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9 **BEFORE THE**
DEPARTMENT OF CONSUMER AFFAIRS
10 **FOR THE BUREAU OF AUTOMOTIVE REPAIR**
STATE OF CALIFORNIA

11
12 In the Matter of the Accusation Against:

Case No. 77/13-7

13 **MORENO VALLEY UNION 76 INC.;**
14 **MORENO VALLEY UNION INC,**
OWNER
15 **25020 Alessandro Blvd**
Moreno Valley, CA 92553

OAH No. 2013020668

FIRST AMENDED ACCUSATION

16 **Automotive Repair Dealer Registration No.**
ARD 221768
17 **Smog Check Station License No. RC 221768**
Brake Station License No. C 221768

18 **And**

19 **JOSE MARIA REINO**
20 **22862 Springdale Drive**
21 **Moreno Valley, CA 92557**

22 **Smog Check Inspector License No. EO**
124672
23 **Smog Check Repair Technician License No.**
EI 124672; formerly Advanced Emission
24 **Specialist Technician License No. EA**
124672
25 **Brake Adjuster License No. BA 124672**
Lamp Adjuster License No. LA 124672,

26
27 Respondents.
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1 Complainant alleges:

2 **PARTIES/LICENSE INFORMATION**

3 1. Patrick Dorais (Complainant) brings this Amended Accusation solely in his official
4 capacity as the Acting Chief of the Bureau of Automotive Repair, Department of Consumer
5 Affairs.

6 **Moreno Valley Union 76, Inc.**

7 2. In or about 2002, the Director of Consumer Affairs ("Director") issued Automotive
8 Repair Dealer Registration Number ARD 221768 ("registration") to Moreno Valley Union 76
9 Inc. ("Respondent Moreno Valley Union 76"), with Bita Zareh as president and Reza Zareh as
10 secretary and treasurer. Respondent's registration was in full force and effect at all times relevant
11 to the charges brought herein and will expire on May 31, 2014, unless renewed.

12 3. On or about July 15, 2002, the Director issued Smog Check Station License Number
13 RC 221768 to Moreno Valley Union 76 . Respondent's smog check station license was in full
14 force and effect at all times relevant to the charges brought herein and will expire on May 31,
15 2014, unless renewed.

16 4. On or about October 26, 2004, the Director issued Lamp Station License Number LS
17 221768 to Respondent Moreno Valley Union 76. The Lamp station license was in full force and
18 effect at all times relevant to the charges brought herein and will expire on May 31, 2014, unless
19 renewed.

20 5. On or about October 26, 2004, the Director issued Brake Station License Number BS
21 221768 to Respondent Moreno Valley Union 76. Respondent's brake station license was in full
22 force and effect at all times relevant to the charges brought herein and will expire on May 31,
23 2014, unless renewed.

24 **Jose Maria Reino**

25 6. In or about 1997, the Director issued Advanced Emission Specialist Technician
26 License Number EA 124672 ("technician license") to Jose Maria Reino ("Respondent Reino" or
27 "Reino"). Respondent's advanced emission specialist technician license was due to expire on
28 July 31, 2013. Pursuant to California Code of Regulations, title 16, section 3340.28, subdivision

1 (e), the license was renewed, pursuant to Respondent's election, as Smog Check Inspector
2 License Number EO 124672 and Smog Check Repair Technician License Number EI 124672
3 ("technician licenses"), effective July 24, 2013. Respondent's technician licenses will expire on
4 July 31, 2015, unless renewed.¹

5 7. In or about 2004, the Director issued Brake Adjuster License Number BA 124672 to
6 Respondent Reino. Respondent's brake adjuster license was in full force and effect at all times
7 relevant to the charges brought herein and will expire on July 31, 2016, unless renewed.

8 8. In or about 2004, the Director issued Lamp Adjuster License Number LA 124672 to
9 Respondent Reino. Respondent's lamp adjuster license was in full force and effect at all times
10 relevant to the charges brought herein and will expire on July 31, 2016, unless renewed.

11 JURISDICTION

12 9. California Code of Regulations, title 16, section 3340.28, subdivision (e), states that
13 "[u]pon renewal of an unexpired Basic Area Technician license or an Advanced Emission
14 Specialist Technician license issued prior to the effective date of this regulation, the licensee may
15 apply to renew as a Smog Check Inspector, Smog Check Repair Technician, or both.

