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

In the Matter of the Accusation Against**:** **FUSE SERVICE INC DBA FUSE HVAC REFRIGERATION ELECTRICAL & PLUMBING** **STANISLAV SERGEYEVICH PAKARIN, RMO; RUSLAN MARZAVIEVECH KHUSNIYAROV, RMO** **2222 Ronald Street** **Santa Clara, CA 95050** **Contractor's License No. 1052421, B, C-8, C10, C20, C36, C38** Respondents.	Case No. N2025-287 **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 April 15, 2019, the Registrar of Contractors (Registrar) issued Contractor's License Number 1052421, in classifications B (General Building), C-8 (Concrete), C10 (Electrical), C20 (Warm-Air Heating, Ventilating and Air-Conditioning), C36 (Plumbing), and C38 (Refrigeration), to Fuse Service Inc doing business as Fuse HVAC Refrigeration

Electrical & Plumbing (Respondent Fuse Service). At all times relevant, Stanislav Sergeyevich Pakarin (Respondent Pakarin) was the Chief Executive Officer, President, and Responsible Managing Officer (RMO) for classifications C-8, C36, and C38. At all times relevant, Ruslan Marzavievech Khusniyarov (Respondent Khusniyarov) was the RMO for classifications B, C10 and C20. The Contractor's License was in full force and effect at all times relevant to the charges brought herein and will expire on April 30, 2027, unless renewed.

JURISDICTION

3. 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.

4. 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.

5. 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.

6. 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.

7. 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.

8. 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.

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 7112 of the Code states:

Omission or misrepresentation of a material fact by an applicant or a licensee in obtaining, or renewing a license, or in adding a classification to an existing license constitutes a cause for disciplinary action.

11. Section 7114.1 of the Code states:

Any licensee whose signature appears on a falsified certificate in support of an examinee's experience qualifications, or otherwise certifying to false or misleading experience claims by an applicant, which have been submitted to obtain a contractor's license shall be subject to disciplinary action.

REGULATORY PROVISIONS

12. California Code of Regulations, title 16, Section 825 states:

(a) Every applicant for a contractor's license must have had, within the last 10 years immediately preceding the filing of the application, not less than four years experience as a journeyman, foreman, supervising employee or contractor in the particular class within which the applicant intends to engage as a contractor. For purposes of this section, "journeyman" means an experienced worker in the trade who is fully qualified, as opposed to a trainee, and is able to perform the trade without supervision; or one who has completed an apprenticeship program.

(b) An applicant who was formerly a qualifier on a license in the same classification applied for may compute experience without regard to the ten-year limitation.

(c) An applicant shall not be jeopardized in computing time for service in the armed forces of the United States during a National Emergency and the length of service may be added to the 10 years mentioned above.

(d) Acceptable training in an accredited school or completion of an approved apprenticeship program in accordance with the California Labor Code (commencing with Section 3070 of the Labor Code, Chapter 4, of Division 3) or its equivalent, as approved by the Registrar, in the construction trade for which application is made will be counted as experience. In no case, however, will such training or completion of an approved apprenticeship program count for more than 3 years of the experience.

(e) The required experience shall be possessed by one member of the applicant entity or by a responsible managing employee therefor, and the member or responsible managing employee shall be required to take the examination.

COST RECOVERY AND OTHER AUTHORITY

13. 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.

. . .

14. 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.

15. 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.

16. 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.

17. 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.

18. 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.

FACTUAL ALLEGATIONS

19. On or about February 27, 2020, the Board received an application to add classification C38 (Refrigeration) to Respondent Fuse Service's Contractor's License No. 1052421. As part of the application, Respondent Khusniyarov signed a certification of work experience under penalty of perjury certifying that he had direct knowledge that Respondent Pakarin had worked independently as a full-time refrigeration journeyman from December 18, 2011, to February 25, 2016. Respondent Khusniyarov further certified they were "business associates" by checking the box on the form. However, Respondent Khusniyarov and Respondent Pakarin did not meet until 2017 and were not business associates during the certified period of work experience.

