ROB BONTA
Attorney General of California
CHAR SACHSON
Supervising Deputy Attorney General
JOSHUA D. JOHNSON
Deputy Attorney General
State Bar No. 244774
455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102-7004
Telephone: (415) 510-3876
Facsimile: (415) 703-1107
E-mail: Joshua.Johnson@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**:** **ALL BAY INSULATION & HVAC INC DBA ALL BAY BUILDERS PERFORMANCE; NOAM YAAKOBI, ROY SCOT JONES; OLGA DOTTER** **149 Commonwealth Dr, #1090** **Menlo Park, CA 94025** **Contractor License No. 1042837, B, C2, C20** **ROY SCOT JONES, SOLE OWNER** **9187 Clairemont Mesa Blvd, Ste 6-341** **San Diego, CA 92123** **Contractor License No. 625230, C20** **OLGA DOTTER DBA LUX LIVING CONSTRUCTION** **4070 Laguna Ave** **Oakland, CA 94602** **Contractor License No. 1102278, B** **NOAM YAAKOBI** **41060 High Street, Suite H** **Fremont, CA 94538** **Home Improvement Salesperson** **Registration No. 133533 SP** Respondents.	Case No. N2025-267 **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 or about August 18, 2018, the Registrar of Contractors (Registrar) issued Contractor License Number 1042837, in classifications B (General Building), C-2 (Insulation and Acoustical), and C20 (Warm-Air Heating, Ventilating and Air-Conditioning), to All Bay Insulation & HVAC Inc doing business as All Bay Builders Performance (Respondent All Bay). At all times relevant herein, Noam Yaakobi (Respondent Yaakobi) was the Responsible Managing Officer (RMO) for classification C-2, Chief Executive Officer (CEO), and President. Roy Scot Jones (Respondent Jones) associated as the RMO for classification C20 on about May 27, 2020, and disassociated on or about June 26, 2025. Olga Dotter (Respondent Dotter) associated as the RMO for classification B on or about April 5, 2023, and disassociated on or about May 21, 2024. The Contractor License was in full force and effect at all times relevant to the charges brought herein and will expire on August 31, 2026, unless renewed.

3. On or about August 19, 1991, the Registrar issued Contractor License Number 625230, in classification C20 (Warm-Air Heating, Ventilating and Air-Conditioning), to Roy Scot Jones, sole owner (Respondent Jones). The Contractor License expired on December 31, 2025, and has not been renewed.

4. On or about March 9, 2023, the Registrar issued Contractor License Number 1102278, in classifications B (General Building), to Olga Dotter doing business as Lux Living Construction (Respondent Dotter). The Contractor License was in full force and effect at all times relevant to the charges brought herein and will expire on March 31, 2027, unless renewed.

5. On or about September 14, 2021, the Registrar issued Home Improvement Salesperson Registration Number 133533 SP to Noam Yaakobi (Respondent Yaakobi). The Home Improvement Salesperson Registration expired on September 30, 2023, and has not been renewed.

JURISDICTION

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

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

8. Section 7076.5, subdivision (h), of the Code 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.

9. Section 7090 of the Code 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.

10. Section 7106.5 of the Code 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.

11. Section 7121 of the Code states:

> A person who has been denied a license for a reason other than failure to 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 suspension, or who has failed to renew his or her license while it was under suspension, or who has been a partner, officer, director, manager, or associate of any partnership, corporation, limited liability company, firm, or association whose 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.

12. 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

13. Section 7068.1 of the Code states:

The person qualifying on behalf of an individual or firm under paragraph (1), (2), (3), or (4) of subdivision (b) of Section 7068 shall be responsible for exercising supervision and control of their employer's or principal's construction operations to secure compliance with this chapter and the rules and regulations of the board. This person shall not act in the capacity of the qualifying person for an additional individual or firm unless one of the following conditions exists:

(1) There is a common ownership of at least 20 percent of the equity of each individual or firm for which the person acts in a qualifying capacity.

