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

In the Matter of the Accusation Against:

**JOE'S SMOG TEST ONLY
YOUSEF K. ZEIT, OWNER
147 East Baseline Street, #E
San Bernardino, CA 92410**

**Automotive Repair Dealer Registration No.
ARD 266397
Smog Check, Test Only, Station License No.
TC 266397**

**YOUSEF K. ZEIT
3845 Polk Street, Apt. # 57
Riverside, CA 92505**

**Advanced Emission Specialist Technician
License No. EA 632736 (to be redesignated
upon renewal as EO 632736 and/or EI
632736)**

Respondent.

Case No. 79/13-05

OAH No. 2013020145

DEFAULT DECISION AND ORDER

[Gov. Code, §11520]

FINDINGS OF FACT

1. On or about September 30, 2013, Complainant Patrick Dorais, in his official capacity as the Acting Chief of the Bureau of Automotive Repair, Department of Consumer Affairs, filed

1 First Amended Accusation No. 79/13-05 against Joe's Smog Test Only, Yousef K. Zeit, Owner
2 and Yousef K. Zeit, Technician (Respondent) before the Director of Consumer Affairs. (First
3 Amended Accusation attached as Exhibit A)

4 2. On or about October 1, 2013, Respondent was served by Certified and First Class
5 Mail copies of the First Amended Accusation No. 79/13-05 and Supplemental Statement to
6 Respondent's addresses of record which, pursuant to Business and Professions Code section 136,
7 are required to be reported and maintained with the Bureau. Respondent's addresses of record
8 were and are: 147 East Baseline Street #E, San Bernardino, CA 92410 and 3845 Polk Street, Apt.
9 57, Riverside, CA 92505. Respondent's attorney was served with the First Amended Accusation
10 at the same time.

11 3. On or about August 26, 2011, the Bureau of Automotive Repair (BAR) issued
12 Automotive Repair Dealer No. ARD 266397 to Yousek K. Zeit, Owner of Joe's Smog Test Only.
13 (Respondent) The Automotive Repair Dealer was in full force and effect at all times relevant to
14 the charges brought in First Amended Accusation No. 79/13-05. Respondent's registration
15 expired on August 31, 2013, and has not been renewed. This lapse in licensure, however,
16 pursuant to Business and Professions Code section 9884.13, does not deprive the Director of her
17 authority to institute or continue this disciplinary proceeding.

18 4. On or about October 12, 2011, the BAR issued Smog Check, Test Only, Station No.
19 TC 266397 to Respondent. The Smog Check, Test Only, Station License was in full force and
20 effect at all times relevant to the charges brought in First Amended Accusation No. 79/13-05.
21 Respondent's smog check station license expired on August 31, 2013, and has not been renewed.
22 This lapse in licensure, however, pursuant to Business and Professions Code section 9884.13,
23 does not deprive the Director of her authority to institute or continue this disciplinary proceeding

24 5. On or about December 10, 2010, the Director issued Advanced Emission Specialist
25 Technician License Number EA 632736 to Respondent Zeit. Respondent's technician license
26 expired on December 31, 2012, and has not been renewed. Upon renewal of the license, the
27 license will be redesignated as EO 632736 and/or EI 632736. This lapse in licensure, however,
28

1 pursuant to Business and Professions Code section 9884.13, does not deprive the Director of her
2 authority to institute or continue this disciplinary proceeding.

3 6. On or about July 18, 2012, Complainant John Wallauch, in his official capacity as the
4 Chief of the Bureau of Automotive Repair, Department of Consumer Affairs, filed Accusation
5 No. 79/13-05 against Joe's Smog Test Only, Yousef K. Zeit, Owner and Smog Technician
6 Yousef K. Zeit (Respondent) before the Director of Consumer Affairs

7 7. On or about July 25, 2012, Respondent was served by Certified and First Class Mail
8 copies of the Accusation No. 79/13-05, Statement to Respondent, Notice of Defense, Request for
9 Discovery, and Discovery Statutes (Government Code sections 11507.5, 11507.6, and 11507.7) at
10 Respondent's addresses of record which, pursuant to Business and Professions Code section 136,
11 is required to be reported and maintained with the Bureau. Respondent's addresses of record were
12 and are: 147 East Baseline Street #E, San Bernardino, CA 92410 and 3845 Polk Street, Apt. 57,
13 Riverside, CA 92505.

14 8. Service of the First Amended Accusation was effective as a matter of law under the
15 provisions of Government Code section 11505, subdivision (c) and/or Business & Professions
16 Code section 124.

