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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. N2025-168

14 **PALMETTO SOLAR LLC, DBA**
15 **LIGHTREACH, RUSSELL PHILLIP**
16 **KILL, RME, C. CHRISTOPHER**
17 **KEMPER, MANAGER**
18 **1616 Camden Road, Ste. 300**
19 **Charlotte, NC 28203**

ACCUSATION

20 **Contractor's License No. 1048921, B, C10**

21 Respondent.

22 **PARTIES**

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

26 2. On or about January 14, 2019, the Registrar of Contractors (Registrar) issued
27 Contractor's License Number 1048921, B (General Building), C10 (Electrical), to Palmetto Solar
28 LLC, dba Palmetto Solar Electric, Russell Phillip Kill, RME, C. Christopher Kemper, Manager
(Respondent Palmetto Solar). On or about November 10, 2025, Respondent Palmetto Solar's
registered business name with the Board was changed to LightReach. The Contractor's License

1 was in full force and effect at all times relevant to the charges brought herein and will expire on
2 January 31, 2027, unless renewed.

3 **JURISDICTION**

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

7 4. Section 118, subdivision (b), of the Code, states:

8 The suspension, expiration, or forfeiture by operation of law of a license issued
9 by a board in the department, or its suspension, forfeiture, or cancellation by order of
10 the board or by order of a court of law, or its surrender without the written consent of
11 the board, shall not, during any period in which it may be renewed, restored, reissued,
12 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.

13 5. Section 7076.5, subdivision (h), of the Code states:

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

16 6. Section 7090 of the Code provides, in pertinent part, that the Registrar may suspend
17 or revoke any license or registration if the licensee or registrant is guilty of or commits any one or
18 more of the acts or omissions constituting cause for disciplinary action.

19 7. Section 7106.5 of the Code states:

20 The expiration, cancellation, forfeiture, revocation, or suspension of a license
21 by operation of law or by order or decision of the registrar or a court of law, or the
22 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.

23 8. Section 7121 of the Code states:

24 A person who has been denied a license for a reason other than failure to
25 document sufficient satisfactory experience for a supplemental classification for an
existing license, or who has had his or her license revoked, or whose license is under
26 suspension, or who has failed to renew his or her license while it was under
27 suspension, or who has been a partner, officer, director, manager, or associate of any
partnership, corporation, limited liability company, firm, or association whose
28 application for a license has been denied for a reason other than failure to document
sufficient satisfactory experience for a supplemental classification for an existing
license, or whose license has been revoked, or whose license is under suspension, or
who has failed to renew a license while it was under suspension, and while acting as a

partner, officer, director, manager, or associate had knowledge of or participated in any of the prohibited acts for which the license was denied, suspended, or revoked, shall be prohibited from serving as an officer, director, associate, partner, manager, qualifying individual, or member of the personnel of record of a licensee, and the employment, election, or association of this type of person by a licensee in any capacity other than as a nonsupervising bona fide employee shall constitute grounds for disciplinary action.

9. Section 7121.5 of the Code 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

10. Section 7029.1 of the Code states, in pertinent part:

(a) Except as provided in this section, it is unlawful for any two or more licensees, each of whom has been issued a license to act separately in the capacity of a contractor within this state, to be awarded a contract jointly or otherwise act as a contractor without first having secured a joint venture license in accordance with the provisions of this chapter.

...

(c) A violation of this section constitutes a cause for disciplinary action.

11. Section 7107 of the Code 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.

12. Section 7109 of the Code 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.

(b) A willful departure from or disregard of plans or specifications in any material respect, which is prejudicial to another, without the consent of the owner or his or her duly authorized representative and without the consent of the person entitled to have the particular construction project or operation completed in accordance with such plans or specifications, constitutes a cause for disciplinary action.

13. Section 7110 of the Code states:

Willful or deliberate disregard and violation of the building laws of the state, or of any political subdivision thereof, or of any of the following references to or

provisions of law, constitutes a cause for disciplinary action against a licensee:

(a) Section 8550 or 8556.

(b) Sections 1689.5 to 1689.15, inclusive, of the Civil Code.

