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

11 In the Matter of the Accusation Against:

12 **SMOG TECH**
13 **430 N. Airport Way, Suite A**
Stockton, CA 95205
14 **HARJIT SINGH, PARTNER**
JASJIT KAUR BAIN, PARTNER
15 **Automotive Repair Dealer Registration No.**
ARD 243698
16 **Smog Check Test Only Station License No.**
TC 243698,

17 and

18 **HARJIT SINGH**
19 **2250 Olson Drive**
Lodi, CA 95242
20 **Advanced Emission Specialist Technician**
License No. EA 137249

21 and

22 **PAUL SUPOTE VIRIYAPUNT**
23 **9018 Warm Springs Circle**
Stockton, CA 95210
24 **Advanced Emission Specialist Technician**
License No. EA 630183

25 Respondents.
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28 Complainant alleges:

Case No. 79/11-99

A C C U S A T I O N

S M O G C H E C K

1 PARTIES

2 1. Sherry Mehl ("Complainant") brings this Accusation solely in her official capacity as
3 the Chief of the Bureau of Automotive Repair ("Bureau"), Department of Consumer Affairs.

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5 **Automotive Repair Dealer Registration**

6 2. On a date uncertain in 2006, the Bureau issued Automotive Repair Dealer
7 Registration Number ARD 243698 ("registration") to Smog Tech ("Respondent Smog Tech")
8 with Harjit Singh and Jasjit Kaur Bains as partners. The registration was in full force and effect
9 at all times relevant to the charges brought herein and will expire on February 28, 2011, unless
10 renewed.

11 **Smog Check Test Only Station License**

12 3. On or about March 17, 2006, the Bureau issued Smog Check Test Only Station
13 License Number TC 243698 ("station license") to Respondent Smog Tech. The station license
14 was in full force and effect at all times relevant to the charges brought herein and will expire on
15 February 28, 2011, unless renewed.

16 **Advanced Emission Specialist Technician License**

17 4. On a date uncertain in 2002, the Bureau issued Advanced Emission Specialist
18 Technician License Number EA 137249 ("technician license") to Harjit Singh ("Respondent
19 Singh"). The technician license was in full force and effect at all times relevant to the charges
20 brought herein and will expire on March 31, 2012, unless renewed.

21 **Advanced Emission Specialist Technician License**

22 5. On or about May 5, 2008, the Bureau issued Advanced Emission Specialist
23 Technician License Number EA 630183 ("technician license") to Paul Supote Viriyapunt
24 ("Respondent Viriyapunt"). The technician license was in full force and effect at all times
25 relevant to the charges brought herein and will expire on September 30, 2012, unless renewed.

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1 10. Section 44072.2 of the Health and Safety Code states, in pertinent part:

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

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

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

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

12 11. Section 44072.6 of the Health and Safety Code provides, in pertinent part, that the
13 expiration or suspension of a license by operation of law, or by order or decision of the Director
14 of Consumer Affairs, or a court of law, or the voluntary surrender of the license shall not deprive
15 the Director of jurisdiction to proceed with disciplinary action.

16 12. Section 44072.8 of the Health and Safety Code states:

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

20 COST RECOVERY

21 13. Code section 125.3 provides, in pertinent part, that a Board may request the
22 administrative law judge to direct a licentiate found to have committed a violation or violations of
23 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
24 enforcement of the case.

25 SURVEILLANCE OPERATION – APRIL 30, 2010

26 14. On or about April 30, 2010, the Bureau performed a surveillance operation at
27 Respondent Smog Tech's facility. The surveillance operation and information obtained from the
28 Bureau's Vehicle Information Database ("VID") revealed that between 1446 hours and 1509
hours, Respondent Singh performed an aborted smog test on a 1995 Buick Skylark. Between
1518 hours and 1531 hours Respondents Viriyapunt and Singh performed a second smog
inspection that resulted in the issuance of electronic Certificate of Compliance No. NS840665C

1 for a 1995 Buick Skylark by Respondent Singh. Respondent Singh certified that he had tested
2 and inspected the vehicle and that the vehicle was in compliance with applicable laws and
3 regulations. In fact, Respondent Singh performed the smog inspection using the clean piping¹
4 method by using the tail pipe emissions of a 1999 Buick in order to issue the electronic certificate
5 of compliance to the 1995 Buick Skylark.