17 9. On or about August 1, 2012, Respondent, through counsel, signed and returned a
18 Notice of Defense, requesting a hearing in this matter. A Notice of Hearing was served by mail at
19 Respondent's addresses of record and upon his attorney and it informed them that an
20 administrative hearing in this matter was scheduled for October 16, 2013. On October 11, 2013
21 Respondent's attorney withdrew from his representation of Respondent. Respondent failed to
22 appear at the hearing.

23 10. Government Code section 11506 states, in pertinent part:

24 (c) The respondent shall be entitled to a hearing on the merits if the respondent
25 files a notice of defense, and the notice shall be deemed a specific denial of all parts
26 of the accusation not expressly admitted. Failure to file a notice of defense shall
constitute a waiver of respondent's right to a hearing, but the agency in its discretion
may nevertheless grant a hearing.

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1 11. California Government Code section 11520 states, in pertinent part:

2 (a) If the respondent either fails to file a notice of defense or to appear at the
3 hearing, the agency may take action based upon the respondent's express admissions
4 or upon other evidence and affidavits may be used as evidence without any notice to
5 respondent.

6 12. Pursuant to its authority under Government Code section 11520, the Director after
7 having reviewed the proofs of service, dated July 25, 2012, for the Accusation; dated February 8,
8 2013, for the Notice of Hearing; dated October 1, 2013 for the First Amended Accusation; signed
9 by J. Mejia, finds Respondent is in default. The Director will take action without further hearing
10 and, based on First Amended Accusation, No. 79/13-05, proof of service and on the Affidavit of
11 Bureau Representative David Martindelcampo, finds that the allegations in the First Amended
12 Accusation are true.

13 **DETERMINATION OF ISSUES**

14 1. Based on the foregoing findings of fact, Respondent Yousek K. Zeit, dba Joe's Smog
15 Test Only, has subjected his Automotive Repair Dealer Registration No. ARD 266397, his Smog
16 Check-Test Only Station License No. TC 266397 and his Advanced Emission Specialist
17 Technician License No. EA 632736 to discipline.

18 2. The agency has jurisdiction to adjudicate this case by default.

19 3. The Director of Consumer Affairs is authorized to revoke Respondent's Automotive
20 Repair Dealer License No. ARD 266397, Smog Check-Test Only Station License No. TC
21 266397, and Advanced Emission Specialist Technician License No. EA 632736, based upon the
22 following violations alleged in the First Amended Accusation which are supported by the
23 evidence contained in the affidavit of Bureau Representative David Martindelcampo in this case:

24 a. Respondent committed multiple violations of Business & Professions Code section
25 9884.7 and Health & Safety Code section 44072.2, in that a total of nine vehicles were clean
26 plugged at Respondent's shop, by Respondent using his technician license between, October 11,
27 2011 and March 26, 2012.

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ORDER

IT IS SO ORDERED that Automotive Repair Dealer Registration No. ARD 266397, Smog Check-Test Only Station License No. TC 266397 and Advanced Emission Specialist Technician License No. EA 632736, heretofore issued to Respondent, Yousef K. Zeit, are revoked.

Pursuant to Government Code section 11520, subdivision (c), Respondent may serve a written motion requesting that the Decision be vacated and stating the grounds relied on within seven (7) days after service of the Decision on Respondent. The motion should be sent to the Bureau of Automotive Repair, ATTN: William D. Thomas, 10949 North Mather Blvd., Rancho Cordova, CA 95670. The agency in its discretion may vacate the Decision and grant a hearing on a showing of good cause, as defined in the statute.

This Decision shall become effective on December 27, 2013.

It is so ORDERED November 27, 2013



DONALD CHANG
Assistant Chief Counsel
Department of Consumer Affairs

70770412.DOC
DOJ Matter ID:SD2012703601

Attachment:
Exhibit A: First Amended Accusation

Exhibit A

First Amended Accusation

1 KAMALA D. HARRIS
Attorney General of California
2 JAMES M. LEDAKIS
Supervising Deputy Attorney General
3 DAVID E. HAUSFELD
Deputy Attorney General
4 State Bar No. 110639
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5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
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7 Facsimile: (619) 645-2061
Attorneys for Complainant

8
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:
JOE'S SMOG TEST ONLY
13 **YOUSEF K. ZEIT, OWNER**
14 **147 East Baseline Street, #E**
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15 **Automotive Repair Dealer Registration No.**
ARD 266397
16 **Smog Check, Test Only, Station License No.**
TC 266397
17
18 **YOUSEF K. ZEIT**
3845 Polk Street, Apt. # 57
Riverside, CA 92505
19
20 **Advanced Emission Specialist Technician**
License No. EA 632736 (to be redesignated
21 **upon renewal as EO 632736 and/or EI**
632736)
22 Respondents.

