relating to home
7 improvements or other works of improvement which contains an assertion,
representation or statement of fact that is false, deceptive, or misleading, or by any
8 means advertising or purporting to offer to the general public improvement work with
the intent not to accept contracts for the particular work or at the price that is
9 advertised or offered to the public, except that any advertisement that is subject to and
complies with the existing rules, regulations, or guides of the Federal Trade
Commission shall not be deemed false, deceptive, or misleading.

10 ...

11 **COST RECOVERY, RESTITUTION AND OTHER AUTHORITY**

12 17. Code section 125.3 states, in pertinent part:

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

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

18 18. Government Code section 11519 states:

19 (a) The decision shall become effective 30 days after it is delivered or mailed to
20 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
21 granted.

22 (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
23 effective. The stay of execution provided herein may be accompanied by an express
condition that respondent comply with specified terms of probation provided;
24 provided, however, that the terms of probation shall be just as reasonable in light of
the findings and decision.

25 (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
26 become effective.

27 (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
28 of this subdivision, the amount paid shall be credited to any subsequent judgment in a

1 civil action.

2 (e) The person to which the agency action is directed may not be required to
3 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.

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

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

8 19. Code section 143.5, subdivision (b), states:

9 Any board, bureau, or program within the Department of Consumer Affairs that
10 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
11 damages providing for full and final satisfaction of the parties may not require its
12 licensee or licensees to pay any additional sums to the benefit of any plaintiff in the
civil action.

13 20. Code section 7095 states:

14 (a) The decision may:

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

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

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

21 (4)

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

23 (B) Failure to fully comply with the terms and conditions of probation set
24 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
25 subparagraph, the decision shall be considered a disciplinary action within the
meaning of this chapter.

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

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

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

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

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

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

10 21. Code section 7097 states:

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

18 22. Code section 7098 states:

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

24 23. Code section 7102 states:

25 After suspension of a license upon any of the grounds set forth in this chapter
26 [the Contractors' State License Law], the registrar may reinstate the license upon
27 proof of compliance by the contractor with all provisions of the decision as to
28 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.

D.K. PROJECT

24. On or about December 3, 2024, D.K. contacted Respondent Master by telephone based on an advertisement for a \$39.00 water leak detection service. Respondent Master dispatched unlicensed contractor FullServ Restoration (Fullserv) to D.K.'s home in Davis, California, to perform the service (D.K. Project). D.K. was not provided a written contract prior to work being performed on the D.K. Project.

25. Work on the D.K. Project began on or about December 12, 2024, and work was completed on or about December 13, 2024. After work had been performed on the D.K. Project, Respondent Master submitted documents to D.K.'s insurance company, AAA, without D.K.'s permission or knowledge in an effort to receive an inflated payment for services that had not been performed on the D.K. Project. Respondent Master claimed through billing documents to AAA that the work on the D.K. Project had been an emergency, billed \$470.00 to take equipment down, and billed to remove a dryer. However, that work had not been performed on the D.K. Project. In fact, Respondent Master had removed sheetrock in D.K.'s garage and living room, removed copper pipes and replaced them with plastic pipes, and declared to AAA that the leak had come from the washing machine. In fact, AAA later sent out a leak detection company that found that the water leak was a result of pool equipment and had never been located inside the home or garage area. The unnecessary work performed on behalf of Respondent Master required D.K. to submit an insurance claim to AAA for more than the \$39.00 leak detection fee.

26. On or about September 5, 2025, during an interview with a Board investigator, Respondent Guldshadt stated that FullServ is a "doing business as (dba)" of Respondent Master; however, Respondent Master already had a dba registered with the Board in the name of Calmaster Restoration. A Board investigator found an advertisement for FullServ that contained

Respondent Master's contractor's license number. Further, the investigator found a second advertisement for FullServ that failed to contain a contractor's license number.

FIRST CAUSE FOR DISCIPLINE

(Fraudulent Use of a License Number- Respondent Master)

27. Respondent Master has subjected its license to disciplinary action pursuant to Code section 7027.3, in that Respondent Master willfully and intentionally allowed FullServ to use Respondent Master's contractor's license number, as set forth in paragraph 26, incorporated herein.