6 **FIRST CAUSE FOR DISCIPLINE**

7 **(Misleading Statements)**

8 15. Respondent Smog Tech has subjected its registration to discipline under Code section
9 9884.7, subdivision (a)(1), in that on or about April 30, 2010, it made statements which it knew or
10 which by exercise of reasonable care it should have known were untrue or misleading when it
11 issued electronic Certificate of Compliance No. NS840665C for the 1995 Buick Skylark,
12 certifying that the vehicle was in compliance with applicable laws and regulations when, in fact,
13 the vehicle had been clean piped.

14 **SECOND CAUSE FOR DISCIPLINE**

15 **(Fraud)**

16 16. Respondent Smog Tech has subjected its registration to discipline under Code section
17 9884.7, subdivision (a)(4), in that on or about April 30, 2010, it committed acts which constitute
18 fraud by issuing electronic Certificate of Compliance No. NS840665C for the 1995 Buick
19 Skylark, without performing a bona fide inspection of the emission control devices and systems
20 on that vehicle, thereby depriving the People of the State of California of the protection afforded
21 by the Motor Vehicle Inspection Program.

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26 ¹ "Clean piping" is sampling the (clean) tailpipe emissions and/or the RPM readings of
27 another vehicle for the purpose of illegally issuing smog certifications to vehicles that are not in
28 compliance or are not present in the smog check area during the time of the certification.

1 THIRD CAUSE FOR DISCIPLINE

2 (Violation of the Motor Vehicle Inspection Program)

3 17. Respondent Smog Tech has subjected its station license to discipline under Health
4 and Safety Code section 44072.2, subdivision (a), in that on or about April 30, 2010, regarding
5 the 1995 Buick Skylark, it violated sections of that Code, as follows:

6 a. **Section 44012, subdivision (a):** Respondent Smog Tech failed to determine that all
7 emission control devices and systems required by law were installed and functioning correctly in
8 accordance with test procedures.

9 b. **Section 44012, subdivision (f):** Respondent Smog Tech failed to perform emission
10 control tests on that vehicle in accordance with procedures prescribed by the department.

11 c. **Section 44015, subdivision (b):** Respondent Smog Tech issued electronic Certificate
12 of Compliance No. NS840665C without properly testing and inspecting that vehicle to determine
13 if it was in compliance with section 44012 of that Code.

14 d. **Section 44059:** Respondent Smog Tech willfully made false entries for electronic
15 Certificate of Compliance No. NS840665C by certifying that the vehicle had been inspected as
16 required when, in fact, it had not.

17 FOURTH CAUSE FOR DISCIPLINE

18 (Violations of Regulations Pursuant to the Motor Vehicle Inspection Program)

19 18. Respondent Smog Tech has subjected its station license to discipline under Health
20 and Safety Code section 44072.2, subdivision (c), in that on or about April 30, 2010, regarding
21 the 1995 Buick Skylark, it violated sections of the California Code of Regulations, title 16, as
22 follows:

23 a. **Section 3340.24, subdivision (c):** Respondent Smog Tech falsely or fraudulently
24 issued electronic Certificate of Compliance No. NS840665C without performing a bona fide
25 inspection of the emission control devices and systems on that vehicle as required by Health and
26 Safety Code section 44012.

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1 depriving the People of the State of California of the protection afforded by the Motor Vehicle
2 Inspection Program.

3 **NINTH CAUSE FOR DISCIPLINE**

4 **(Violations of the Motor Vehicle Inspection Program)**

5 23. Respondent Viriyapunt has subjected his technician license to discipline under Health
6 and Safety Code section 44072.2, subdivision (a), in that on or about April 30, 2010, regarding
7 the 1995 Buick Skylark, he violated sections of that Code, as follows:

8 a. **Section 44012, subdivision (a):** Respondent Viriyapunt failed to determine that all
9 emission control devices and systems required by law were installed and functioning correctly in
10 accordance with test procedures.