Case No. 79/13-05
OAH No. 2013020145
FIRST AMENDED ACCUSATION

23
24 Complainant alleges:

25 **PARTIES**

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

1 11. Bus. & Prof. Code section 477 provides, in pertinent part, that "Board" includes
2 "bureau," "commission," "committee," "department," "division," "examining committee,"
3 "program," and "agency." "License" includes certificate, registration or other means to engage in
4 a business or profession regulated by the Bus. & Prof. Code.

5 12. Health & Saf. Code section 44072.2 states, in pertinent part:

6 The director may suspend, revoke, or take other disciplinary action against a
7 license as provided in this article if the licensee, or any partner, officer, or director
thereof, does any of the following:

8 (a) Violates any section of this chapter [the Motor Vehicle Inspection
9 Program (Health and Saf. Code § 44000, et seq.)] and the regulations adopted
pursuant to it, which related to the licensed activities.

10

11 (c) Violates any of the regulations adopted by the director pursuant to this
chapter.

12 (d) Commits any act involving dishonesty, fraud, or deceit whereby another
13 is injured.

14

15 13. Health & Saf. Code section 44072.8 states:

16 "When a license has been revoked or suspended following a hearing under this article, any
17 additional license issued under this chapter in the name of the licensee may be likewise revoked
or suspended by the director."

18 14. Health & Saf. Code section 44072.10 states, in pertinent part:

19

20 (c) The department shall revoke the license of any smog check technician or
21 station licensee who fraudulently certifies vehicles or participates in the fraudulent
inspection of vehicles. A fraudulent inspection includes, but is not limited to, all of
22 the following:

23

24 (4) Intentional or willful violation of this chapter or any regulation, standard,
or procedure of the department implementing this chapter.

25 15. Health & Saf. Code section 44012 provides, in pertinent part, that the test at the smog
26 check stations shall be performed in accordance with procedures prescribed by the department,
27 pursuant to Section 44013.

28 ///

1 **REGULATORY PROVISIONS**

2 16. California Code of Regulations, title 16, section 3340.24 (c), states:

3 "(c) The bureau may suspend or revoke the license of or pursue other legal action against a
4 licensee, if the licensee falsely or fraudulently issues or obtains a certificate of compliance or a
5 certificate of noncompliance."

6 17. California Code of Regulations, title 16, section 3340.30, states, in pertinent part:

7 "A smog check technician shall comply with the following requirements at all times while
8 licensed.

9 "(a) A licensed technician shall inspect, test and repair vehicles in accordance with section
10 44012 of the Health and Safety Code, section 44035 of the Health and Safety Code, and section
11 3340.42 of this article.

12 "..."

13 18. California Code of Regulations, title 16, section 3340.35, provides, in pertinent part,
14 that a licensed station shall issue a certificate of compliance . . . to the owner or operator of any
15 vehicle that has been inspected in accordance with the procedures specified in section 3340.42 of
16 this article and has all the required emission control equipment and devices installed and
17 functioning correctly.

18 19. California Code of Regulations, title 16, section 3340.41 (c), states:

19 "No person shall enter into the emissions inspection system any vehicle identification
20 information or emission control system identification data for any vehicle other than the one
21 being tested. Nor shall any person knowingly enter into the emissions inspection system any false
22 information about the vehicle being tested."

23 20. California Code of Regulations, title 16, section 3340.42, provides, in pertinent part,
24 that smog check stations and smog check technicians shall conduct tests and inspections in
25 accordance with the bureau's BAR-97 Emissions Inspection System Specifications referenced in
26 subsections (a) and (b) of Section 3340.17.

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1 **COST RECOVERY**

2 21. Section 125.3 of the Code provides, in pertinent part, that the Director may request
3 the administrative law judge to direct a licentiate found to have committed a violation or
4 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation
5 and enforcement of the case.

6 **VID DATA REVIEW**

7 22. In or about February 2012, the BAR initiated an investigation of Respondents based
8 on a review of information from the BAR's vehicle information database (VID), which indicated
9 that they may be engaging in fraudulent smog check inspections.