16 10. Business and Profession Code ("Bus. & Prof. Code") section 9884.7 provides that the
17 Director may revoke an automotive repair dealer registration.

18 11. Bus. & Prof. Code section 9884.13 provides, in pertinent part, that the expiration of a
19 valid registration shall not deprive the Director of jurisdiction to proceed with a disciplinary
20 proceeding against an automotive repair dealer or to render a decision temporarily or permanently
21 invalidating (suspending or revoking) a registration.

22 12. Bus. & Prof. Code section 9889.1 provides, in pertinent part, that the Director may
23 suspend or revoke any license issued under Articles 5 and 6 (commencing with section 9887.1) of
24 the Automotive Repair Act.

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26 ¹ Effective August 2, 2012, California Code of Regulations, title 16, sections 3340.28,
27 3340.29, and 3340.30 were amended to implement a license restructure from the Advanced
28 Emission Specialist Technician (EA) license and Basic Area (EB) Technician license to Smog
Check Inspector (EO) license and/or Smog Check Repair Technician (EI) license.

1 ...

2 "(c) Notwithstanding subdivision (b), the director may suspend, revoke, or place on
3 probation the registration for all places of business operated in this state by an automotive repair
4 dealer upon a finding that the automotive repair dealer has, or is, engaged in a course of repeated
5 and willful violations of this chapter, or regulations adopted pursuant to it."

6 17. Bus. & Prof. Code section 9889.3 states, in pertinent part: "The director may suspend,
7 revoke, or take other disciplinary action against a license as provided in this article [Article 7
8 (commencing with section 9889.1) of the Automotive Repair Act] if the licensee or any partner,
9 officer, or director thereof:

10 (a) Violates any section of the business and Professions Code which relates to his or
11 her licensed activities.

12 ...

13 (c) Violates any of the regulations promulgated by the director pursuant to this
14 chapter.

15 (d) Commits any act involving dishonesty, fraud, or deceit whereby another is
16 injured...."

17 18. Bus. & Prof. Code section 9889.9 states that "[w]hen any license has been revoked or
18 suspended following a hearing under the provisions of this article [Article 7 (commencing with
19 section 9889.1) of the Automotive Repair Act], any additional license issued under Articles 5 and
20 6 of this chapter in the name of the licensee may be likewise revoked or suspended by the
21 director."

22 19. Bus. & Prof. Code section 22, subdivision (a), states: "Board" as used in any
23 provision of this Code, refers to the board in which the administration of the provisions is vested,
24 and unless otherwise expressly provided, shall include "bureau," "commission," "committee,"
25 "department," "division," "examining committee," "program," and "agency."

26 20. Bus. & Prof. Code section 477, subdivision (b), states, in pertinent part, that a
27 "license" includes "registration" and "certificate."

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1 of Lamp Adjustment ("Lamp Certificate") No. LC [REDACTED]. The certificates indicated that
2 Reino performed the brake and lamp inspections on the vehicle.

3 25. On November 15 and 16, 2012, the Bureau inspected the vehicle and found that the
4 right front brake rotor was not within manufacturer's specifications, the right front headlamp was
5 still out of adjustment, the defective rear license plate lamp bulb was still in place on the vehicle,
6 and the right front wheel had not been removed to inspect the right front rotor.

7 **FIRST CAUSE FOR DISCIPLINE**

8 **(Untrue or Misleading Statements)**

9 26. Respondent Moreno Valley Union 76's registration is subject to disciplinary action
10 pursuant to Bus. & Prof. Code section 9884.7, subdivision (a)(1), in that Respondent made or
11 authorized statements which it knew or in the exercise of reasonable care should have known to
12 be untrue or misleading, as follows:

13 a. Respondent Moreno Valley Union 76's technician, Respondent Reino, certified under
14 penalty of perjury on Brake Certificate No. BC [REDACTED] that the applicable inspection was
15 performed on the brake system on the Bureau's 2002 Chevrolet Cavalier. In fact, Reino failed to
16 inspect the right front brake rotor on the vehicle.

17 b. Respondent Moreno Valley Union 76's technician, Respondent Reino, certified under
18 penalty of perjury on Brake Certificate No. BC [REDACTED] that the rotors on the Bureau's 2002
19 Chevrolet Cavalier were in a satisfactory condition. In fact, the right front brake rotor was
20 machined below the manufacturer's thickness specifications.