SECOND CAUSE FOR DISCIPLINE

(Failure to Include License Number on Advertisement- Respondent Master)

28. Respondent Master has subjected its license to disciplinary action pursuant to Code section 7030.5, in that Respondent Master failed to include its contractor's license number on the advertisement for its dba, FullServ, as set forth in paragraph 26, incorporated herein.

THIRD CAUSE FOR DISCIPLINE

(Willful or Fraudulent Act – Respondent Master)

29. Respondent Master has subjected its license to disciplinary action pursuant to Code section 7116, in that on the D.K. Project, Respondent Master willfully or fraudulently caused damage to the interior of D.K.'s home, causing a substantial injury to D.K. as set forth in paragraph 25, incorporated herein.

FOURTH CAUSE FOR DISCIPLINE

(Namestyle Variance- Respondent Master)

30. Respondent Master has subjected its license to disciplinary action pursuant to Code section 7117, subdivision (a), in that Respondent operated in the capacity of a contractor on the D.K. Project using a namestyle different from that in which the license was issued, as set forth in paragraphs 24 through 26, incorporated herein.

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1 **FIFTH CAUSE FOR DISCIPLINE**

2 **(Violation of Home Improvement Contract Form- Respondent Master)**

3 31. Respondent Master has subjected its license to disciplinary action pursuant to Code
4 section 7159, subdivision (d) in that on the D.K. Project, Respondent Master failed to comply
5 with provisions of the law regarding home improvement contracts when Respondent Master did
6 not provide D.K. with a written contract, as set forth in paragraph 24, incorporated herein.

7 **SIXTH CAUSE FOR DISCIPLINE**

8 **(Misleading Advertisement - Respondent Master)**

9 32. Respondent Master has subjected its license to disciplinary action pursuant to Code
10 section 7161, subdivision (a), in that on the D.K. Project, Respondent Master used misleading,
11 false, and deceptive advertising as an inducement for D.K. to enter into a contract for work or
12 improvement, as set forth in paragraphs 24 and 25, incorporated herein.

13 **SEVENTH CAUSE FOR DISCIPLINE**

14 **(Misrepresentation in Obtaining Contract – Respondent Master)**

15 33. Respondent Master has subjected its license to disciplinary action under Code section
16 7161, subdivision (b), in that on the D.K. Project, Respondent Master made substantial
17 misrepresentations to D.K. in the procurement of the contract, as set forth in paragraphs 24 and
18 25, incorporated herein.

19 **EIGHTH CAUSE FOR DISCIPLINE**

20 **(Fraudulent Document- Respondent Master)**

21 34. Respondent Master has subjected its license to disciplinary action pursuant to Code
22 section 7161, subdivision (c), in that Respondent Master submitted fraudulent documentation to
23 AAA in order to obtain payment for services that had not been performed on the D.K. Project, as
24 set forth in paragraph 25, incorporated herein.

25 **NINTH CAUSE FOR DISCIPLINE**

26 **(Preparation of a Fraudulent Document- Respondent Master)**

27 35. Respondent Master has subjected it license to disciplinary action pursuant to Code
28 section 7161, subdivision (d), in that on the D.K. Project, Respondent Master prepared a

1 fraudulent document that quoted a cost that exceeded the value of work, as set forth in paragraph
2 25, incorporated herein.

3 **TENTH CAUSE FOR DISCIPLINE**

4 **(Fraudulent Advertisement- Respondent Master)**

5 36. Respondent Master has subjected its license to disciplinary action pursuant to Code
6 section 7161, subdivision (e), in that Respondent Master advertised for work with the intent to not
7 accept the contract for the work that had been advertised, as set forth in paragraphs 24 and 25,
8 incorporated herein.

9 **O.L. PROJECT**

10 37. On or about December 6, 2024, O.L. contacted Respondent Master by telephone
11 based on an advertisement for a \$39.00 water leak detection service. The advertisement O.L.
12 responded to showed Fullserv as the name of the company. Further the advertisement did not
13 contain a contractor's license number. Respondent Master dispatched unlicensed contractor
14 Fullserv to O.L.'s home in Fair Oaks, California, to perform the service (O.L. Project). O.L. was
15 not provided a written contract prior to work being performed on the O.L. Project. The invoice
16 that was provided to O.L. by Fullserv listed Respondent Master's contractor's license number.