(c) The safety laws or labor laws or compensation insurance laws or Unemployment Insurance Code of the state.

(d) The Subletting and Subcontracting Fair Practices Act (Chapter 4 (commencing with Section 4100) of Part 1 of Division 2 of the Public Contract Code).

(e) Any provision of the Health and Safety Code or Water Code, relating to the digging, boring, or drilling of water wells.

(f) Any provision of Article 2 (commencing with Section 4216) of Chapter 3.1 of Division 5 of Title 1 of the Government Code.

(g) Section 374.3 of the Penal Code or any substantially similar law or ordinance that is promulgated by a local government agency as defined in Section 82041 of the Government Code.

(h) Any state or local law relating to the issuance of building permits.

14. Section 7116 of the Code states:

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

15. Section 7117 of the Code 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.

16. Section 7118 of the Code states:

Entering into a contract with a contractor while such contractor is not licensed as provided in this chapter constitutes a cause for disciplinary action.

17. Section 7154 of the Code states:

(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

1 ceases to be employed by the contractor. This notification requirement shall include,
2 but not be limited to, the name and registration number of the home improvement
3 salesperson who had been employed by the contractor. The form shall be submitted
4 within 90 days after the home improvement salesperson ceases to be employed by the
5 contractor.

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

10 (d) A home improvement contractor who employs a person to sell home
11 improvement contracts while that person is not registered by the registrar as a home
12 improvement salesperson as provided in this article, is subject to disciplinary action
13 by the registrar.

14 18. Section 7159 of the Code states:

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

18 (2) This section does not apply to service and repair contracts that are subject to
19 Section 7159.10, if the contract for the applicable services complies with Sections
20 7159.10 to 7159.14, inclusive.

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

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

28 (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.

...

(e) Except as provided in paragraph (8) of subdivision (a) of Section 7159.5, all
of the following notices shall be provided to the owner as part of the contract form as
specified or, if otherwise authorized under this subdivision, may be provided as an
attachment to the contract:

...

(6)(A) The notice set forth in subparagraph (B) and entitled "Three-Day Right
to Cancel," shall be provided to the buyer unless the contract is:

(i) Negotiated at the contractor's place of business.

(ii) Subject to the "Seven-Day Right to Cancel," as set forth in paragraph (7).

1 (iii) Subject to licensure under the Alarm Company Act (Chapter 11.6
2 (commencing with Section 7590)), provided the alarm company licensee complies
3 with Sections 1689.5, 1689.6, and 1689.7 of the Civil Code, as applicable.

4 (B) (i) "Three-Day Right to Cancel

5 You, the buyer, have the right to cancel this contract within three business days.
6 You may cancel by emailing, mailing, faxing, or delivering a written notice to the
7 contractor at the contractor's place of business by midnight of the third business day
8 after you received a signed and dated copy of the contract that includes this notice.
9 Include your name, your address, and the date you received the signed copy of the
10 contract and this notice.

11 If you cancel, the contractor must return to you anything you paid within 10
12 days of receiving the notice of cancellation. For your part, you must make available to
13 the contractor at your residence, in substantially as good condition as you received
14 them, goods delivered to you under this contract or sale. Or, you may, if you wish,
15 comply with the contractor's instructions on how to return the goods at the
16 contractor's expense and risk. If you do make the goods available to the contractor
17 and the contractor does not pick them up within 20 days of the date of your notice of
18 cancellation, you may keep them without any further obligation. If you fail to make
19 the goods available to the contractor, or if you agree to return the goods to the
20 contractor and fail to do so, then you remain liable for performance of all obligations
21 under the contract."

22 (ii) References to "three" and "third" in the notice set forth in clause (i) shall be
23 changed to "five" and "fifth," respectively, for a buyer who is a senior citizen.

24 (C) The notice required by this paragraph shall comply with all of the
25 following:

26 (i) The text of the notice is at least 12-point boldface type.

27 (ii) The notice is in immediate proximity to a space reserved for the owner's
28 signature.

(iii) The owner acknowledges receipt of the notice by signing and dating the
notice form in the signature space.