21 c. Respondent Moreno Valley Union 76's technician, respondent Reino, Certified under
22 penalty of perjury on Lamp Certificate No. LC [REDACTED] that the applicable adjustment or repair
23 had been performed on the lighting system on the Bureau's 2002 Chevrolet Cavalier. In fact, the
24 right front headlamp was out of adjustment and the defective rear license plate lamp bulb was still
25 in place on the vehicle.

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1 a. **Section 3305, subdivision (a):** Respondent failed to ensure that the inspection of the
2 brake system and inspection, adjustment, or repair of the lighting system were performed on the
3 Bureau's 2002 Cavalier I accordance with the specifications, instructions, and directives issued
4 by the Bureau and the vehicle manufacturer.

5 b. **Section 3316, subdivision (d)(2):** Respondent issued Lamp Certificate No.
6 LC [REDACTED] as to the Bureau's 2002 Chevrolet Cavalier when all of the lamps, lighting
7 equipment, and/or related electrical systems on the vehicle were not in compliance with Bureau
8 regulations.

9 c. **Section 3321, subdivision (c)(2):** Respondent issued Brake Certificate No.
10 BC [REDACTED] as to the Bureau's 2002 Chevrolet Cavalier when the brake system on the vehicle had
11 not been completely tested or inspected.

12 **SIXTH CAUSE FOR DISCIPLINE**

13 **(Failure to Comply with Regulations)**

14 31. Respondent Moreno Valley Union 76's brake and lamp station licenses are subject to
15 disciplinary action pursuant to Bus. & Prof. Code section 9889.3, subdivision (c), in that
16 Respondent failed to comply with the provisions of California Code of Regulations, title 16,
17 sections 3305, subdivision (a), 3316, subdivision (d)(2), and 3321, subdivision (c)(2), as set forth
18 in paragraph 30 above.

19 **SEVENTH CAUSE FOR DISCIPLINE**

20 **(Dishonesty, Fraud, or Deceit)**

21 32. Respondent Moreno Valley Union 76's brake and lamp station licenses are subject to
22 disciplinary action pursuant to Bus. & Prof. Code section 9889.3, subdivision (d), in that
23 Respondent committed acts involving dishonesty, fraud, or deceit whereby another was injured,
24 as set forth in paragraphs 26 and 28 above.

25 **EIGHTH CAUSE FOR DISCIPLINE**

26 **(Violations of Regulations)**

27 33. Respondent Reino's brake and lamp adjuster licenses are subject to disciplinary
28 action pursuant to Bus. & Prof. Code section 9889.3, subdivision (c), in that Respondent failed to

1 comply with the provisions of California Code of Regulations, title 16, sections 3305, subdivision
2 (a), 3316, subdivision (d)(2), and 3321, subdivision (c)(2), as set forth in paragraph 30 above.

3 **NINTH CAUSE FOR DISCIPLINE**

4 **(Dishonesty, Fraud, or Deceit)**

5 34. Respondent Reino's brake and lamp adjuster licenses are subject to disciplinary
6 action pursuant to Bus. & Prof. Code section 9889.3, subdivision (d), in that Respondent
7 committed acts involving dishonesty, fraud, or deceit whereby another was injured, as set forth in
8 paragraph 26 above.

9 **UNDERCOVER OPERATIONS #2: 1998 TOYOTA CAMRY**

10 35. On January 13, 2012, an undercover operator of the Bureau ("operator") took the
11 Bureau's 1998 Toyota Camry to Respondent Moreno Valley Union 76's facility. The operator
12 met with Respondent Reino and requested brake, lamp, and smog inspections on the vehicle. The
13 right rear brake drum on the Bureau-documented vehicle was machined beyond the
14 manufacturer's drum discard diameter specifications, the right front brake rotor was machined
15 below the manufacturer's minimum thickness specifications, both front headlamps were out of
16 adjustment, and the left rear back up lamp bulb and right rear tail light bulb were defective. The
17 operator told Reino that she would leave the vehicle at the facility and wait for a phone call
18 letting her know that the work was completed. The operator signed and received a copy of a
19 written estimate in the amount of \$160, then left the facility. At approximately 1157 hours that
20 same day, the operator returned to the facility to retrieve the vehicle. The operator paid the
21 facility \$162.69 and received copies of various documents, including Certificate of Brake
22 Adjustment ("Brake Certificate") No. BC [REDACTED], Certificate of Lamp Adjustment ("Lamp
23 Certificate") No. LC [REDACTED] and an invoice in the amount of \$162.69. The facility had charged
24 the operator \$2.50 for replacing a light bulb on the vehicle. The certificates indicated that Reino
25 performed the brake and lamp inspections of the vehicle.