(2) The additional firm is a subsidiary of or a joint venture with the first. "Subsidiary," as used in this subdivision, means any firm at least 20 percent of the equity of which is owned by the other firm.

(3) With respect to a firm under paragraph (2), (3), or (4) of subdivision (b) of Section 7068, the majority of the partners, officers, or managers are the same.

(b) Notwithstanding paragraphs (1) to (3), inclusive, of subdivision (a), a qualifying individual may act as the qualifier for no more than three firms in any one-year period.

(c) The following definitions shall apply for purposes of this section:

(1) "Firm" means a partnership, a limited partnership, a corporation, a limited liability company, or any other combination or organization described in Section 7068.

(2) "Person" is limited to natural persons, notwithstanding the definition of "person" in Section 7025.

(3) "Supervision and control" means direct supervision or control or monitoring and being available to assist others to whom direct supervision and control has been delegated.

(4)"Direct supervision or control" means any of the following:

(A) Supervising construction operations.

(B) Managing construction activities by making technical and administrative

decisions.

(C) Checking jobs for proper workmanship.

(D) Supervision on construction sites.

(d) The board shall require every applicant or licensee qualifying by the appearance of a qualifying individual to submit detailed information on the qualifying individual's duties and responsibilities for supervision and control of the applicant's construction operations.

(e) Violation of this section shall constitute a cause for disciplinary action and shall be punishable as a misdemeanor by imprisonment in a county jail not to exceed six months, by a fine of not less than three thousand dollars ($3,000), but not to exceed five thousand dollars ($5,000), or by both the fine and imprisonment.

14. Section 7114, subdivision (a), of the Code states:

Aiding or abetting an unlicensed person to evade the provisions of this chapter or combining or conspiring with an unlicensed person, or allowing one's license to be used by an unlicensed person, or acting as agent or partner or associate, or otherwise, of an unlicensed person with the intent to evade the provisions of this chapter constitutes a cause for disciplinary action.

15. Section 7122.5 of the Code 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.

16. Section 7159.5 of the Code states in relevant part:

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:

…

(5) Except for a downpayment, the contractor shall neither request nor accept payment that exceeds the value of the work performed or material delivered. The prohibition prescribed by this paragraph extends to advance payment in whole or in part from any lender or financier for the performance or sale of home improvement goods or services.

…

COST RECOVERY, RESTITUTION AND OTHER AUTHORITY

17. Section 125.3 of the Code 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.

. . .

18. 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.

19. 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.

20. 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.

21. Section 7097 of the Code 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.

22. Section 7098 of the Code 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.

23. Section 7102 of the Code 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.

BRIARWOOD DRIVE PROJECT

24. On or about July 28, 2023, Respondent All Bay entered into a written agreement with HK and FM to remodel and landscape HK and FM's residence on Briarwood Drive in Santa Clara, California for $211,568.74 (Briarwood Drive Project).

25. The contract header refers to "All Bay Builders Performance / Meni Peretz Venture Inc." Meni Peretz is not an officer of Respondent All Bay and is not a licensed contractor in the state of California. Meni Peretz participated with Respondent Yaakobi in providing and overseeing the bid for the Briarwood Drive Project, arranged for and set up work schedules for subcontractors, and maintained oversight of the Briarwood Drive Project.

26. Respondent All Bay began work on the Briarwood Drive Project on or about August 17, 2023. Respondent All Bay's work ended on or about June 25, 2024, after it was terminated from the Briarwood Drive Project.

27. Meni Peretz doing business as Respondent All Bay requested and received a total of $194,524.39. Meni Peretz directed HK and FM to make payments to Meni Peretz, Victoria Design Services Inc., Meni Peretz Venture Inc, and All Bay Insulation, as indicated.

28. On or about June 25, 2024, at HK's request, Respondent All Bay refunded HK $6,000.00 after Respondent All Bay requested and received payment for work it failed to perform.