10 23. Beginning in February of 2012, a representative of the BAR conducted a detailed
11 review of VID data for all smog inspections performed at Respondent's automotive repair
12 dealership for the period of October 1, 2011 through March 26, 2012. The review showed a
13 pattern of OBD II² diagnostic trouble codes stored in the memory of the power train control
14 module (PCM) on different vehicles that received smog certificates in the six month period. The
15 BAR specifically examined the VID data, in detail, for nine (9) of the vehicles that were certified
16 from October 22, 2011 to March 9, 2012 and it was determined that none of them support the
17 OBD II code. Vehicles 1 through 9, set forth in Table 1, in paragraph 23 below, were all certified
18 with various pending codes stored in the PCM memory while the original equipment
19 manufacturer (OEM) service information shows these vehicles do not support the pending codes
20 stored in the PCM memory.

21 24. The BAR representative obtained information indicating that none of these codes
22 were applicable to the nine vehicles. The VID data also showed that the inspections on all of the
23 vehicles were performed under the technician license of Respondent Zeit. The BAR concluded

24 ² The On Board Diagnostic, generation II (OBD II) functional test is an automated
25 function of the BAR-97 analyzer. During the OBD II functional test, the technician is required to
26 connect an interface cable from the BAR-97 analyzer to a Diagnostic Link Connector (DLC)
27 which is located inside the vehicle. Through the DLC, the BAR-97 analyzer automatically
28 retrieves information from the vehicle's on-board computer about the status of the readiness
indicators, trouble codes, and the MIL (malfunction indicator light). If the vehicle fails the OBD
II functional test, it will fail the overall inspection.

1 that Respondent performed the smog inspections on the vehicles using a different vehicle(s)
 2 during the OBD II tests, a method known as clean-plugging,³ resulting in the issuance of
 3 fraudulent certificates of compliance for the vehicles that were tested as outlined in the following
 4 table.

5 **TABLE 1**

| Date & Time of Inspection | Vehicle Certified & License or Vin No. | Certificate No. |
|--------------------------------------|--|-----------------|
| 1. 10/22/2011 9:38 – 9:52 hours | 1999 Chevy C1500, 4DML043 | WZ898857C |
| 2. 12/12/2011 15:01 – 15:14 hours | 2001 Toyota Sienna, 4VCM487 | XB631059C |
| 3. 12/16/2011 11:24 – 11:39 hours | 1997 Volkswagen Jetta, 6EKG104 | XB631088C |
| 4. 1/7/2012 12:45 – 12:59 hours | 1998 Acura Integra, 4XVY044 | XB986584C |
| 5. 1/12/2012 12:58 – 13:06 hours | 2000 Dodge Neon, 4FVP765 | XD092367C |
| 6. 2/6/2012 12:29 – 12:42 hours | 1999 Dodge B1500, 5LHY450 | XD543357C |
| 7. 3/1/2012 16:45 – 16:55 hours | 2005 Chevy Express 2500, 7X39230 | XD992463C |
| 8. 3/2/2012 10:04 – 10:16 hours | 2002 Honda Civic, 4XNZ884 | XD992467C |
| 9. 3/9/2012 8:57 – 9:16 hours | 2000 Toyota Tacoma, 6G44918 | XF093534C |

17 **FIRST CAUSE FOR DISCIPLINE**

18 **(Untrue or Misleading Statements)**

19
 20 25. Respondent's dealer registration is subject to disciplinary action pursuant to Bus. &
 21 Prof. Code section 9884.7, subdivision (a)(1), in that Respondent made or authorized statements
 22 which he knew or in the exercise of reasonable care should have known to be untrue or
 23 misleading, as follows: Respondent certified that vehicles 1 through 9, identified in Table 1
 24 above, had passed inspection and were in compliance with applicable laws and regulations. In

25 ³ Clean-plugging is the use of the OBD II readiness monitor status and stored fault code
 26 (trouble code) status of a passing vehicle for the purpose of illegally issuing a smog certificate to
 27 another vehicle that is not in compliance due to a failure to complete the minimum number of self
 28 tests, known as monitors, or due to the presence of a stored fault code that indicates an emission
 control system or component failure.

1 fact, Respondent conducted the inspections on the vehicles using clean-plugging methods in that
2 he substituted or used different vehicles during the OBD II functional tests in order to issue smog
3 certificates of compliance for the vehicles, and did not actually test or inspect the vehicles as
4 required by Health & Saf. Code section 44012.