26 36. On January 24, 2012, the Bureau inspected the vehicle and found that the defective
27 right rear tail light bulb had been replaced; however, both headlamps were still out of adjustment,
28 the defective left rear backup lamp bulb was still in place on the vehicle, and the right rear brake

1 drum and right front brake rotor were not within manufacturer's specifications. The Bureau also
2 found that none of the wheels had been removed from the vehicle.

3 **TENTH CAUSE FOR DISCIPLINE**

4 **(Untrue or Misleading Statements)**

5 37. Respondent Moreno Valley Union 76's registration is subject to disciplinary action
6 pursuant to Bus. & Prof. Code section 9884.7, subdivision (a)(1) in that Respondent made or
7 authorized statements which it knew or in the exercise of reasonable care should have known to
8 be untrue or misleading, as follows:

9 a. Respondent Moreno Valley Union 76's technician, Respondent Reino, certified under
10 penalty of perjury on Brake Certificate No. BC [REDACTED] that the applicable inspections was
11 performed on the brake system on the Bureau's 1998 Toyota Camry. In fact, Reino failed to
12 remove the wheels on the vehicle to inspect and/or measure the brake rotors and brake drum.

13 b. Respondent Moreno Valley Union 76's technician, Respondent Reino, certified under
14 penalty of perjury on Brake Certificate No. BC [REDACTED] that the drums and rotors on the Bureau's
15 1998 Toyota Camry were in a satisfactory condition. In fact, the right rear brake drum was
16 machined beyond the manufacturer's drum discard diameter specifications and the right front
17 brake rotor was machined below the manufacturer's minimum thickness specifications.

18 c. Respondent Moreno Valley Union 76's technician, Respondent Reino, certified under
19 penalty of perjury on Lamp Certificate No. LC [REDACTED] that the applicable adjustment or repair
20 had been performed on the lighting system on the Bureau's 1998 Toyota Camry. In fact, both
21 front headlamps were out of adjustment and the defective left rear backup lamp bulb was still in
22 place on the vehicle.

23 **ELEVENTH CAUSE FOR DISCIPLINE**

24 **(Fraud)**

25 38. Respondent Moreno Valley Union 76's registration is subject to disciplinary action
26 pursuant to Bus. & Prof. Code section 9884.7, subdivision (a)(4), in that Respondent committed
27 an act constituting fraud, as follows: Respondent obtained payment from the operator for
28 performing the applicable inspections, adjustments, or repairs of the brake and lighting systems

1 on the Bureau's 1998 Toyota Camry as specified by the Bureau and in accordance with the
2 Vehicle Code. In fact, Respondent failed to perform the necessary inspections, adjustments, and
3 repairs in compliance with Bureau Regulations or the Vehicle Code, as set forth in paragraph 37
4 above.

5 **TWELFTH CAUSE FOR DISCIPLINE**

6 **(Failure to Comply with the Bus. & Prof. Code)**

7 39. Respondent Moreno Valley Union 76's registration is subject to disciplinary action
8 pursuant to Bus. & Prof. Code section 9884.7, subdivision (a)(6) in that Respondent failed to
9 comply with section 9884.9, subdivision (a), of that Code in the following material respects:
10 Respondent replaced the defective right rear tail light bulb on the Bureau's 1998 Toyota Camry
11 and exceeded the original estimate price without the operator's authorization.

12 **THIRTEENTH CAUSE FOR DISCIPLINE**

13 **(Violations of Regulations)**

14 40. Respondent Moreno Valley Union 76's registration is subject to disciplinary action
15 pursuant to Bus. & Prof. Code section 9884.7, subdivision (a)(6), in that Respondent failed to
16 comply with provisions of California Code of Regulations, title 16, in the following material
17 respects:

18 a. Section 3305, subdivision (a): Respondent failed to ensure that the inspection of the
19 brake system and inspection, adjustment, or repair of the lighting system were performed on the
20 Bureau's 1998 Toyota Camry in accordance with the specifications, instructions, and directives
21 issued by the Bureau and the vehicle manufacturer.