11 b. **Section 44012, subdivision (f):** Respondent Viriyapunt failed to perform emission
12 control tests on that vehicle in accordance with procedures prescribed by the department.

13 c. **Section 44032:** Respondent Viriyapunt failed to perform tests of the emission control
14 devices and systems on that vehicle in accordance with section 44012 of that Code, in that the
15 vehicle had been clean piped.

16 **TENTH CAUSE FOR DISCIPLINE**

17 **(Violations of Regulations Pursuant to the Motor Vehicle Inspection Program)**

18 24. Respondent Viriyapunt has subjected his technician license to discipline under Health
19 and Safety Code section 44072.2, subdivision (c), in that on or about April 30, 2010, regarding
20 the 1995 Buick Skylark, he violated sections of the California Code of Regulations, title 16, as
21 follows:

22 a. **Section 3340.30, subdivision (a):** Respondent Viriyapunt failed to inspect and test
23 that vehicle in accordance with Health and Safety Code section 44012.

24 b. **Section 3340.42:** Respondent Viriyapunt failed to conduct the required smog tests
25 and inspections on that vehicle in accordance with the Bureau's specifications.

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1 **SURVEILLANCE OPERATION – MAY 21, 2010**

2 25. On or about May 21, 2010, the Bureau conducted a video-taped surveillance of
3 Respondent Smog Tech's facility.

4 26. On or about May 24, 2010, the Bureau conducted a detailed review of the VID for all
5 smog inspections performed at Respondent Smog Tech's facility for May 21, 2010, and compared
6 it to the video images from the surveillance operation of May 21, 2010. The video showed that
7 between 1031 hours and 1052 hours, Respondent Viriyapunt with the aid of an unlicensed person
8 (later identified as John Ya) performed the smog inspection of a 2006 Chevrolet Tahoe, License
9 No. 5SJC337. Ya made entries into the EIS and Respondent Viriyapunt issued electronic
10 Certificate of Compliance No. NU120280C for the 2006 Chevrolet Tahoe.

11 27. On the same date, between 1758 hours and 1804 hours, Respondent Viriyapunt began
12 a smog inspection on a 2003 Lincoln Aviator, License No. 5UBM985. Respondent Viriyapunt
13 removed the interface cable, which he previously attached, from the Lincoln Aviator's computer
14 and tossed the cable to the area of the station's adjoining smog test bay. Respondent Viriyapunt
15 then returned to the EIS and made entries to begin the OBDII functional test², even though the
16 interface cable was not plugged into the Lincoln Aviator's computer. At 1804 hours, Respondent
17 Viriyapunt issued electronic Certificate of Compliance No. NU120287C for the 2003 Lincoln
18 Aviator using the clean plugging method³. The Lincoln Aviator was not tested during the OBDII
19 functional test.

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22 ² The OBDII functional test is an automated function of the BAR-97 analyzer. During the
23 OBDII test, the technician is required to connect an interface cable from the BAR-97 analyzer to
24 a Diagnostic Link Connector (DLC) which is located inside the vehicle. Through the DLC, the
25 BAR-97 analyzer automatically 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 OBDII functional test, it will fail the overall inspection.

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

1 **ELEVENTH CAUSE FOR DISCIPLINE**

2 **(Misleading Statements)**

3 28. Respondent Smog Tech has subjected its registration to discipline under Code section
4 9884.7, subdivision (a)(1), in that on or about May 21, 2010, it made statements which it knew or
5 which by exercise of reasonable care it should have known were untrue or misleading as follows:

6 a. Respondent Smog Tech certified that that 2006 Chevrolet Tahoe had been tested and
7 inspected by a licensed technician when, in fact, Ya, an unlicensed person performed most
8 aspects of the smog inspection.

9 b. Respondent Smog Tech certified that the 2003 Lincoln Aviator had passed inspection
10 and was in compliance with applicable laws and regulations. In fact, Respondent Smog Tech
11 conducted the inspection on that vehicle using clean plugging methods in order to issue electronic
12 Certificate of Compliance No. NU120287C for that vehicle, and did not test or inspect the 2003
13 Lincoln Aviator as required by Health and Safety Code section 44012.