(iv) The notice is written in the same language, e.g., Spanish, as that principally
used in any oral sales presentation.

(v) The notice may be attached to the contract if the contract includes, in at least
12-point boldface type, a checkbox with one of the following statements, as
applicable:

(I) For a contract with a senior citizen: "The law requires that the contractor
give you a notice explaining your right to cancel. Initial the checkbox if the contractor
has given you a 'Notice of the Five-Day Right to Cancel.'"

(II) For all other contracts: "The law requires that the contractor give you a
notice explaining your right to cancel. Initial the checkbox if the contractor has given
you a 'Notice of the Three-Day Right to Cancel.'"

(vi) (1) The notice shall be accompanied by a completed form in duplicate,
captioned "Notice of Cancellation," which also shall be attached to the agreement or
offer to purchase and be easily detachable, and which shall contain the following

statement written in the same language, e.g., Spanish, as used in the contract:

“Notice of Cancellation”

/enter date of transaction/

(Date)

“You may cancel this transaction, without any penalty or obligation, within three business days from the above date.

If you cancel, any property traded in, any payments made by you under the contract or sale, and any negotiable instrument executed by you will be returned within 10 days following receipt by the seller of your cancellation notice, and any security interest arising out of the transaction will be canceled.

If you cancel, you must make available to the seller at your residence, in substantially as good condition as when received, any goods delivered to you under this contract or sale, or you may, if you wish, comply with the instructions of the seller regarding the return shipment of the goods at the seller’s expense and risk.

If you do make the goods available to the seller and the seller does not pick them up within 20 days of the date of your notice of cancellation, you may retain or dispose of the goods without any further obligation. If you fail to make the goods available to the seller, or if you agree to return the goods to the seller and fail to do so, then you remain liable for performance of all obligations under the contract.”

To cancel this transaction, mail or deliver a signed and dated copy of this cancellation notice, or any other written notice, or send a telegram to

/name of seller/,

at

/address of seller’s place of business/

not later than midnight of

(Date).

I hereby cancel this transaction.

(Date)

(Buyer’s signature)

(II) The reference to “three” in the statement set forth in subclause (I) shall be changed to “five” for a buyer who is a senior citizen.

19. Section 7161 of the Code states, in pertinent part:

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

2 20. Section 125.3 of the Code states, in pertinent part:

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

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

11 . . .

12 21. Section 11519 of the Government Code states:

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

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

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

26 (d) As used in subdivision (b), specified terms of probation may include an
27 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
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.

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22. Section 143.5, subdivision (b), of the Code 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.

23. Section 7095 of the Code 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.

1 24. Section 7097 of the Code states:

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

9 25. Section 7098 of the Code states:

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

15 26. Section 7102 of the Code states:

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

21 After revocation of a license upon any of the grounds set forth in this chapter,
22 the license shall not be reinstated or reissued and a license shall not be issued to any
23 member of the personnel of the revoked licensee found to have had knowledge of or
24 participated in the acts or omissions constituting grounds for revocation, within a
25 minimum period of one year and a maximum period of five years after the final
26 decision of revocation and then only on proper showing that all loss caused by the act
27 or omission for which the license was revoked has been fully satisfied and that all
28 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.

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1 **DESCANSO DRIVE PROJECT**

2 27. In or about January 2, 2024, Respondent Palmetto Solar, through home improvement
3 salesman (HIS) Calvin Jaouhari entered into a written contract with homeowners W.B. and J.B.
4 under the name of LightReach¹ with Bryton Power, license no. 826729, as the installer. Though
5 the contract listed both Respondent and Bryton Power's license numbers, it did not list a joint
6 venture license number. The contract was for a twenty-five-year power purchase agreement that
7 included the installation of a solar panel system, a backup battery system, and roof repairs to the
8 property located at 1533 Descanso Drive in La Canada Flintridge, CA for the total Predictable
9 Payments amount of \$117,116.88 (Descanso Drive Project). On or about December 12, 2023,
10 Michael Espinosa (an individual not licensed by the Board) began work on the homeowners' roof.
11 Afterwards, a solar company installed twenty-seven solar panels and the backup battery system.
12 Work ceased on or about January 15, 2024, but the roof began leaking after it rained in March of
13 2024 and Respondent never fixed the leaks in the roof and never completed installation of the
14 solar panel and backup battery systems such that they could be activated. On or around July 1,
15 2025 an industry expert inspected the property and estimated the cost to correct Respondent's
16 work and complete the project in accordance with the underlying contract to be approximately
17 \$37,594.00.