20. On or about November 6, 2020, the Board received an application to add classification C10 (Electrical) to Respondent Fuse Service's Contractor's License No. 1052421. As part of the application, Respondent Pakarin signed a certification of work experience under penalty of perjury certifying that he had direct knowledge that Respondent Khusniyarov had worked as a full-time electrical journeyman from March 8, 2016, to November 2, 2020, under

Respondent Fuse Service's Contractor's License No. 1052421. Respondent Pakarin further certified they were "business associates" by checking the box on the form. However, Respondent Khusniyarov and Respondent Pakarin did not meet until 2017 and were not business associates during the certified period of work experience. Further, Respondent Khusniyarov could not have gained work experience under Respondent Fuse Service's Contractor's License prior to April 15, 2019, the date of issuance for the license.

FIRST CAUSE FOR DISCIPLINE

(Misrepresentation)

21. Respondent Fuse Service has subjected its license to disciplinary action under Code section 7112, in that Respondent Fuse Service misrepresented a material fact in adding classifications C10 (Electrical) and C38 (Refrigeration) to Respondent Fuse Service's existing Contractor's License No. 1052421, as set forth above.

SECOND CAUSE FOR DISCIPLINE

(False or Misleading Work Experience – Respondent Khusniyarov)

22. Respondent Fuse Service has subjected its license to disciplinary action under Code section 7114.1, in that Respondent Khusniyarov certified to a false or misleading work experience claim on Respondent Fuse Service's application to add classification C38 (Refrigeration) to Respondent Fuse Service's existing Contractor's License No. 1052421, as set forth above.

THIRD CAUSE FOR DISCIPLINE

(False or Misleading Work Experience – Respondent Pakarin)

23. Respondent Fuse Service has subjected its license to disciplinary action under Code section 7114.1, in that Respondent Pakarin certified to a false or misleading work experience claim on Respondent Fuse Service's application to add classification C10 (Electrical) to Respondent Fuse Service's existing Contractor's License No. 1052421, as set forth above.

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CAUSES FOR OTHER ACTION

FIRST CAUSE FOR OTHER ACTION

(Restrictions on Qualifier – Respondent Pakarin)

24. Pursuant to Code section 7121.5, if license number 1052421, issued to Respondent Fuse Service Inc doing business as Fuse HVAC Refrigeration Electrical & Plumbing is revoked or suspended, Respondent Stanislav Sergeyevich Pakarin 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 Stanislav Sergeyevich Pakarin other than as a bona fide nonsupervising employee shall be subject to disciplinary action.

SECOND CAUSE FOR OTHER ACTION

(Restrictions on Qualifier – Respondent Khusniyarov)

25. Pursuant to Code section 7121.5, if license number 1052421, issued to Respondent Fuse Service Inc doing business as Fuse HVAC Refrigeration Electrical & Plumbing is revoked or suspended, Respondent Ruslan Marzavievech Khusniyarov 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 Ruslan Marzavievech Khusniyarov 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 1052421 issued to Fuse Service Inc doing business as Fuse HVAC Refrigeration Electrical & Plumbing, pursuant to Code section 7090;

2. Ordering Respondent Fuse Service Inc doing business as Fuse HVAC Refrigeration Electrical & Plumbing, Respondent Stanislav Sergeyevich Pakarin, and Respondent Ruslan Marzavievech Khusniyarov to pay the Registrar costs for the investigation and enforcement of the case according to proof at the hearing, pursuant to Code section 125.3;

3. Ordering Respondent Fuse Service Inc doing business as Fuse HVAC Refrigeration Electrical & Plumbing, Respondent Stanislav Sergeyevich Pakarin, and Respondent Ruslan Marzavievech Khusniyarov to provide the Registrar with a listing of all contracting projects in progress and the anticipated completion date of each, pursuant to Code section 7095;

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

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

5. Taking such other and further action deemed proper.

DATED: 7/1/2026

Brian Melvin

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

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