22 b. Section 3316, subdivision (d)(2): Respondent issued Lamp Certificate No.
23 LC [REDACTED] as to the Bureau's 1998 Toyota Camry when all of the lamps, lighting equipment,
24 and/or related electrical systems on the vehicle were not in compliance with Bureau regulations.

25 c. Section 3321, subdivision (c)(2): Respondent issued Brake Certificate No.
26 BC [REDACTED] as to the Bureau's 1998 Toyota Camry when the brake system on the vehicle had not
27 been completely tested or inspected.

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FOURTEENTH CAUSE FOR DISCIPLINE

(Failure to Comply with Regulations)

41. Respondent Moreno Valley Union 76's brake and lamp station licenses are subject to disciplinary action pursuant to Bus. & Prof. Code section 9889.3, subdivision (c), in that Respondent failed to comply with the provisions of California Code of Regulations, title 16, section 3305, subdivision (a), 3316, subdivision (d)(2), and 3321, subdivision (c)(2), as set forth in paragraph 40 above.

FIFTEENTH CAUSE FOR DISCIPLINE

(Dishonesty, Fraud, or Deceit)

42. Respondent Moreno Valley Union 76's brake and lamp station licenses are subject to disciplinary action pursuant to Bus. & Prof. Code section 9889.3, subdivision (d), in that Respondent committed an act involving dishonesty, fraud, or deceit whereby another was injured, as set forth in paragraphs 37 and 38 above.

SIXTEENTH CAUSE FOR DISCIPLINE

(Violations of Regulations)

43. Respondent Reino's brake and lamp adjuster licenses are subject to disciplinary action pursuant to Bus. & Prof. Code section 9889.3, subdivision (c), in that Respondent failed to comply with the provisions of California Code of Regulations, title 16, section 3305, subdivision (a), 3316, subdivision (d)(2), and 3321, subdivision (c)(2), as set forth in paragraph 40 above.

SEVENTEENTH CAUSE FOR DISCIPLINE

(Dishonesty, Fraud, or Deceit)

44. Respondent Reino's brake and lamp adjuster licenses are subject to disciplinary action pursuant to Bus. & Prof. Code section 9889.3, subdivision (d), in that Respondent committed acts involving dishonesty, fraud, or deceit whereby another was injured, as set forth in paragraph 37 above.

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1 **EIGHTEENTH CAUSE FOR DISCIPLINE**

2 **(Dishonesty, Fraud or Deceit)**

3 45. Respondent Moreno Valley Union 76's smog check station license is subject to
4 disciplinary action pursuant to Health & Saf. Code section 44072.2, subdivision (d), in that
5 Respondent committed dishonest, fraudulent, or deceitful acts whereby another was injured, as set
6 forth in paragraphs 26, 28, 37, and 38 above.

7 **NINETEENTH CAUSE FOR DISCIPLINE**

8 **(Dishonesty, Fraud or Deceit)**

9 46. Respondent Reino's technician licenses are subject to disciplinary action pursuant to
10 Health & Saf. Code section 44072.2, subdivision (d), in that Respondent committed dishonest,
11 fraudulent, or deceitful acts whereby another was injured, as set forth in paragraphs 26 and 37
12 above.

13 **OTHER MATTERS**

14 47. Pursuant to Bus. & Prof. Code section 9884.7, subdivision (c), the Director may
15 suspend, revoke or place on probation the registration for all places of business operated in this
16 state by Respondent Moreno Valley Union 76, Inc., upon a finding that Respondent has, or is,
17 engaged in a course of repeated and willful violations of the laws and regulations pertaining to an
18 automotive repair dealer.

19 48. Pursuant to Health & Saf. Code section 44072.8, if Smog Check Station License
20 Number RC 221768, issued to Respondent Moreno Valley Union 76, Inc., is revoked or
21 suspended, any additional license issued under Chapter 5 of the Health & Saf. Code in the name
22 of said licensee may be likewise revoked or suspended by the Director.

