

**BEFORE THE DIRECTOR  
DEPARTMENT OF CONSUMER AFFAIRS  
BUREAU OF AUTOMOTIVE REPAIR  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

**MEHDI PANAHIPOUR DBA PARS TECH**  
12520 Magnolia Avenue, Unit I  
Riverside, CA 92503

Lamp Station License No. LS 257965  
Brake Station License No. BS 257965  
Automotive Repair Dealer Registration  
No. 257965

**MEHDI PANAHIPOUR**  
Lamp Adjuster License No. LA 144216, Class A  
Brake Adjuster License No. BA 144216, Class C

Respondents.

Case No. 77/13-13

OAH No. 2013010340

**DECISION**

The attached Stipulated Settlement and Disciplinary Order as to Pars Tech and Mehdi Panahipour is hereby accepted and adopted as the Decision of the Director of the Department of Consumer Affairs in the above-entitled matter.

This Decision shall become effective January 8, 2014.

DATED: December 17, 2013

  
\_\_\_\_\_  
DONALD CHANG  
Assistant Chief Counsel  
Department of Consumer Affairs

1 KAMALA D. HARRIS  
Attorney General of California  
2 JAMES LEDAKIS  
Supervising Deputy Attorney General  
3 WILLIAM A. BUSS  
Deputy Attorney General  
4 State Bar No. 134958  
110 West "A" Street, Suite 1100  
5 San Diego, CA 92101  
P.O. Box 85266  
6 San Diego, CA 92186-5266  
Telephone: (619) 645-2039  
7 Facsimile: (619) 645-2061  
*Attorneys for Complainant*

8  
9 **BEFORE THE**  
**DEPARTMENT OF CONSUMER AFFAIRS**  
**FOR THE BUREAU OF AUTOMOTIVE REPAIR**  
10 **STATE OF CALIFORNIA**

11  
12 In the Matter of the Accusation Against:

Case No. 77/13-13

13 **MEHDI PANAHIPOUR DBA PARS TECH**  
12520 Magnolia Avenue, Unit I  
14 Riverside, CA 92503

OAH No. 2013010340

15 Lamp Station License No. LS257965  
16 Brake Station License No. BS257965  
Automotive Repair Dealer Registration No.  
17 257965

**STIPULATED SETTLEMENT AND  
DISCIPLINARY ORDER AS TO PARS  
TECH AND MEHDI PANAHIPOUR**

18 **MEHDI PANAHIPOUR**  
Lamp Adjuster License No. LA144216,  
19 Class A  
Brake Adjuster License No. BA144216,  
20 Class C

21  
22 Respondents.

23  
24  
25 In the interest of a prompt and speedy settlement of this matter, consistent with the public  
26 interest and the responsibilities of the Director of Consumer Affairs and the Bureau of  
27 Automotive Repair the parties hereby agree to the following Stipulated Settlement and  
28 Disciplinary Order which will be submitted to the Director for the Director's approval and

1 adoption as the final disposition of the Accusation solely with respect to MEHDI PANAHIPOUR.  
2 dba PARS TECH and MEHDI PANAHIPOUR.

3 PARTIES

4 1. Patrick Dorais (Complainant) is the Acting Chief of the Bureau of Automotive  
5 Repair. He brought this action solely in his official capacity and is represented in this matter by  
6 Kamala D. Harris, Attorney General of the State of California, by William A. Buess, Deputy  
7 Attorney General.

8 2. Respondent Mehdi Panahipour dba Pars Tech (Respondent) is represented in this  
9 proceeding by attorney Sunil Brahmhatt, whose address is: Sunil Arvind Brahmhatt 2700 N.  
10 Main Street, Suite 310 Santa Ana, CA 92705.

11 3. On or about April 29, 2009, the Bureau of Automotive Repair issued Automotive  
12 Repair Dealer Registration No. 257965 to Mehdi Panahipour dba Pars Tech (Respondent). The  
13 Automotive Repair Dealer Registration was in full force and effect at all times relevant to the  
14 charges brought in Accusation No. 77/13-13 and will expire on April 30, 2014, unless renewed.

15 4. On or about June 2, 2009, the Bureau of Automotive Repair issued Lamp Station  
16 License No. LS257965 to Mehdi Panahipour dba Pars Tech (Respondent). The Lamp Station  
17 License was in full force and effect at all times relevant to the charges brought in Accusation No.  
18 77/13-13 and will expire on April 30, 2014, unless renewed.

19 5. On or about June 2, 2009, the Bureau of Automotive Repair issued Brake Station  
20 License No. BS257965 to Mehdi Panahipour dba Pars Tech (Respondent). The Brake Station  
21 License was in full force and effect at all times relevant to the charges brought in Accusation No.  
22 77/13-13 and will expire on April 30, 2014, unless renewed.

23 6. On or about 2005, the Bureau of Automotive Repair issued Lamp Adjuster License  
24 No. LA 144216, Class A, to Mehdi Panahipour (Respondent). The Lamp Adjuster License was in  
25 full force and effect at all times relevant to the charges brought in Accusation No. 77/13-13 and  
26 will expire on February 28, 2014 unless renewed.

27 7. On or about 2005, the Bureau of Automotive Repair issued Brake Adjuster License  
28 No. BA 144216, Class C, to Mehdi Panahipour (Respondent). The Brake Adjuster License was

1 in full force and effect at all times relevant to the charges brought in Accusation No. 77/13-13 and  
2 will expire on February 28, 2014 unless renewed.

3 JURISDICTION

4 8. Accusation No. 77/13-13 was filed before the Director of Consumer Affairs  
5 (Director), for the Bureau of Automotive Repair (Bureau), and is currently pending against  
6 Respondents. The Accusation and all other statutorily required documents were properly served  
7 on Respondents on September 24, 2012. Respondents timely filed its Notice of Defense  
8 contesting the Accusation.

9 9. A copy of Accusation No. 77/13-13 is attached as exhibit A and incorporated herein  
10 by reference.