14 **TWELFTH CAUSE FOR DISCIPLINE**

15 **(Fraud)**

16 29. Respondent Smog Tech has subjected its registration to discipline under Code section
17 9884.7, subdivision (a)(4), in that on or about May 21, 2010, it committed acts which constitute
18 fraud by issuing electronic Certificate of Compliance No. NU120287C for the 2003 Lincoln
19 Aviator without performing a bona fide inspection of the emission control devices and systems on
20 that vehicle, thereby depriving the People of the State of California of the protection afforded by
21 the Motor Vehicle Inspection Program.

22 **THIRTEENTH CAUSE FOR DISCIPLINE**

23 **(Violation of the Motor Vehicle Inspection Program)**

24 30. Respondent Smog Tech has subjected its station license to discipline under Health
25 and Safety Code section 44072.2, subdivision (a), in that on or about May 21, 2010, regarding the
26 2006 Chevrolet Tahoe and 2003 Lincoln Aviator, it violated sections of that Code, as follows:

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1 a. **Section 44012:** Respondent Smog Tech failed to ensure that the emission control
2 tests were performed on the 2003 Lincoln Aviator in accordance with procedures prescribed by
3 the department.

4 b. **Section 44014:** Respondent Smog Tech allowed John Ya, an unlicensed person, to
5 participate in the smog tests and inspections on the 2006 Chevrolet Tahoe.

6 c. **Section 44015:** Respondent Smog Tech issued electronic Certificate of Compliance
7 No. NU120287C for the 2003 Lincoln Aviator without ensuring that the vehicle was properly
8 tested and inspected to determine if it was in compliance with Health and Safety Code section
9 44012.

10 d. **Section 44059:** Respondent Smog Tech willfully made false entries for electronic
11 Certificate of Compliance No. NU120287C by certifying that the 2003 Lincoln Aviator had been
12 inspected as required when, in fact, it had not.

13 **FOURTEENTH CAUSE FOR DISCIPLINE**

14 **(Violations of Regulations Pursuant to the Motor Vehicle Inspection Program)**

15 31. Respondent Smog Tech has subjected its station license to discipline under Health
16 and Safety Code section 44072.2, subdivision (c), in that on or about May 21, 2010, regarding the
17 2003 Lincoln Aviator, it violated sections of the California Code of Regulations, title 16, as
18 follows:

19 a. **Section 3340.24, subdivision (c):** Respondent Smog Tech falsely or fraudulently
20 issued electronic Certificate of Compliance No. NU120287C for that vehicle without performing
21 a bona fide inspection of the emission control devices and systems on the vehicle as required by
22 Health and Safety Code section 44012.

23 b. **Section 3340.35, subdivision (c):** Respondent Smog Tech issued electronic
24 Certificate of Compliance No. NU120287C even though the vehicle had not been inspected in
25 accordance with section 3340.42 of that Code.

26 c. **Section 3340.42:** Respondent Smog Tech failed to conduct the required smog tests
27 and inspections on that vehicle in accordance with the Bureau's specifications.
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1 FIFTEENTH CAUSE FOR DISCIPLINE

2 (Dishonesty, Fraud or Deceit)

3 32. Respondent Smog Tech has subjected its station license to discipline under Health
4 and Safety Code section 44072.2, subdivision (d), in that on or about May 21, 2010, regarding the
5 2003 Lincoln Aviator, it committed acts involving dishonesty, fraud or deceit whereby another
6 was injured by issuing electronic Certificate of Compliance No. NU120287C for that vehicle
7 without performing a bona fide inspection of the emission control devices and system on the
8 vehicle, thereby depriving the People of the State of California of the protection afforded by the
9 Motor Vehicle Inspection Program.