5 **SECOND CAUSE FOR DISCIPLINE**

6 **(Fraud)**

7 26. Respondent's dealer registration is subject to disciplinary action pursuant to Bus. &
8 Prof. Code section 9884.7, subdivision (a)(4), in that Respondent committed acts that constitute
9 fraud by issuing electronic smog certificates of compliance for vehicles 1 through 9, identified in
10 Table 1 above, without performing bona fide inspections of the emission control devices and
11 systems on the vehicles, thereby depriving the People of the State of California of the protection
12 afforded by the Motor Vehicle Inspection Program.

13 **THIRD CAUSE FOR DISCIPLINE**

14 **(Violations of Motor Vehicle Inspection Program)**

15 27. Respondent's smog check station license is subject to disciplinary action pursuant to
16 Health & Saf. Code section 44072.2, subdivision (a), in that Respondent failed to comply with the
17 following sections of that Code:

18 a. **Section 44012, subdivision (a):** Respondent failed to ensure that all emission control
19 devices and systems required by law for vehicles 1 through 9, identified in Table 1 above, were
20 installed and functioning correctly in accordance with test procedures.

21 b. **Section 44012, subdivision (f):** Respondent failed to ensure that the emission
22 control tests were performed on vehicles 1 through 9, identified in Table 1 above, in accordance
23 with procedures prescribed by the department.

24 c. **Section 44015, subdivision (b):** Respondent issued electronic smog certificates of
25 compliance for vehicles 1 through 9, identified in Table 1 above, without ensuring that the
26 vehicles were properly tested and inspected to determine if they were in compliance with Health
27 & Saf. Code section 44012.

28

1 d. **Section 44059:** Respondent willfully made false entries for electronic certificates of
2 compliance for vehicles 1 through 9, identified in Table 1 above, by certifying that the vehicles
3 had been inspected as required when, in fact, they had not.

4 **FOURTH CAUSE FOR DISCIPLINE**

5 **(Failure to Comply with Regulations Pursuant to the Motor Vehicle Inspection Program)**

6 28. Respondent's smog check station license is subject to disciplinary action pursuant to
7 Health & Saf. Code section 44072.2, subdivision (c), in that Respondent failed to comply with
8 provisions of California Code of Regulations, title 16, as follows:

9 a. **Section 3340.24, subdivision (c):** Respondent falsely or fraudulently issued
10 electronic smog certificates of compliance for vehicles 1 through 9, identified in Table 1 above.

11 b. **Section 3340.35, subdivision (c):** Respondent issued electronic smog certificates of
12 compliance for vehicles 1 through 9, identified in Table 1 above, even though the vehicles had
13 not been inspected in accordance with section 3340.42.

14 c. **Section 3340.42:** Respondent failed to ensure that the required smog tests were
15 conducted on vehicles 1 through 9, identified in Table 1 above, in accordance with the BAR's
16 specifications.

17 **FIFTH CAUSE FOR DISCIPLINE**

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

19 29. Respondent's smog check station license is subject to disciplinary action pursuant to
20 Health & Saf. Code section 44072.2, subdivision (d), in that Respondent committed dishonest,
21 fraudulent or deceitful acts whereby another is injured by issuing electronic smog certificates of
22 compliance for vehicles 1 through 9, identified in Table 1 above, without performing bona fide
23 inspections of the emission control devices and systems on the vehicles, thereby depriving the
24 People of the State of California of the protection afforded by the Motor Vehicle Inspection
25 Program.

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1 SIXTH CAUSE FOR DISCIPLINE

2 (Violations of Motor Vehicle Inspection Program)

3 30. Respondent Zeit's technician license is subject to disciplinary action pursuant to
4 Health & Saf. Code section 44072.2, subdivision (a), in that Respondent failed to comply with the
5 following sections of that Code:

6 a. **Section 44012, subdivision (a):** Respondent failed to ensure that all emission control
7 devices and systems required by law for vehicles 1 through 9, identified in Table 1 above, were
8 installed and functioning correctly in accordance with test procedures.

9 b. **Section 44012, subdivision (f):** Respondent failed to perform the emission control
10 tests on vehicles 1 through 9, identified in Table 1 above, in accordance with procedures
11 prescribed by the department.

12 c. **Section 44015, subdivision (b):** Respondent issued electronic smog certificates of
13 compliance for vehicles 1 through 9, identified in Table 1 above, without properly testing and
14 inspecting the vehicles to determine if they were in compliance with Health & Saf. Code section
15 44012.