11 ADVISEMENT AND WAIVERS

12 10. Respondents have carefully read, fully discussed with counsel, and understand the  
13 charges and allegations in Accusation No. 77/13-13. Respondents have also carefully read, fully  
14 discussed with counsel, and understand the effects of this Stipulated Settlement and Disciplinary  
15 Order.

16 11. Respondents are fully aware of their legal rights in this matter, including the right to a  
17 hearing on the charges and allegations in the Accusation; the right to be represented by counsel at  
18 its own expense; the right to confront and cross-examine the witnesses against them; the right to  
19 present evidence and to testify on its own behalf; the right to the issuance of subpoenas to compel  
20 the attendance of witnesses and the production of documents; the right to reconsideration and  
21 court review of an adverse decision; and all other rights accorded by the California  
22 Administrative Procedure Act and other applicable laws.

23 12. Respondents voluntarily, knowingly, and intelligently waive and give up each and  
24 every right set forth above.

25 CULPABILITY

26 13. Respondents admit the truth of each and every charge and allegation in Accusation  
27 No. 77/13-13.

1 14. Respondent agrees that its Automotive Repair Dealer Registration, its Lamp Station  
2 License and its Brake Station license are subject to discipline and Respondent agrees to be bound  
3 by the Director's probationary terms as set forth in the Disciplinary Order below.

4 15. Respondent agrees that his Lamp Adjuster License and his Brake Adjuster License  
5 are subject to discipline and Respondent agrees to be bound by the Director's probationary terms  
6 as set forth in the Disciplinary Order below.

7 CIRCUMSTANCES IN MITIGATION

8 16. Respondent Mehdi Panahipour dba Pars Tech and Respondent Mehdi Panahipour in  
9 his individual capacity have never been the subject of any disciplinary action. They are admitting  
10 responsibility in the proceedings.

11 RESERVATION

12 17. The admissions made by Respondents herein are only for the purposes of this  
13 proceeding, or any other proceedings in which the Director of Consumer Affairs, Bureau of  
14 Automotive Repair, or other professional licensing agency is involved, and shall not be  
15 admissible in any other criminal or civil proceeding.

16 CONTINGENCY

17 18. This stipulation shall be subject to approval by the Director of Consumer Affairs or  
18 the Director's designee. Respondents understand and agree that counsel for Complainant and the  
19 staff of the Bureau of Automotive Repair may communicate directly with the Director and staff of  
20 the Department of Consumer Affairs regarding this stipulation and settlement, without notice to  
21 or participation by Respondents or their counsel. By signing the stipulation, Respondents  
22 understand and agree that they may not withdraw its agreement or seek to rescind the stipulation  
23 prior to the time the Director considers and acts upon it. If the Director fails to adopt this  
24 stipulation as the Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of  
25 no force or effect, except for this paragraph, it shall be inadmissible in any legal action between  
26 the parties, and the Director shall not be disqualified from further action by having considered  
27 this matter.

28

1 19. The parties understand and agree that Portable Document Format (PDF) and facsimile  
2 copies of this Stipulated Settlement and Disciplinary Order, including Portable Document Format  
3 (PDF) and facsimile signatures thereto, shall have the same force and effect as the originals.

4 20. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an  
5 integrated writing representing the complete, final, and exclusive embodiment of their agreement.  
6 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,  
7 negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary  
8 Order may not be altered, amended, modified, supplemented, or otherwise changed except by a  
9 writing executed by an authorized representative of each of the parties.

10 21. In consideration of the foregoing admissions and stipulations, the parties agree that  
11 the Director may, without further notice or formal proceeding, issue and enter the following  
12 Disciplinary Order:

13 **DISCIPLINARY ORDER**

14 IT IS HEREBY ORDERED that Automotive Repair Dealer Registration No. 257965, and  
15 Lamp Station License No. LS 257965, and Brake Station License No. BS 257965 issued to  
16 Respondent Mehdi Panahipour dba Pars Tech (Respondent), and the Lamp Adjuster License No.  
17 LA 144216, Class A, and Brake Adjuster License No. BA 144216, Class C, issued to Mehdi  
18 Panahipour are revoked. However, the revocations are stayed and Respondents are placed on  
19 probation for three (3) years on the following terms and conditions.

20 1. **Actual Suspension.** Automotive Repair Registration No. 257965, Lamp Station  
21 License No. LS257965, and Brake Station License BS257965 issued to Respondent Mehdi  
22 Panahipour dba PARS TECH, and are suspended for fifteen (15) consecutive days commencing  
23 on the effective date in the final Order.

24 2. **Actual Suspension.** Lamp Adjuster License No. LA144216, Class A and Brake  
25 Adjuster License No. BA144216, Class C issued to Mehdi Panahipour are suspended for fifteen  
26 (15) consecutive days commencing on the effective date in the final Order.

27 3. **Obey All Laws.** Comply with all statutes, regulations and rules governing  
28 automotive inspections, estimates and repairs.

1           4.   **Post Sign.** Post a prominent sign, provided by the Bureau, indicating the beginning  
2 and ending dates of the suspension and indicating the reason for the suspension. The sign shall be  
3 conspicuously displayed in a location open to and frequented by customers and shall remain  
4 posted during the entire period of actual suspension.

5           5.   **Reporting.** Respondents or Respondents' authorized representative must report in  
6 person or in writing as prescribed by the Bureau of Automotive Repair, on a schedule set by the  
7 Bureau, but no more frequently than each quarter, on the methods used and success achieved in  
8 maintaining compliance with the terms and conditions of probation.

9           6.   **Report Financial Interest.** Within 30 days of the effective date of this action, report  
10 any financial interest which any partners, officers, or owners of the Respondent facility and  
11 Respondent Panahipour may have in any other business required to be registered pursuant to  
12 Section 9884.6 of the Business and Professions Code.

13          7.   **Random Inspections.** Provide Bureau representatives unrestricted access to inspect  
14 all vehicles (including parts) undergoing repairs, up to and including the point of completion.

15          8.   **Jurisdiction.** If an accusation is filed against Respondents during the term of  
16 probation, the Director of Consumer Affairs shall have continuing jurisdiction over this matter  
17 until the final decision on the accusation, and the period of probation shall be extended until such  
18 decision.