10 SIXTEENTH CAUSE FOR DISCIPLINE

11 (Aiding and Abetting an Unlicensed Person)

12 33. Respondent Smog Tech has subjected its station license to discipline under Health
13 and Safety Code section 44072.2, subdivision (f), in that on or about May 21, 2010, regarding the
14 2006 Chevrolet Tahoe, it aided and abetted John Ya, an unlicensed person, by allowing Ya to
15 participate in the smog tests and inspections performed on that vehicle.

16 SEVENTEENTH CAUSE FOR DISCIPLINE

17 (Violation of the Motor Vehicle Inspection Program)

18 34. Respondent Viriyapunt has subjected his technician license to discipline under Health
19 and Safety Code section 44072.2, subdivision (a), in that on or about May 21, 2010, regarding the
20 2006 Chevrolet Tahoe and 2003 Lincoln Aviator, he violated sections of that Code, as follows:

21 a. **Section 44012:** Respondent Viriyapunt failed to ensure that the emission control tests
22 were performed on the 2003 Lincoln Aviator in accordance with procedures prescribed by the
23 department.

24 b. **Section 44014:** Respondent Viriyapunt allowed John Ya, an unlicensed person, to
25 participate in the smog tests and inspections on the 2006 Chevrolet Tahoe.

26 c. **Section 44015:** Respondent Viriyapunt issued electronic Certificate of Compliance
27 No. NU120287C for the 2003 Lincoln Aviator without ensuring that the vehicle was properly
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1 tested and inspected to determine if it was in compliance with Health and Safety Code section
2 44012.

3 d. **Section 44059:** Respondent Viriyapunt willfully made false entries for electronic
4 Certificate of Compliance No. NU120287C by certifying that the 2003 Lincoln Aviator had been
5 inspected as required when, in fact, it had not.

6 **EIGHTEENTH CAUSE FOR DISCIPLINE**

7 **(Violations of Regulations Pursuant to the Motor Vehicle Inspection Program)**

8 35. Respondent Viriyapunt has subjected his technician license to discipline under Health
9 and Safety Code section 44072.2, subdivision (c), in that on or about May 21, 2010, regarding the
10 2003 Lincoln Aviator, he violated sections of the California Code of Regulations, title 16, as
11 follows:

12 a. **Section 3340.24, subdivision (c):** Respondent Viriyapunt falsely or fraudulently
13 issued electronic Certificate of Compliance No. NU120287C without performing a bona fide
14 inspection of the emission control devices and systems on that vehicle as required by Health and
15 Safety Code section 44012.

16 b. **Section 3340.30, subdivision (a):** Respondent Viriyapunt failed to inspect and test
17 that vehicle in accordance with Health and Safety Code section 44012.

18 c. **Section 3340.42:** Respondent Viriyapunt failed to conduct the required smog tests
19 and inspections on that vehicle in accordance with the Bureau's specifications.

20 **NINETEENTH CAUSE FOR DISCIPLINE**

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

22 36. Respondent Viriyapunt has subjected his technician license to discipline under Health
23 and Safety Code section 44072.2, subdivision (d), in that on or about May 21, 2010, regarding the
24 2003 Lincoln Aviator, he committed acts involving dishonesty, fraud or deceit whereby another
25 was injured by issuing electronic Certificate of Compliance No. NU120287C without performing
26 a bona fide inspection of the emission control devices and systems on that vehicle, thereby
27 depriving the People of the State of California of the protection afforded by the Motor Vehicle
28 Inspection Program.

1 **TWENTIETH CAUSE FOR DISCIPLINE**

2 **(Aiding and Abetting an Unlicensed Person)**

3 37. Respondent Viriyapunt subjected his technician license to discipline under Health and
4 Safety Code section 44072.2, subdivision (f), in that on or about May 21, 2010, regarding the
5 2006 Chevrolet Tahoe, he aided and abetted John Ya, an unlicensed person, by allowing him to
6 participate in the smog tests and inspections performed on that vehicle.