18 **FIRST CAUSE FOR DISCIPLINE**

19 **(Abandonment)**

20 28. Respondent Palmetto Solar has subjected its license to disciplinary action under
21 section 7107, in that on Descanso Drive Project, Respondent abandoned the project without legal
22 excuse, failing to complete the construction as follows:

- 23 a. Respondent failed to complete the solar panel system.
24 b. Respondent failed to complete the backup battery system.

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28 ¹ The homeowners believed they were entering into a contract with an entity called Green Day Power.

1 **SECOND CAUSE FOR DISCIPLINE**

2 **(Departure From Trade Standards)**

3 29. Respondent's contractor's license is subject to disciplinary action under Code section
4 7109(a) in that Respondent willfully departed in a material respect from accepted trade standards
5 for good and workmanlike construction on Descanso Drive project, as follows:

- 6 a. Respondent left approximately one-hundred nails protruding up through the
7 homeowners' roof shingles.
- 8 b. Respondent used pieces of cut shingle material in lieu of standard ridge cap material
9 to cover the peaks of approximately ninety-six linear feet of roofline.
- 10 c. Respondent failed to use metal flash/counter flash around the perimeter of the
11 chimney.
- 12 d. Respondent failed to install roof to wall metal flashing leaving naked wood visible.
- 13 e. Respondent failed to use metal step-flash in skylight.
- 14 f. Respondent failed to use plastic cement around perimeter sides or silicone caulking
15 on top of skylight.
- 16 g. Respondent failed to weatherproof the plumbing pipe vent with plastic roof cement.
- 17 h. Respondent failed to weatherproof several heater vents with plastic roof cement.
- 18 i. Respondent failed to install metal storm collars around base of vent/jack transition.
- 19 j. Respondent failed to paint lower parts of heater vents with protective roof paint.
- 20 k. Respondent failed to place shingles beneath satellite bolting assembly.
- 21 l. Respondent failed to properly install shingles three inches from the center of metal
22 valley leaving metal valley channel open wide.

23 **THIRD CAUSE FOR DISCIPLINE**

24 **(Building Law Violation - No Building Permit)**

25 30. Respondent is subject to disciplinary action under section 7110, in that on the
26 Descanso Drive Project, Respondent willfully or deliberately disregarded and violated building
27 codes when he failed to obtain required permit approvals prior to commencement of work as
28 required by the building code.

1 **FOURTH CAUSE FOR DISCIPLINE**

2 **(Willful and/or Fraudulent Act)**

3 31. Respondent is subject to disciplinary action under section 7116, in that on the
4 Descanso Drive Project, Respondent committed willful and / or fraudulent acts when it hired an
5 unlicensed contractor to repair the roof which caused substantial injury to the homeowners.
6 Complainant refers to and by this reference incorporates the allegations set forth above in
7 paragraph 27, as though set forth fully.

8 **FIFTH CAUSE FOR DISCIPLINE**

9 **(Namestyle Variance From License)**

10 32. Respondent is subject to disciplinary action under section 7117, subdivision (a), in
11 that on the Descanso Drive Project, Respondent used in its contract an alternative business name
12 of "LightReach." Complainant refers to and by this reference incorporates the allegations set forth
13 above in paragraph 27, as though set forth fully.

14 **SIXTH CAUSE FOR DISCIPLINE**

15 **(Acting as Join Venture without a Joint Venture License)**

16 33. Respondent is subject to disciplinary action under section 7029.1, in that on the
17 Descanso Drive Project, Respondent acted as a joint venture with Bryton Power, license no.
18 826729, without a joint venture license as required. Complainant refers to and by this reference
19 incorporates the allegations set forth above in paragraph 27, as though set forth fully.