19          9.   **Violation of Probation.** Should the Director of Consumer Affairs determine that  
20 Respondents have failed to comply with the terms and conditions of probation, the Department  
21 may, after giving notice and opportunity to be heard revoke the licenses and registration.

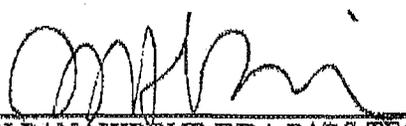
22          10. **Cost Recovery.** Payment to the Bureau of the full amount of cost recovery shall be  
23 received no later than twelve (12) months before probation terminates. Failure to complete  
24 payment of cost recovery within this time frame shall constitute a violation of probation which  
25 may subject Respondents' licenses/registration to outright revocation; however, the Director or  
26 the Director's Bureau of Automotive Repair designee may elect to continue probation until such  
27 time as reimbursement of the entire cost recovery amount has been made to the Bureau. The  
28 amount of cost recovery is: \$16,047.67.

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ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Sunil Brahmhatt. I understand the stipulation and the effect it will have on my Automotive Repair Dealer Registration, Lamp Station License, and Brake Station License. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Director of Consumer Affairs.

DATED: 9-10-13

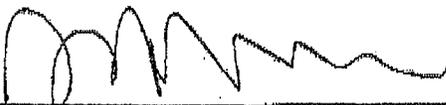
  
MEHDI PANAHIPOUR DBA PARS TECH  
Respondent and Authorized Agent

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ACCEPTANCE

I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully discussed it with my attorney, Sunil Brahmhatt. I understand the stipulation and the effect it will have on my Lamp Adjuster License and my Brake Adjuster License. I enter into this Stipulated Settlement and Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Director of Consumer Affairs.

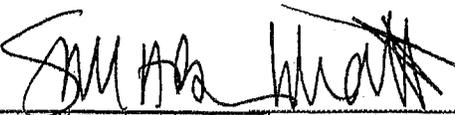
DATED: 9-10-13

  
MEHDI PANAHIPOUR  
Respondent

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I have read and fully discussed with Respondent Mehdi Panahi pour dba Pars Tech the terms and conditions and other matters contained in the above Stipulated Settlement and Disciplinary Order. I approve its form and content.

DATED: 9-10-13

  
Sunil Brahmhatt  
Attorney for Respondent

ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Director of Consumer Affairs.

Dated:

Respectfully submitted,

KAMALA D. HARRIS  
Attorney General of California  
JAMES LEDAKIS  
Supervising Deputy Attorney General

WILLIAM A. BUSS  
Deputy Attorney General  
*Attorneys for Complainant*

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ENDORSEMENT

The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully submitted for consideration by the Director of Consumer Affairs.

Dated: *September 11, 2013*

Respectfully submitted,

KAMALA D. HARRIS  
Attorney General of California  
JAMES LEDAKIS  
Supervising Deputy Attorney General



WILLIAM A. BUSS  
Deputy Attorney General  
*Attorneys for Complainant*

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**Exhibit A**

**Accusation No. 77/13-13**

1 KAMALA D. HARRIS  
Attorney General of California  
2 ALFREDO TERRAZAS.  
Senior Assistant Attorney General  
3 LINDA K. SCHNEIDER  
Supervising Deputy Attorney General  
4 State Bar No. 101336  
110 West "A" Street, Suite 1100  
5 San Diego, CA 92101  
P.O. Box 85266  
6 San Diego, CA 92186-5266  
Telephone: (619) 645-3037  
7 Facsimile: (619) 645-2061  
*Attorneys for Complainant*

8  
9 **BEFORE THE**  
**DEPARTMENT OF CONSUMER AFFAIRS,**  
**FOR THE BUREAU OF AUTOMOTIVE REPAIR**  
10 **STATE OF CALIFORNIA**

11  
12 In the Matter of the Accusation Against:

Case No. 77/13-13

13 **PARS TECH**  
**MEHDI PANAHIPOUR, OWNER**  
14 **12520 Magnolia Avenue Unit I**  
**Riverside, CA 92503**

**ACCUSATION**

15 **Automotive Repair Dealer Registration No. 257965**  
16 **Lamp Station License No. 257965, Class A**  
**Brake Station License No. 257965, Class C,**

17 **MEHDI PANAHIPOUR**  
18 **2563 Flanders Road**  
**Riverside, CA 92507**

19  
20 **Lamp Adjuster License No. 144216, Class A**  
**Brake Adjuster License No. 144216, Class C,**

21 **and**

22 **ALIREZA MAHDIYAR**  
23 **12520 Magnolia Avenue Unit I**  
**Riverside, CA 92503**

24 **Lamp Adjuster License No. 630878, Class A**  
25 **Brake Adjuster License No. 630878, Class C**

26 Respondents.

27 ///

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1 Complainant alleges:

2 **PARTIES**

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

6 **Pars Tech; Mehdi Panahipour, Owner**

7 2. On or about April 29, 2009, the Bureau issued Automotive Repair Dealer  
8 Registration Number 257965 (registration) to Mehdi Panahipour (Respondent), owner of Pars  
9 Tech. Respondent's registration was in full force and effect at all times relevant to the charges  
10 brought herein and will expire on April 30, 2013, unless renewed.

11 3. On or about June 2, 2009, the Bureau issued Lamp Station License Number  
12 LS257965 to Respondent. The Lamp Station License was in full force and effect at all times  
13 relevant to the charges brought herein and will expire on April 30, 2013, unless renewed.

14 4. On or about June 2, 2009, the Bureau issued Brake Station License Number  
15 BS257965 to Respondent. The Brake Station License was in full force and effect at all times  
16 relevant to the charges brought herein and will expire on April 30, 2013, unless renewed.

17 **Mehdi Panahipour**

18 5. In or about 2005, the Bureau issued Lamp Adjuster License Number LA144216,  
19 class A to Respondent. The Lamp Adjuster License will expire on February 28, 2014, unless  
20 renewed.