17 38. Work on the O.L. Project began on or about December 9, 2024, and work was
18 completed on or about December 11, 2024. Respondent Master told O.L. to contact his insurance
19 company as the damage was excessive. Respondent Master began to install plastic, tape off areas
20 of the home, and removed drywall prior to an actual inspection to determine the cause of the
21 water leak. After an inspection it was determined that the leak had been caused outside of the
22 home from a valve that needed to be replaced.

23 39. After work had been performed on the O.L. Project, Respondent Master submitted
24 documents to O.L.'s insurance company, Washington Mutual. Respondent Master claimed
25 through billing documents to Washington Mutual that the work on the O.L. Project had been an
26 emergency, billed to apply a microbial agent to the surface of the home, and billed to remove and
27 bag wet insulation. However, that work had not been performed on the O.L. Project. The
28 documents submitted to Washington Mutual showed that the cost to repair the O.L. Project was

1 \$10,714.82; however, the cost was reduced to \$6,699.95 for mitigation purposes. Respondent
2 presented O.L. with a bill for \$700.00 for lead testing of the paint inside of the home; however,
3 there was no evidence that justified the need for lead testing or the removal of drywall when the
4 leak had not been detected. Further, the actual cost for the three lead samples was \$120.00.

5 **ELEVENTH CAUSE FOR DISCIPLINE**

6 **(Fraudulent Use of a License Number- Respondent Master)**

7 40. Respondent Master has subjected its license to disciplinary action pursuant to Code
8 section 7027.3, in that Respondent Master willfully and intentionally allowed FullServ to use
9 Respondent Master's contractor's license number, as set forth in paragraph 37, incorporated
10 herein.

11 **TWELFTH CAUSE FOR DISCIPLINE**

12 **(Failure to Include License Number on Advertisement- Respondent Master)**

13 41. Respondent Master has subjected its license to disciplinary action pursuant to code
14 section 7030.5, in that Respondent Master failed to include its contractors license number on the
15 advertisement for its dba, FullServ, as set forth in paragraph 37, incorporated herein.

16 **THIRTEENTH CAUSE FOR DISCIPLINE**

17 **(Willful or Fraudulent Act – Respondent Master)**

18 42. Respondent Master has subjected its license to disciplinary action pursuant to Code
19 section 7116, in that on the O.L. Project, Respondent Master willfully or fraudulently caused
20 damage to the interior of O.L.'s home, causing a substantial injury to O.L. as set forth in
21 paragraph 38, incorporated herein.

22 **FOURTEENTH CAUSE FOR DISCIPLINE**

23 **(Namestyle Variance- Respondent Master)**

24 43. Respondent Master has subjected its license to disciplinary action pursuant to Code
25 section 7117, subdivision (a), in that Respondent Master operated in the capacity of a contractor
26 on the O.L. Project using a namestyle different from that in which the license was issued, as set
27 forth in paragraphs 37 and 38, incorporated herein.

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1 **FIFTEENTH CAUSE FOR DISCIPLINE**

2 **(Violation of Home Improvement Contract Form- Respondent Master)**

3 44. Respondent Master has subjected its license to disciplinary action pursuant to Code
4 section 7159, subdivision (d) in that on the O.L. Project, Respondent Master failed to comply
5 with provisions of the law regarding home improvement contracts when Respondent Master did
6 not provide D.K. with a written contract, as set forth in paragraph 37, incorporated herein.

7 **SIXTEENTH CAUSE FOR DISCIPLINE**

8 **(Misleading Advertisement - Respondent Master)**

9 45. Respondent Master has subjected its license to disciplinary action pursuant to Code
10 section 7161, subdivision (a), in that on the O.L. Project, Respondent Master used misleading,
11 false, and deceptive advertising as an inducement for O.L. to enter into a contract for work or
12 improvement, as set forth in paragraph 37, incorporated herein.