29. Respondents Yaakobi, Jones, and Dotter were aware of Meni Peretz's supervision and oversight on the Briarwood Drive Project but did not maintain direct control and supervision over the Briarwood Drive Project.

30. HK and MF obtained a bid from a correcting contractor to remove and correct Meni Peretz doing business as Respondent All Bay's work for $98,600.00, paid for a $370 plumbing inspection, and $3,000.00 for landscaping, for a total cost to correct of $103,000.00.

FIRST CAUSE FOR DISCIPLINE

(Failure of RMO to Supervise and Control Construction Operations)

31. Respondent All Bay has subjected its license to disciplinary action under Code section 7068.1, in that Respondent All Bay did not exercise direct supervision and control of operations on the Briarwood Drive Project, as set forth above.

///

SECOND CAUSE FOR DISCIPLINE

(Aided and Abetted Unlicensed Person)

32. Respondent All Bay has subjected its license to disciplinary action under Code section 7114, in that Respondent All Bay aided and/or abetted Meni Peretz, an unlicensed person, to evade the provisions of the Contractors' State License Law, and/or allowed its license to be used by Meni Peretz to perform the contract on the Briarwood Drive Project, and/or acted as an agent or partner or associate of Meni Peretz with the intent to evade the Contractors' State License Law, as set forth above.

THIRD CAUSE FOR DISCIPLINE

(Excessive Payment)

33. Respondent All Bay has subjected its license to disciplinary action under Code section 7159.5, subdivision (a)(5), in that on the Briarwood Drive Project, Respondent All Bay requested or received payments that exceeded the value of the work performed or materials delivered, as set forth above.

FOURTH CAUSE FOR DISCIPLINE

(Cause for Discipline for Qualifier – Respondent Noam Yaakobi)

34. Pursuant to section 7122.5 of the Code, the causes for discipline established as to Respondent All Bay constitute cause for discipline against Respondent Noam Yaakobi, under Home Improvement Salesperson Registration number 133533 SP, regardless of whether Respondent Noam Yaakobi had knowledge of or participated in the acts or omissions which constitute cause for discipline against Respondent All Bay.

FIFTH CAUSE FOR DISCIPLINE

(Cause for Discipline for Qualifier – Respondent Roy Scot Jones)

35. Pursuant to section 7122.5 of the Code, the causes for discipline established as to Respondent All Bay constitute cause for discipline against Respondent Roy Scot Jones, Sole Owner, under license number 625230, regardless of whether Respondent Roy Scot Jones had knowledge of or participated in the acts or omissions which constitute cause for discipline against Respondent All Bay.

SIXTH CAUSE FOR DISCIPLINE

(Cause for Discipline for Qualifier – Respondent Olga Dotter)

36. Pursuant to section 7122.5 of the Code, the causes for discipline established as to Respondent All Bay constitute cause for discipline against Respondent Olga Dotter, doing business as Lux Living Construction, under Contractor's License number 1102278, regardless of whether Respondent Olga Dotter had knowledge of or participated in the acts or omissions which constitute cause for discipline against Respondent All Bay.

CAUSES FOR OTHER ACTION

FIRST CAUSE FOR OTHER ACTION

(Restrictions on Qualifier – Respondent Noam Yaakobi)

37. Pursuant to Code section 7121.5, if license number 1042837, issued to Respondent All Bay Insulation & HVAC Inc dba All Bay Builders Performance is revoked or suspended, Respondent Noam Yaakobi shall be prohibited from serving as an officer, director, associate, partner, manager, or qualifying individual of a licensee during the time the discipline is imposed, whether or not he had knowledge of or participated in the acts or omissions constituting grounds for discipline as alleged in the causes for discipline, above, and any licensee which employs, elects, or associates Respondent Noam Yaakobi other than as a bona fide nonsupervising employee shall be subject to disciplinary action.