21 6. In or about 2005, the Bureau issued Brake Adjuster License Number BA144216,  
22 class C to Respondent. The Brake Adjuster License will expire on February 28, 2014, unless  
23 renewed.

24 **Alireza Mahdiyar**

25 7. On or about March 9, 2009, the Bureau issued Lamp Adjuster License Number  
26 LA630878, class A to Alireza Mahdiyar (Respondent Mahdiyar). The Lamp Adjuster License  
27 will expire on May 31, 2016, unless renewed.

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1 (h) Violates or attempts to violate the provisions of this chapter relating to  
2 the particular activity for which he or she is licensed.

3 (i) Is convicted of a violation of Section 551 of the Penal Code.

4 19. Section 9889.16 states:

5 Whenever a licensed adjuster in a licensed station upon an inspection or  
6 after an adjustment, made in conformity with the instructions of the bureau,  
7 determines that the lamps or the brakes upon any vehicle conform with the  
8 requirements of the Vehicle Code, he shall, when requested by the owner or  
9 driver of the vehicle, issue a certificate of adjustment on a form prescribed by the  
10 director, which certificate shall contain the date of issuance, the make and  
11 registration number of the vehicle, the name of the owner of the vehicle, and the  
12 official license of the station.

#### 13 REGULATORY PROVISIONS

14 20. California Code of Regulations (CCR), Section 3316 states, in pertinent part:

15 .....  
16 (d) Effective April 1, 1999, licensed stations shall purchase certificates  
17 of adjustment from the bureau for a fee of three dollars and fifty cents (\$3.50)  
18 each and shall not purchase or otherwise obtain such certificates from any other  
19 source. Full payment is required at the time certificates are ordered. Certificates  
20 are not exchangeable following delivery. A licensed station shall not sell or  
21 otherwise transfer unused certificates of adjustment. Issuance of a lamp  
22 adjustment certificate shall be in accordance with the following provisions:

23 .....  
24 (2) Where all of the lamps, lighting equipment, and related  
25 electrical systems on a vehicle have been inspected and found to be in  
26 compliance with all requirements of the Vehicle Code and bureau  
27 regulations, the certificate shall certify that the entire system meets all of  
28 those requirements.

29 .....  
30 21. CCR Section 3321 states, in pertinent part:

31 The operation of official brake adjusting stations shall be subject to the  
32 following provisions:

33 .....  
34 (c) Effective April 1, 1999, licensed stations shall purchase certificates  
35 of adjustment from the bureau for a fee of three dollars and fifty cents (\$3.50) and  
36 shall not purchase or otherwise obtain such certificates from any other source. A  
37 licensed station shall not sell or otherwise transfer unused certificates of  
38

1 adjustment. Full payment is required at the time certificates are ordered.  
2 Certificates are not exchangeable following delivery. Issuance of a brake  
3 adjustment certificate shall be in accordance with the following provisions:

4 (2) Where the entire brake system on any vehicle has been  
5 inspected or tested and found to be in compliance with all requirements of the  
6 Vehicle Code and bureau regulations, and the vehicle has been road-tested, the  
7 certificate shall certify that the entire system meets all such requirements.

8 22. CCR Section 3356 states, in pertinent part:

9 (a) All invoices for service and repair work performed, and parts  
10 supplied, as provided for in Section 9884.8 of the Business and Professions Code,  
11 shall comply with the following:

12 (1) The invoice shall show the automotive repair dealer's  
13 registration number and the corresponding business name and address as shown in  
14 the Bureau's records. If the automotive repair dealer's telephone number is shown,  
15 it shall comply with the requirements of subsection (b) of Section 3371 of this  
16 chapter.

17 (2) The invoice shall separately list, describe and identify all of  
18 the following:

19 (A) All service and repair work performed, including all  
20 diagnostic and warranty work, and the price for each described service and repair.

21 (B) Each part supplied, in such a manner that the customer  
22 can understand what was purchased, and the price for each described part. The  
23 description of each part shall state whether the part was new, used, reconditioned,  
24 rebuilt, or an OEM crash part, or a non-OEM aftermarket crash part.

25 (C) The subtotal price for all service and repair work  
26 performed.

27 (D) The subtotal price for all parts supplied, not including  
28 sales tax.

(E) The applicable sales tax, if any.

#### 24 COST RECOVERY

25 23. Section 125.3 provides, in pertinent part, that a Board may request the  
26 administrative law judge to direct a licentiate found to have committed a violation or violations  
27 of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
28 enforcement of the case.

1 UNDERCOVER OPERATION #1: 1999 HONDA ACCORD

2 24. On December 15, 2011, an undercover operator of the Bureau ("operator") took  
3 the Bureau's 1999 Honda Accord (Accord) to Respondent's facility, Pars Tech, at 9:15 a.m. and  
4 told Respondent's technician that she needed a brake and lamp inspection and certificates for the  
5 vehicle. Respondent's technician told the operator that certifications would cost her \$60.00. The  
6 front brake rotors on the Bureau-documented vehicle were machined to exceed the  
7 manufacturer's brake rotor minimum thickness specifications. The driver side headlamp was  
8 misadjusted and the rear license plate lamp was made to be non-functional with a burned out  
9 bulb. The vehicle's odometer reading was 112,731 miles when she brought it to Respondent's  
10 facility. Respondent's technician handed the operator a blank auto repair order and told her to fill  
11 out the spaces for name and address and to sign it. Respondent's technician then took the repair  
12 order and car keys, then drove the Accord to the back of the building. Ten minutes later  
13 Respondent's technician showed the operator a broken license plate light bulb and said that it  
14 would cost her another \$10.00 for him to fix it. After another ten minutes, Respondent's  
15 technician informed the operator that the job was complete. Respondent's technician then filled  
16 out the brake and lamp certificates, wrote license number BA00630878 on the Brake Adjustment  
17 Certificate and license number LA00630878 on the Lamp Adjustment Certificate, signed the  
18 certificates and the repair order and collected \$70.00. Thereafter, Respondent's technician  
19 returned the keys and provided the operator a copy of the repair order, which was dated  
20 December 14, 2011. The operator asked if there was anything else she needed and Respondent's  
21 technician provided Certificate of Brake Adjustment No. [REDACTED] and Certificate of Lamp  
22 Adjustment No. [REDACTED]. The operator left the facility at or about 9:35 a.m. with the  
23 Accord's odometer reading remaining at 112,731 miles.