16 d. **Section 44059:** Respondent willfully made false entries for electronic certificates of
17 compliance for vehicles 1 through 9, identified in Table 1 above, by certifying that the vehicles
18 had been inspected as required when, in fact, they had not.

19 SEVENTH CAUSE FOR DISCIPLINE

20 (Failure to Comply with Regulations Pursuant to the Motor Vehicle Inspection Program)

21 31. Respondent Zeit's technician license is subject to disciplinary action pursuant to
22 Health & Saf. Code section 44072.2, subdivision (c), in that Respondent failed to comply with
23 provisions of California Code of Regulations, title 16, as follows:

24 a. **Section 3340.24, subdivision (c):** Respondent falsely or fraudulently issued
25 electronic smog certificates of compliance for vehicles 1 through 9, identified in Table 1 above.

26 b. **Section 3340.30, subdivision (a):** Respondent failed to inspect and test vehicles 1
27 through 9, identified in Table 1 above, in accordance with Health & Saf. Code sections 44012 and
28 44035, and California Code of Regulations, title 16, section 3340.42.

1 c. **Section 3340.41, subdivision (c):** Respondent entered into the emissions inspection
2 system vehicle identification information or emission control system identification data for a
3 vehicle other than the one being tested for vehicles 1 through 9, identified in Table 1 above.

4 d. **Section 3340.42:** Respondent failed to conduct the required smog tests on vehicles 1
5 through 9, identified in Table 1 above, in accordance with the Bureau's specifications.

6 **EIGHTH CAUSE FOR DISCIPLINE**

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

8 32. Respondent Zeit's technician license is subject to disciplinary action pursuant to
9 Health & Saf. Code section 44072.2, subdivision (d), in that Respondent committed dishonest,
10 fraudulent, or deceitful acts whereby another is injured by issuing electronic smog certificates of
11 compliance for vehicles 1 through 9, identified in Table 1 above, without performing bona fide
12 inspections of the emission control devices and systems on the vehicles, thereby depriving the
13 People of the State of California of the protection afforded by the Motor Vehicle Inspection
14 Program.

15 **OTHER MATTERS**

16 33. Pursuant to Bus. & Prof. Code section 9884.7, subdivision (c), the Director may
17 suspend, revoke or place on probation the registration for all places of business operated in this
18 state by Respondent Yousef K. Zeit, owner of Joe's Smog Test Only, upon a finding that
19 Respondent has, or is, engaged in a course of repeated and willful violations of the laws and
20 regulations pertaining to an automotive repair dealer.

21 34. Pursuant to Health & Saf. Code section 44072.8, if Smog Check, Test Only, Station
22 License Number TC 266397, issued to Respondent Yousef K. Zeit, owner of Joe's Smog Test
23 Only, is revoked or suspended, any additional license issued under the same chapter in the name
24 of said licensee may be likewise revoked or suspended by the Director.

25 35. Pursuant to Health & Saf. Code section 44072.8, if Advanced Emission Specialist
26 Technician License Number FA 632736, upon renewal and redesignation as EO 632736 and/or
27 EI 632736, issued to Yousef K. Zeit, is revoked or suspended, any additional license issued under
28 this chapter in the name of said licensee may be likewise revoked or suspended by the director.

PRAYER

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

1. Revoking or suspending Automotive Repair Dealer Registration Number ARD 266397, issued to Yousef K. Zeit, owner of Joe's Smog Test Only;
2. Revoking or suspending any other automotive repair dealer registration issued to Yousef K. Zeit;
3. Revoking or suspending Smog Check, Test Only, Station License Number TC 266397, issued to Yousef K. Zeit, owner of Joe's Smog Test Only;
4. Revoking or suspending Advanced Emission Specialist Technician License Number EA 632736, as redesignated Smog Check Inspector License Number EO 632736 and/or Smog Check repair Technician License Number EI 632736, issued to Yousef K. Zeit;
5. Revoking or suspending any additional license issued under Chapter 5 of the Health and Safety Code in the name of Yousef K. Zeit;
6. Ordering Yousef K. Zeit to pay the Bureau of Automotive Repair the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;
7. Taking such other and further action as deemed necessary and proper.

DATED: 9-30-13

Pat Dorais by [Signature]
PATRICK DORAIS
Acting Chief
Bureau of Automotive Repair
Department of Consumer Affairs
State of California
Wanda Balath
Complainant

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