SECOND CAUSE FOR OTHER ACTION

(Restrictions on Qualifier – Respondent Roy Scot Jones)

38. Pursuant to Code section 7121.5, if license number 1042837, issued to Respondent All Bay Insulation & HVAC Inc dba All Bay Builders Performance is revoked or suspended, Respondent Roy Scot Jones shall be prohibited from serving as an officer, director, associate, partner, manager, or qualifying individual of a licensee during the time the discipline is imposed, whether or not he had knowledge of or participated in the acts or omissions constituting grounds for discipline as alleged in the causes for discipline, above, and any licensee which employs, elects, or associates Respondent Roy Scot Jones other than as a bona fide nonsupervising employee shall be subject to disciplinary action.

THIRD CAUSE FOR OTHER ACTION

(Restrictions on Qualifier – Respondent Olga Dotter)

39. Pursuant to Code section 7121.5, if license number 1042837, issued to Respondent All Bay Insulation & HVAC Inc dba All Bay Builders Performance is revoked or suspended, Respondent Olga Dotter shall be prohibited from serving as an officer, director, associate, partner, manager, or qualifying individual of a licensee during the time the discipline is imposed, whether or not she had knowledge of or participated in the acts or omissions constituting grounds for discipline as alleged in the causes for discipline, above, and any licensee which employs, elects, or associates Respondent Olga Dotter other than as a bona fide nonsupervising employee shall be subject to disciplinary action.

PRAYER

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

1. Ordering the revocation or suspension of Contractor's License Number 1042837 issued to All Bay Insulation & HVAC Inc dba All Bay Builders Performance, pursuant to Code section 7090;

2. Ordering the revocation or suspension of Contractor's License Number 625230 issued to Respondent Roy Scot Jones, Sole Owner, pursuant to Code section 7090;

3. Ordering the revocation or suspension of Contractor's License Number 1102278 issued to Respondent Olga Dotter, doing business as Lux Living Construction, pursuant to Code section 7090;

4. Ordering the revocation or suspension of Home Improvement Salesperson Registration number 133533 SP issued to Respondent Noam Yaakobi, pursuant to Code section 7090;

5. Ordering restitution of all damages according to proof suffered by HK and FM, as a condition of probation in the event probation is ordered for Respondent All Bay Insulation & HVAC Inc dba All Bay Builders Performance and/or Respondent Noam Yaakobi, and/or

Respondent Roy Scot Jones, and/or Respondent Olga Dotter, pursuant to Government Code section 11519, subdivision (d);

6. If revocation of Contractor's License Number 1042837, issued to All Bay Insulation & HVAC Inc dba All Bay Builders Performance, is ordered, an order for restitution of all damages suffered by HK and FM as a result of All Bay Insulation & HVAC Inc dba All Bay Builders Performance' conduct as a contractor, as a condition precedent to any future restoration of Contractor's License Number 1042837, or before any new license is issued;

7. Ordering Respondent All Bay Insulation & HVAC Inc dba All Bay Builders Performance, Respondent Noam Yaakobi, Respondent Roy Scot Jones, and Respondent Olga Dotter, to pay the Registrar costs for the investigation and enforcement of the case according to proof at the hearing, pursuant to Code section 125.3;

8. Ordering Respondent All Bay Insulation & HVAC Inc dba All Bay Builders Performance, Respondent Noam Yaakobi, Respondent Roy Scot Jones, and Respondent Olga Dotter, to provide the Registrar with a listing of all contracting projects in progress and the anticipated completion date of each, pursuant to Code section 7095;

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

10. Ordering that Respondent Roy Scot Jones is prohibited from serving as an officer, director, associate, partner, manager or qualifying individual of a licensee, pursuant to Code section 7121.5;

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

///

12. Taking such other and further action deemed proper.

DATED: 6/17/2026

Brian Melvin

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

SF2026900282
45116216