24 25. On January 4, 2012, a Bureau representative (representative) inspected the vehicle  
25 and found that the driver's side headlamp remained improperly aimed. The representative also  
26 found the tamper indicators undisturbed showing no headlamp adjustment was even attempted.  
27 Further, the representative found the right front and the rear wheel tamper indicators to be intact.

28 ///

1 Both front undersized brake rotors remained in place showing neither inspection nor adjustment  
2 on these wheels was done properly as stated on the certificate.

3 **FIRST CAUSE FOR DISCIPLINE**

4 **(Untrue or Misleading Statements)**

5 26. Respondent's registration is subject to disciplinary action pursuant to Code  
6 section 9884.7, subdivision (a)(1), in that he made or authorized statements which he knew or in  
7 the exercise of reasonable care should have known to be untrue or misleading, as follows:

8 a. Respondent certified under penalty of perjury on Brake Certificate No.  
9 [REDACTED] that the applicable inspection was performed on the brake system on the Bureau's  
10 1999 Honda Accord. In fact, Respondent failed to inspect the brakes on the vehicle.

11 b. Respondent certified under penalty of perjury on Brake Certificate No.  
12 [REDACTED] that the front brake rotors on the Bureau's 1999 Honda Accord were in a  
13 satisfactory condition. In fact, the front brake rotors had been machined to exceed the  
14 manufacturer's brake rotor minimum thickness specifications.

15 c. Respondent certified under penalty of perjury on Brake Certificate No.  
16 [REDACTED] that the Bureau's 1999 Honda Accord had a stopping distance of 20 feet from a  
17 speed of 20 miles per hour as a result of a road-test. In fact, Respondent never road tested the  
18 vehicle.

19 d. Respondent certified under penalty of perjury on Lamp Certificate No.  
20 [REDACTED] that the applicable adjustment had been performed on the lighting system on the  
21 Bureau's 1999 Honda Accord. In fact, the driver's side headlamp remained improperly aimed.

22 **SECOND CAUSE FOR DISCIPLINE**

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

24 27. Respondent's registration is subject to disciplinary action pursuant to Code  
25 section 9889.3, subdivision (d), in that he committed acts constituting dishonesty, fraud, or deceit  
26 whereby another is injured. Respondent obtained payment from the operator for performing the  
27 applicable inspections, adjustments, or repairs of the brake and lighting systems on the Bureau's  
28 1999 Honda Accord as specified by the Bureau and in accordance with the Vehicle Code. In

1 fact, Respondent failed to perform the necessary inspections, adjustments, and repairs in  
2 compliance with Bureau Regulations or the Vehicle Code.

3 **THIRD CAUSE FOR DISCIPLINE**

4 (Issuance of Certificates to a Non-Conforming Vehicle)

5 28. Respondent's registration is subject to disciplinary action pursuant to Code  
6 section 9884.7, subdivision (a)(6), in that he failed to comply with section 9889.16 of that Code  
7 in the following material respects: Respondent issued Brake Certificate No. [REDACTED] and  
8 Lamp Certificate No. [REDACTED] as to the Bureau's 1999 Honda Accord when the vehicle was  
9 not in compliance with Bureau Regulations or the requirements of the Vehicle Code.

10 **FOURTH CAUSE FOR DISCIPLINE**

11 (Violation of Regulations)

12 29. Respondent's registration is subject to disciplinary action pursuant to Code  
13 section 9884.7, subdivision (a)(6), in that he failed to comply with provisions of California Code  
14 of Regulations, title 16, in the following material respects:

15 a. **Section 3316, subdivision (d)(2)**: Respondent issued Lamp Certificate  
16 No. [REDACTED] as to the Bureau's 1999 Honda Accord when all of the lamps, lighting  
17 equipment, and/or related electrical systems on the vehicle were not in compliance with Bureau  
18 regulations.

19 b. **Section 3321, subdivision (c)(2)**: Respondent issued Brake Certificate  
20 No. [REDACTED] as to the Bureau's 1999 Honda Accord when the brake system on the vehicle  
21 had not been completely tested or inspected.

22 c. **Section 3556**: Respondent failed to show in the invoice for service and  
23 repair work performed, and parts supplied, the automotive repair dealer's registration number in  
24 compliance with the provisions of section 9884.8.

25 **FIFTH CAUSE FOR DISCIPLINE**

26 (Failure to State the Repair Requested)

27 30. Respondent's registration is subject to disciplinary action pursuant to Code  
28 section 9884.7, subdivision (a)(2), in that he caused or allowed the operator to sign the work

1 order which did not state the repairs requested by the customer on the Bureau's 1999 Honda  
2 Accord.

3 **SIXTH CAUSE FOR DISCIPLINE**

4 (Failure to Provide Signed Copy of Document to Customer)

5 31. Respondent's registration is subject to disciplinary action pursuant to Code  
6 section 9884.7, subdivision (a)(3), in that he failed to give to the operator a copy of the repair  
7 order requiring the operator's signature, as soon as the operator signed the document.

8 **SEVENTH CAUSE FOR DISCIPLINE**

9 (Failure to Document Additional Repair Authorization and Provide a Written Estimate)

10 32. Respondent's registration is subject to disciplinary action pursuant to Code  
11 section 9884.7, subdivision (a)(6), in that he failed to comply with the Code in the following  
12 material respects:

13 a. **Section 9884.8:** Respondent failed to document the additional repair  
14 authorization to install the light bulb near the license plate.

15 b. **Section 9884.9, subdivision (a):** Respondent failed to give to the  
16 customer a written estimated price for labor and parts necessary for a specific job.