7 **PRIOR CITATIONS**

8 38. To determine the degree of penalty, if any, to be imposed upon Respondents Smog
9 Tech and Viriyapunt, Complainant alleges as follows:

10 a. On December 27, 2006, the Bureau issued Citation No. C07-0426 to Respondent
11 Smog Tech against its registration and station licenses for violations of Health and Safety Code
12 section 44012, subdivision (f) (failure to perform a visual/functional check of emission control
13 devices) and California Code of Regulations, title 16, ("Regulation"), section 3340.35,
14 subdivision (c) (issuing a certificate of compliance to a vehicle improperly tested). Respondent
15 Smog Tech issued a certificate of compliance to a Bureau vehicle with a non-functional exhaust
16 gas recirculation system. The Bureau assessed a civil penalty of \$500. Respondent Smog Tech
17 complied with this citation on February 22, 2007.

18 b. On May 13, 2009, the Bureau issued Citation No. C09-1299 to Respondent Smog
19 Tech against its registration and station licenses for violations of Health and Safety Code section
20 44012, subdivision (f) (failure to perform a visual/functional check of emission control devices)
21 and Regulation, section 3340.35, subdivision (c) (issuing a certificate of compliance to a vehicle
22 improperly tested). Respondent Smog Tech issued a certificate of compliance to a Bureau vehicle
23 with the ignition timing adjusted beyond the manufacturer's specifications. The Bureau assessed
24 a civil penalty of \$500. Respondent Smog Tech complied with this citation on June 30, 2009.

25 **OTHER MATTERS**

26 39. Under Code section 9884.7, subdivision (c), the director may invalidate temporarily
27 or permanently or refuse to validate, the registrations for all places of business operated in this
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1 state by to Smog Tech, upon a finding that it has, or is, engaged in a course of repeated and
2 willful violations of the laws and regulations pertaining to an automotive repair dealer.

3 40. Under Health and Safety Code section 44072.8, if Smog Check Test Only Station
4 License Number TC 243698, issued to Smog Tech, is revoked or suspended, any additional
5 license issued under this chapter in the name of said licensee may be likewise revoked or
6 suspended by the director.

7 41. Under Health and Safety Code section 44072.8, if Advanced Emission Specialist
8 Technician License Number EA 630183, issued to Paul Supote Viriyapunt, is revoked or
9 suspended, any additional license issued under this chapter in the name of said licensee may be
10 likewise revoked or suspended by the director.

11 42. Under Health and Safety Code section 44072.8, if Advanced Emission Specialist
12 Technician License Number EA 137249, issued to Harjit Singh, is revoked or suspended, any
13 additional license issued under this chapter in the name of said licensee may be likewise revoked
14 or suspended by the director.

15 **PRAYER**

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

18 1. Revoking, suspending or placing on probation Automotive Repair Dealer Registration
19 Number ARD 243698, issued to Smog Tech;

20 2. Revoking, suspending or placing on probation any other automotive repair dealer
21 registration issued in the name of Smog Tech;

22 3. Revoking or suspending Smog Check Test Only Station License Number TC 243698,
23 issued to Smog Tech;

24 4. Revoking or suspending any additional license issued under Chapter 5 of the Health
25 & Safety Code in the name of Smog Tech;

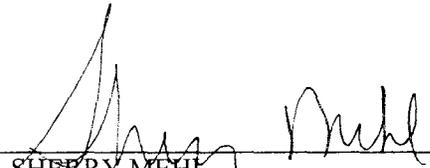
26 5. Revoking or suspending Advanced Emission Specialist Technician License Number
27 EA 630183, issued to Paul Supote Viriyapunt;

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- 6. Revoking or suspending any additional license issued under Chapter 5 of the Health & Safety Code in the name of Paul Supote Viriyapunt;
- 7. Revoking or suspending Advanced Emission Specialist Technician License Number EA 137249, issued to Harjit Singh;
- 8. Revoking or suspending any additional license issued under Chapter 5 of the Health & Safety Code in the name of Harjit Singh;
- 9. Ordering Smog Tech, Harjit Singh, and Paul Supote Viriyapunt 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; and,
- 10. Taking such other and further action as deemed necessary and proper.

DATED: 6/15/11



SHERRY MEHL
Chief
Bureau of Automotive Repair
Department of Consumer Affairs
State of California
Complainant

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