20 **SEVENTH CAUSE FOR DISCIPLINE**

21 **(Contracting with an Unlicensed Contractor)**

22 34. Respondent is subject to disciplinary action under section 7118, in that on the
23 Descanso Drive Project, Respondent entered into a contract with an unlicensed contractor,
24 Michael Espinosa. Complainant refers to and by this reference incorporates the allegations set
25 forth above in paragraph 27, as though set forth fully.

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1 **EIGHTH CAUSE FOR DISCIPLINE**

2 **(Employment of Unregistered Home Improvement Salesperson)**

3 35. Respondent is subject to disciplinary action under section 7154, subdivision (c), in
4 that on the Descanso Drive Project, Respondent failed to report employment of a registered home
5 improvement salesperson (HIS), Calvin Jaouhari. Complainant refers to and by this reference
6 incorporates the allegations set forth above in paragraph 27, as though set forth fully.

7 **NINTH CAUSE FOR DISCIPLINE**

8 **(Violations of Home Improvement Contract Form Requirements)**

9 36. Respondent is subject to disciplinary action under section 7159, in that on the
10 Descanso Drive Project, Respondent violated home improvement contract drafting requirements,
11 as set out in section 7159(e)(6)(A) to (e)(6)(C) by failing to properly provide the homeowners
12 with notice of the “Three-Day Right to Cancel” or “Five-Day Right to Cancel” for a contract with
13 a senior citizen inclusive of the format and language required by the statute.

14 **ACOMA AVENUE PROJECT**

15 37. In or about March 20, 2024, Respondent Palmetto Solar, through home improvement
16 salesman (HIS) Riccardo Ricci entered into a written contract with homeowner R.R. under the
17 name of LightReach, with Bryton Power, license no. 826729, as the installer. Though the contract
18 listed both Respondent and Bryton Power’s license numbers, it did not list a joint venture license
19 number. HIS Riccardo Ricci was not registered with Respondent or Bryton Power at the time of
20 the contract. The contract was for a twenty-five-year power purchase agreement for the
21 installation of a 5.53 kilowatts solar panel system at the property located at 66425 Acoma Avenue
22 in Desert Hot Springs, CA for the total Predictable Payments amount of \$85,146.60 (Acoma
23 Avenue Project). HIS Riccardo Ricci told R.R. that there was a government program for solar that
24 would cover all costs for solar installation and she would not have to pay anything, assuring R. R.
25 that the solar system was completely free of charge and financing was not needed.

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1 **TENTH CAUSE FOR DISCIPLINE**

2 **(Namestyle Variance From License)**

3 38. Respondent is subject to disciplinary action under section 7117, subdivision (a), in
4 that on the Acoma Avenue Project, Respondent used in its contract an alternative business name
5 of "LightReach." Complainant refers to and by this reference incorporates the allegations set forth
6 above in paragraph 37, as though set forth fully.

7 **ELEVENTH CAUSE FOR DISCIPLINE**

8 **(Acting as Join Venture without a Joint Venture License)**

9 39. Respondent is subject to disciplinary action under section 7029.1, in that on the
10 Acoma Avenue Project, Respondent acted as a joint venture with Bryton Power, license no.
11 826729, without a joint venture license. Complainant refers to and by this reference incorporates
12 the allegations set forth above in paragraph 37, as though set forth fully.

13 **TWELFTH CAUSE FOR DISCIPLINE**

14 **(Employment of Unregistered Home Improvement Salesperson)**

15 40. Respondent is subject to disciplinary action under section 7154, subdivision (c), in
16 that on the Acoma Avenue Project, Respondent failed to report employment of a registered home
17 improvement salesperson (HIS), Riccardo Ricci. Complainant refers to and by this reference
18 incorporates the allegations set forth above in paragraph 37, as though set forth fully.