17 **EIGHTH CAUSE FOR DISCIPLINE**

18 (Issuance of Certificates to a Non-Conforming Vehicle)

19 33. Respondent's brake and lamp station licenses are subject to disciplinary action  
20 pursuant to Code section 9889.3, subdivisions (a) and (h), in that he failed to comply with  
21 section 9889.16 of that Code in the following material respects: Respondent issued Brake  
22 Certificate No. [REDACTED] and Lamp Certificate No. [REDACTED] as to the Bureau's 1999  
23 Honda Accord when the vehicle was not in compliance with Bureau Regulations or the  
24 requirements of the Vehicle Code.

25 **NINTH CAUSE FOR DISCIPLINE**

26 (Violation of Regulations)

27 34. Respondent's brake and lamp station licenses are subject to disciplinary action  
28 pursuant to Code section 9889.3, subdivision (c), in that he willfully made a false statement or

1 entry with regard to a material matter in the certificates of compliance, in violation of the  
2 provisions of California Code of Regulations, title 16, in the following material respects:

3 a. Section 3316, subdivision (d)(2): Respondent issued Lamp Certificate  
4 No. [REDACTED] as to the Bureau's 1999 Honda Accord when not all of the lamps, lighting  
5 equipment, and/or related electrical systems on the vehicle complied with Bureau regulations.

6 b. Section 3321, subdivision (c)(2): Respondent issued Brake Certificate  
7 No. [REDACTED] as to the Bureau's 1999 Honda Accord when the brake system on the vehicle  
8 had not been completely tested or inspected.

9 c. Section 3556: Respondent failed to show in the invoice for service and  
10 repair work performed, and parts supplied, the automotive repair dealer's registration number in  
11 compliance with the provisions of section 9884.8.

12 **TENTH CAUSE FOR DISCIPLINE**

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

14 35. Respondent's brake and lamp station licenses are subject to disciplinary action  
15 pursuant to Code section 9889.3, subdivision (d), in that he committed acts constituting  
16 dishonesty, fraud, or deceit whereby another is injured. Respondent obtained payment from the  
17 operator for performing the applicable inspections, adjustments, or repairs of the brake and  
18 lighting systems on the Bureau's 1999 Honda Accord as specified by the Bureau and in  
19 accordance with the Vehicle Code. In fact, Respondent failed to perform the necessary  
20 inspections, adjustments, and repairs in compliance with Bureau Regulations or the Vehicle  
21 Code.

22 **ELEVENTH CAUSE FOR DISCIPLINE**

23 **(Issuance of Certificates to a Non-Conforming Vehicle)**

24 36. Respondent Mahdiyar's brake and lamp adjuster licenses are subject to  
25 disciplinary action pursuant to Code section 9889.3, subdivisions (a) and (h), in that he failed to  
26 comply with section 9889.16 of that Code in the following material respects: Respondent issued  
27 Brake Certificate No. [REDACTED] and Lamp Certificate No. [REDACTED] as to the Bureau's 1999

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1 Honda Accord when the vehicle was not in compliance with Bureau Regulations or the  
2 requirements of the Vehicle Code.

3 **TWELFTH CAUSE FOR DISCIPLINE**

4 (Violation of Regulations)

5 37. Respondent Mahdiyar's brake and lamp adjuster licenses are subject to  
6 disciplinary action pursuant to Code section 9889.3, in that he willfully made false statement or  
7 entry with regard to a material matter in the certificates of compliance, in violation of the  
8 provisions of California Code of Regulations, title 16, in the following material respects:

9 a. **Section 3316, subdivision (d)(2)**: Respondent Mahdiyar issued Lamp  
10 Certificate No. [REDACTED] as to the Bureau's 1999 Honda Accord when not all of the lamps,  
11 lighting equipment, and/or related electrical systems on the vehicle complied with Bureau  
12 regulations.

13 b. **Section 3321, subdivision (c)(2)**: Respondent Mahdiyar issued Brake  
14 Certificate No. [REDACTED] as to the Bureau's 1999 Honda Accord when the brake system on the  
15 vehicle had not been completely tested or inspected.

16 c. **Section 3556**: Respondent Mahdiyar failed to show in the invoice for  
17 service and repair work performed, and parts supplied, the automotive repair dealer's registration  
18 number in compliance with the provisions of section 9884.8.

19 **UNDERCOVER OPERATION #2: 1998 TOYOTA CAMRY**

20 38. On March 13, 2012, an undercover operator of the Bureau ("operator") took the  
21 Bureau's 1998 Toyota Camry (Camry) to Respondent's facility, Pars Tech, at 9:10 a.m. and told  
22 Respondent's technician that she needed a brake and lamp inspection and certificates for the  
23 vehicle, which her boyfriend was fixing up to resell. Respondent's technician told the operator  
24 that certifications would cost \$50.00 for regular customers. The right rear brake drum on the  
25 Bureau-documented vehicle was intentionally machined to exceed the manufacturer's drum  
26 maximum diameter specification. The right front brake rotor was intentionally machined to  
27 exceed the manufacturer's minimum thickness specification. The front headlamps were  
28 intentionally misadjusted, and the right rear back up lamp and the left rear tail light were

1 intentionally made to be non-functional. The vehicle's odometer reading was 150,705 miles  
2 when the operator brought the Camry to Respondent's shop. Respondent's technician handed the  
3 operator a blank auto repair order and told her to fill out the spaces for name and address and to  
4 sign it. The required price estimate, job description, and mileage were not preindicated on the job  
5 order, which the operator signed. She was not given a copy of the repair order. Respondent's  
6 technician then took the repair order and car keys, and drove the Camry to the repair bay. Several  
7 minutes later, Respondent's technician showed the operator a broken rear light bulb and said that  
8 it would cost her another \$10.00 for him to replace it. After a few more minutes, Respondent's  
9 technician informed the operator that the job was complete. Respondent's technician wrote  
10 license number BA00630878 on the Brake Adjustment Certificate and license number  
11 LA00630878 on the Lamp Adjustment Certificate, signed the certificates, gave the operator  
12 Certificate of Brake Adjustment No. [REDACTED] Certificate of Lamp Adjustment No.  
13 [REDACTED], and the now completed repair order, collected \$60.00, and returned the keys to the  
14 operator. The repair order dated March 13, 2012 showed \$30.00 for the brake certificate and  
15 another \$30.00 for the lamp certificate, but did not show the part or labor cost for the bulb  
16 replacement. The operator left the facility at or about 9:25 a.m. with the Camry's odometer  
17 reading remaining at 150,705 miles.