23 49. Pursuant to Bus. & Prof. Code section 9889.9, if Lamp Station License Number LS
24 221768, issued to Respondent Moreno Valley Union 76, Inc., is revoked or suspended, any
25 additional license issued under Articles 5 and 6 of Chapter 20.3 of the Bus. & Prof. Code in the
26 name of said licensee may be likewise revoked or suspended by the Director.

27 50. Pursuant to Bus. & Prof. Code section 9889.9, if Brake Station License Number BS
28 221768, issued to Respondent Moreno Valley Union 76, Inc., is revoked or suspended, any

1 additional license issued under Articles 5 and 6 of Chapter 20.3 of the Bus. & Prof. Code in the
2 name of said licensee may be likewise revoked or suspended by the Director.

3 51. Pursuant to Health & Saf. Code section 44072.8, if Smog Check Inspector License
4 Number EO 124672 and Smog Check Repair Technician License Number EI 124672, (formerly
5 Advanced Emission Specialist Technician License No. EA 124672) issued to Jose Maria Reino,
6 (formerly Advanced Emission Specialist Technician License No. EA 124672) are revoked or
7 suspended, any additional license issued under Chapter 5 of the Health & Saf. Code in the name
8 of said licensee may be likewise revoked or suspended by the Director.

9 52. Pursuant to Bus. & Prof. Code section 9889.9, if Brake Adjuster License Number BA
10 124672, issued to Respondent Jose Maria Reino, is revoked or suspended, any additional license
11 issued under Articles 5 and 6 of Chapter 20.3 of the Bus. & Prof. Code in the name of said
12 licensee may be likewise revoked or suspended by the Director.

13 53. Pursuant to Bus. & Prof. Code section 9889.9, if Lamp Adjuster License Number LA
14 124672, issued to Respondent Jose Maria Reino, is revoked or suspended, any additional license
15 issued under Articles 5 and 6 of Chapter 20.3 of the Bus. & Prof. Code in the name of said
16 licensee may be likewise revoked or suspended by the Director.

17 **PRAYER**

18 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
19 and that following the hearing, the Director of Consumer Affairs issue a decision:

20 1. Revoking or suspending Automotive Repair Dealer Registration Number ARD
21 221768, issued to Moreno Valley Union 76 Inc.;

22 2. Revoking or suspending any other automotive repair dealer registration issued to
23 Moreno Valley Union 76, Inc.;

24 3. Revoking or suspending Smog Check Station License Number RC 221768, issued to
25 Moreno Valley Union 76 Inc.;

26 4. Revoking or suspending any additional license issued under Chapter 5 of the Health
27 and Safety Code in the name of Moreno Valley Union 76, Inc.;

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1 5. Revoking or suspending Lamp Station License Number LS 221768, issued to Moreno
2 Valley Union 76, Inc.;

3 6. Revoking or suspending Brake Station License Number BS 221768, issued to Moreno
4 Valley Union 76, Inc.;

5 7. Revoking or suspending any additional license issued under Articles 5 and 6 of
6 Chapter 20.3 of the Business and Professions Code in the name Moreno Valley Union 76 Inc.;

7 8. Revoking or suspending Smog Check Inspector License Number EO 124672, issued
8 to Jose Maria Reino;

9 9. Revoking or suspending Smog Check Repair Technician License Number EI 124672,
10 issued to Jose Maria Reino;

11 10. Revoking or suspending any additional license issued under Chapter 5 of Health and
12 Safety Code in the name of Jose Maria Reino;

13 11. Revoking or suspending Brake Adjuster License Number BA 124672, issued to Jose
14 Maria Reino;

15 12. Revoking or suspending Lamp Adjuster License Number LA 124672, issued to Jose
16 Maria Reino;

17 13. Revoking or suspending any additional license issued under Articles 5 and 6 of
18 Chapter 20.3 of the Business and Professions Code in the name of Jose Maria Reino;

19 14. Ordering Moreno Valley Union 76, Inc., and Jose Maria Reino to pay the Director of
20 Consumer Affairs the reasonable costs of the investigation and enforcement of this case, pursuant
21 to Business and Professions Code section 125.3;

22 15. Taking such other and further action as deemed necessary and proper.

23
24 DATED: October 15, 2013 

25 PATRICK DORAIS
26 Acting Chief
27 Bureau of Automotive Repair
28 Department of Consumer Affairs
State of California
Complainant

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