13 **SEVENTEENTH CAUSE FOR DISCIPLINE**

14 **(Misrepresentation in Obtaining Contract – Respondent Master)**

15 46. Respondent Master has subjected its license to disciplinary action under Code section
16 7161, subdivision (b), in that on the O.L. Project, Respondent Master made substantial
17 misrepresentations to O.L. in the procurement of the contract, as set forth in paragraphs 37 and
18 38, incorporated herein.

19 **EIGHTEENTH CAUSE FOR DISCIPLINE**

20 **(Fraudulent Document- Respondent Master)**

21 47. Respondent Master has subjected its license to disciplinary action pursuant to Code
22 section 7161, subdivision (c), in that Respondent Master submitted fraudulent documentation to
23 Washington Mutual in order to obtain payment for services that when not performed on the O.L.
24 Project, as set forth in paragraph 38, incorporated herein.

25 **NINETEENTH CAUSE FOR DISCIPLINE**

26 **(Preparation of a Fraudulent Document- Respondent Master)**

27 48. Respondent Master has subjected it license to disciplinary action pursuant to Code
28 section 7161, subdivision (d), in that on the O.L. Project, Respondent Master prepared a

1 fraudulent document that quoted a cost that exceeded the value of work, as set forth in paragraph
2 38, incorporated herein.

3 **TWENTIETH CAUSE FOR DISCIPLINE**

4 **(Fraudulent Advertisement- Respondent Master)**

5 49. Respondent Master has subjected its license to disciplinary action pursuant to Code
6 section 7161, subdivision (e), in that Respondent Master advertised for work with the intent to not
7 accept the contract for the work that had been advertised, as set forth in paragraphs 37 through 39,
8 incorporated herein.

9 **CAUSES FOR OTHER ACTION**

10 **(Restrictions on Qualifier – Aleksander Yefim Guldshadt)**

11 50. Pursuant to Code section 7121.5, if License Number 1103646, issued to Respondent
12 Master is revoked or suspended, Aleksander Yefim Guldshadt shall be prohibited from serving
13 as an officer, director, associate, partner, manager, or qualifying individual of a licensee during
14 the time the discipline is imposed, whether or not he had knowledge of or participated in the acts
15 or omissions constituting grounds for discipline as alleged in the causes for discipline, above, and
16 any licensee which employs, elects, or associates Aleksander Yefim Guldshadt other than as a
17 bona fide nonsupervising employee shall be subject to disciplinary action.

18 **PRAYER**

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

21 1. Ordering the revocation or suspension of Contractor's License Number 1103646
22 issued to Master Plumber Company, doing business as Fullserv Restoration, pursuant to Code
23 section 7090;

24 2. Ordering restitution of all damages according to proof suffered by D.K. and O.L., as a
25 condition of probation in the event probation is ordered for Respondent Master Plumber
26 Company, doing business as Fullserv Restoration, pursuant to Government Code section 11519,
27 subdivision (d);

28 ///

1 3. If revocation of Contractor's License Number 1103649, issued to Master Plumber
2 Company, doing business as Fullserv Restoration, is ordered, an order for restitution of all
3 damages suffered by D.K. and O.L. as a result of Master Plumber Company, doing business as
4 Fullserv Restoration's conduct as a contractor, as a condition precedent to any future restoration
5 of Contractor's License Number 1103649, or before any new license is issued;

6 4. Ordering Respondent Master Plumber Company, doing business as Fullserv
7 Restoration, to pay the Registrar costs for the investigation and enforcement of the case according
8 to proof at the hearing, pursuant to Code section 125.3;

9 5. Ordering Respondent Master Plumber Company, doing business as Fullserv
10 Restoration, to provide the Registrar with a listing of all contracting projects in progress and the
11 anticipated completion date of each, pursuant to Code section 7095;

12 6. Ordering that Respondent Aleksander Yefim Guldshadt is prohibited from serving as
13 an officer, director, associate, partner, manager or qualifying individual of a licensee, pursuant to
14 Code section 7121.5; and,

15 7. Taking such other and further action deemed proper.

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18 DATED: 3/10/2026

Brian Melvin

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

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