18 39. On March 14, 2012, a Bureau representative (representative) inspected the vehicle  
19 and found that the headlamps aims were not within specifications. The representative also found  
20 the tamper seals on the headlamp adjustment screws still intact, showing the headlamp  
21 adjustment was never even attempted. The left rear tail light was still inoperable although the  
22 right rear back up lamp had been replaced and operated correctly. The right side wheel tamper  
23 indicators that detect wheel removal were intact, indicating that those wheels had not been  
24 removed in order to make any measurement of the brake rotor or drum as stated on the  
25 certificate. The right rear drum was oversized beyond the manufacturer's maximum specification  
26 and the right front brake rotor was undersized beyond the manufacturer's minimum  
27 specification.

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1 THIRTEENTH CAUSE FOR DISCIPLINE

2 (Untrue or Misleading Statements)

3 40. Respondent's registration is subject to disciplinary action pursuant to Code  
4 section 9884.7, subdivision (a)(1), in that he made or authorized statements which he knew or in  
5 the exercise of reasonable care should have known to be untrue or misleading, as follows:

6 a. Respondent certified under penalty of perjury on Brake Certificate No.  
7 [REDACTED] that the applicable inspection was performed on the brake system on the Bureau's  
8 1998 Toyota Camry. In fact, Respondent failed to properly inspect the brakes on the vehicle.

9 b. Respondent certified under penalty of perjury on Brake Certificate No.  
10 [REDACTED] that the front brake rotors on the Bureau's 1998 Toyota Camry were in a satisfactory  
11 condition. In fact, the front brake rotors had been machined to exceed the manufacturer's brake  
12 rotor minimum thickness specifications.

13 c. Respondent certified under penalty of perjury on Brake Certificate No.  
14 [REDACTED] that the Bureau's 1998 Toyota Camry had a stopping distance of 15 feet from a  
15 speed of 20 miles per hour as a result of a road-test. In fact, Respondent never road tested the  
16 vehicle.

17 d. Respondent certified under penalty of perjury on Lamp Certificate No.  
18 [REDACTED] that the applicable adjustment had been performed on the lighting system on the  
19 Bureau's 1998 Toyota Camry. In fact, both front headlamps remained improperly aimed and left  
20 rear tail light was not operable.

21 FOURTEENTH CAUSE FOR DISCIPLINE

22 (Dishonesty, Fraud, or Deceit)

23 41. Respondent's registration is subject to disciplinary action pursuant to Code  
24 section 9889.3, subdivision (d), in that he committed acts constituting dishonesty, fraud, or deceit  
25 whereby another is injured. Respondent obtained payment from the operator for performing the  
26 applicable inspections, adjustments, or repairs of the brake and lighting systems on the Bureau's  
27 1998 Toyota Camry as specified by the Bureau and in accordance with the Vehicle Code. In fact,

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1 Respondent failed to perform the necessary inspections, adjustments, and repairs in compliance  
2 with Bureau Regulations or the Vehicle Code.

3 **FIFTEENTH CAUSE FOR DISCIPLINE**

4 (Issuance of Certificates to a Non-Conforming Vehicle)

5 42. Respondent's registration is subject to disciplinary action pursuant to Code  
6 section 9884.7, subdivision (a)(6), in that he failed to comply with section 9889.16 of that Code  
7 in the following material respects: Respondent issued Brake Certificate No. [REDACTED] and  
8 Lamp Certificate No. [REDACTED] as to the Bureau's 1998 Toyota Camry when the vehicle was  
9 not in compliance with Bureau Regulations or the requirements of the Vehicle Code.

10 **SIXTEENTH CAUSE FOR DISCIPLINE**

11 (Violation of Regulations)

12 43. Respondent's registration is subject to disciplinary action pursuant to Code  
13 section 9884.7, subdivision (a)(6), in that he failed to comply with provisions of California Code  
14 of Regulations, title 16, in the following material respects:

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

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

22 c. **Section 3556**: Respondent failed to show in the invoice for service and  
23 repair work performed, and parts supplied, the automotive repair dealer's registration number in  
24 compliance with the provisions of section 9884.8.

25 **SEVENTEENTH CAUSE FOR DISCIPLINE**

26 (Failure to State the Repair Requested)

27 44. Respondent's registration is subject to disciplinary action pursuant to Code  
28 section 9884.7, subdivision (a)(2), in that he caused or allowed the operator to sign the work

1 order, which did not state the repairs requested by the customer on the Bureau's 1998 Toyota  
2 Camry.

3 **EIGHTEENTH CAUSE FOR DISCIPLINE**

4 **(Failure to Provide Signed Copy of Document to Customer)**

5 45. Respondent's registration is subject to disciplinary action pursuant to Code  
6 section 9884.7, subdivision (a)(3), in that he failed to give to the operator a copy of the repair  
7 order requiring the operator's signature, as soon as the operator signed the document.

8 **NINETEENTH CAUSE FOR DISCIPLINE**

9 **(Failure to Document Additional Repair Authorization and Provide a Written Estimate)**

10 46. Respondent's registration is subject to disciplinary action pursuant to Code  
11 section 9884.7, subdivision (a)(6), in that he failed to comply with the Code in the following  
12 material respects:

13 a. **Section 9884.8:** Respondent failed to document the additional repair  
14 authorization to install the light bulb near the license plate.

15 b. **Section 9884.9, subdivision (a):** Respondent failed to give to the  
16 customer a written estimated price for labor and parts necessary for a specific job.