19 **THIRTEENTH CAUSE FOR DISCIPLINE**

20 **(Misrepresentation in the Procurement of a Contract)**

21 41. Respondent is subject to disciplinary action under section 7161, subdivision (b), in
22 that on the Acoma Avenue Project, Respondent, through its HIS Riccardo Ricci, made a
23 substantial misrepresentation in the procurement of the contract with R.R. Complainant refers to
24 and by this reference incorporates the allegations set forth above in paragraph 37, as though set
25 forth fully.

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1 **CAUSES FOR OTHER ACTION**

2 **FIRST CAUSE FOR OTHER ACTION**

3 **(Restrictions on Qualifier – Respondent Russell Phillip Kill, RME)**

4 42. Pursuant to Code section 7121.5, if license number 1048921, issued to Respondent
5 PALMETTO SOLAR LLC is revoked or suspended, Respondent Russell Phillip Kill, RME shall
6 be prohibited from serving as an officer, director, associate, partner, manager, or qualifying
7 individual of a licensee during the time the discipline is imposed, whether or not he had
8 knowledge of or participated in the acts or omissions constituting grounds for discipline as
9 alleged in the causes for discipline, above, and any licensee which employs, elects, or associates
10 Respondent Russell Phillip Kill, RME other than as a bona fide nonsupervising employee shall be
11 subject to disciplinary action.

12 **SECOND CAUSE FOR OTHER ACTION**

13 **(Restrictions on Officer - Respondent C. Christopher Kemper)**

14 43. Pursuant to Code section 7121, if license number 1048921, issued to Respondent
15 PALMETTO SOLAR LLC is revoked or suspended, Respondent C. Christopher Kemper shall be
16 prohibited from serving as an officer, director, associate, partner, manager, qualifying individual,
17 or member of the personnel of record of a licensee in that, while serving as Officer of Respondent
18 PALMETTO SOLAR LLC, he had knowledge of or participated in the acts or omissions
19 constituting grounds for discipline as alleged in the causes for discipline, above.

20 **PRAYER**

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

23 1. Ordering the revocation or suspension of Contractor's License Number 1048921
24 issued to Palmetto Solar LLC, dba Lightreach, pursuant to Code section 7090;

25 2. Ordering restitution of all damages according to proof suffered by W.B. and J.B., as a
26 condition of probation in the event probation is ordered for Respondent Palmetto Solar LLC, dba
27 Lightreach and/or Russell Phillip Kill, RME and/or C. Christopher Kemper, Manager pursuant to
28 Government Code section 11519, subdivision (d);

1 3. If revocation of Contractor's License Number 1048921, B, C10, issued to Palmetto
2 Solar LLC, dba Lightreach, is ordered, an order for restitution of all damages suffered by W.B.
3 and J.B. as a result of Respondent Palmetto Solar LLC, dba Lightreach and/or Russell Phillip
4 Kill, RME and/or C. Christopher Kemper, Manager conduct as a contractor, as a condition
5 precedent to any future restoration of Contractor's License Number 1048921, B, C10, or before
6 any new license is issued;

7 4. Ordering Respondent Palmetto Solar LLC, dba Lightreach and/or Russell Phillip Kill,
8 RME and/or C. Christopher Kemper, Manager to pay the Registrar costs for the investigation and
9 enforcement of the case according to proof at the hearing, pursuant to Code section 125.3;

10 5. Ordering Respondent Palmetto Solar LLC, dba Lightreach and/or Russell Phillip Kill,
11 RME and/or C. Christopher Kemper, Manager to provide the Registrar with a listing of all
12 contracting projects in progress and the anticipated completion date of each, pursuant to Code
13 section 7095;

14 6. Ordering that Respondent Russell Phillip Kill, RME is prohibited from serving as an
15 officer, director, associate, partner, manager or qualifying individual of a licensee, pursuant to
16 Code section 7121.5;

17 7. Ordering that Respondent C. Christopher Kemper, Manger is prohibited from serving as
18 an officer, director, associate, partner, manager or qualifying individual of a licensee, pursuant to
19 Code section 7121;

20 8. Taking such other and further action deemed proper.

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23 DATED: 7/21/2026

Brian Melvin

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

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