17 **TWENTIETH CAUSE FOR DISCIPLINE**

18 **(Issuance of Certificates to a Non-Conforming Vehicle)**

19 47. Respondent's brake and lamp station licenses are subject to disciplinary action  
20 pursuant to Code section 9889.3, subdivisions (a) and (h), in that he failed to comply with  
21 section 9889.16 of that Code in the following material respects: Respondent issued Brake  
22 Certificate No. [REDACTED] and Lamp Certificate No. [REDACTED] as to the Bureau's 1998  
23 Toyota Camry when the vehicle was not in compliance with Bureau Regulations or the  
24 requirements of the Vehicle Code.

25 **TWENTY-FIRST CAUSE FOR DISCIPLINE**

26 **(Violation of Regulations)**

27 48. Respondent's brake and lamp station licenses are subject to disciplinary action  
28 pursuant to Code section 9889.3, subdivision (c), in that he willfully made a false statement or

1 entry with regard to a material matter in the certificates of compliance, in violation of the  
2 provisions of California Code of Regulations, title 16, in the following material respects:

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

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

10 c. Section 3556: Respondent failed to show in the invoice for service and  
11 repair work performed, and parts supplied, the automotive repair dealer's registration number in  
12 compliance with the provisions of section 9884.8.

13 **TWENTY-SECOND CAUSE FOR DISCIPLINE**

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

15 49. Respondent's brake and lamp station licenses are subject to disciplinary action  
16 pursuant to Code section 9889.3, subdivision (d), in that he committed acts constituting  
17 dishonesty, fraud, or deceit whereby another is injured. Respondent obtained payment from the  
18 operator for performing the applicable inspections, adjustments, or repairs of the brake and  
19 lighting systems on the Bureau's 1998 Toyota Camry as specified by the Bureau and in  
20 accordance with the Vehicle Code. In fact, Respondent failed to perform the necessary  
21 inspections, adjustments, and repairs in compliance with Bureau Regulations or the Vehicle  
22 Code.

23 **TWENTY-THIRD CAUSE FOR DISCIPLINE**

24 **(Issuance of Certificates to a Non-Conforming Vehicle)**

25 50. Respondent Mahdiyar's brake and lamp adjuster licenses are subject to  
26 disciplinary action pursuant to Code section 9889.3, subdivisions (a) and (h), in that he failed to  
27 comply with section 9889.16 of that Code in the following material respects: Respondent issued  
28 Brake Certificate No. [REDACTED] and Lamp Certificate No. [REDACTED] as to the Bureau's 1998

1 Toyota Camry when the vehicle was not in compliance with Bureau Regulations or the  
2 requirements of the Vehicle Code.

3 **TWENTY-FOURTH CAUSE FOR DISCIPLINE**

4 **(Violation of Regulations)**

5 51. Respondent Mahdiyari's brake and lamp adjuster licenses are subject to  
6 disciplinary action pursuant to Code section 9889.3, subdivision (c), in that he willfully made  
7 false statement or entry with regard to a material matter in the certificates of compliance, in  
8 violation of the provisions of California Code of Regulations, title 16, in the following material  
9 respects:

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

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

17 c. **Section 3556**: Respondent failed to show in the invoice for service and  
18 repair work performed, and parts supplied, the automotive repair dealer's registration number in  
19 compliance with the provisions of section 9884.8.

20 **OTHER MATTERS**

21 52. Pursuant to Code section 9884.7, subdivision (c), the Director may suspend,  
22 revoke or place on probation the registration for all places of business operated in this state by  
23 Respondent Mehdi Panahipour, owner of Pars Tech, upon a finding that Respondent has, or is,  
24 engaged in a course of repeated and willful violations of the laws and regulations pertaining to an  
25 automotive repair dealer.

26 53. Pursuant to Code section 9889.9, if Lamp Station License Number LS 257965 or  
27 Brake Station License Number BS 257965, issued to Respondent Mehdi Panahipour, owner of  
28 Pars Tech, is revoked or suspended, any additional license issued under Articles 5 and 6 of

1 Chapter 20.3 of the Business & Professions Code in the name of said licensee may be likewise  
2 revoked or suspended by the Director.

3 54. Pursuant to Code section 9889.9, if Brake Adjuster License Number BA 630878  
4 or Lamp Adjuster License Number LA 630878, issued to Respondent Alireza Mahdiyar, is  
5 revoked or suspended, any additional license issued under Articles 5 and 6 of Chapter 20.3 of the  
6 Business & Professions Code in the name of said licensee may be likewise revoked or suspended  
7 by the Director.

8 **PRAYER**

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

11 1. Revoking or suspending Automotive Repair Dealer Registration Number 257965,  
12 issued to Mehdi Panahipour, owner of Pars Tech;

13 2. Revoking or suspending any other automotive repair dealer registration issued to  
14 Mehdi Panahipour;

15 3. Revoking or suspending Lamp Station License Number LS 257965, issued to  
16 Mehdi Panahipour, owner of Pars Tech;

17 4. Revoking or suspending Brake Station License Number BS 257965, issued to  
18 Mehdi Panahipour, owner of Pars Tech;

19 5. Revoking or suspending Lamp Adjuster License Number LA 144216, issued to  
20 Mehdi Panahipour;

21 6. Revoking or suspending Brake Adjuster License Number BA 144216, issued to  
22 Mehdi Panahipour;

23 7. Revoking or suspending any additional license issued under Article 5 and 6 of  
24 Chapter 20.3 of the Business and Professions Code in the name of Mehdi Panahipour;

25 8. Revoking or suspending Lamp Adjuster License Number LA 630878, issued to  
26 Alireza Mahdiyar;

27 9. Revoking or suspending Brake Adjuster License Number BA 630878, issued to  
28 Alireza Mahdiyar;

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10. Revoking or suspending any additional license issued under Article 5 and 6 of Chapter 20.3 of the Business and Professions Code in the name of Alireza Mahdiyar;

11. Ordering Mehdi Panahipour, individually, and as owner of Pars Tech, and Alireza Mahdiyar to pay the Director of Consumer Affairs the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

12. Taking such other and further action as deemed necessary and proper.

DATED: 9/19/12

John Wallauch by Doug Balatt  
JOHN WALLAUCH  
Chief  
Bureau of Automotive Repair  
Department of Consumer Affairs  
State of California  
Complainant

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