

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

In the Matter of the Accusation and Petition to Revoke
Probation Against:

GEORGE SEROUR NAKHLA

1949 Phillips Way
Los Angeles, CA 90042

**Advanced Emission Specialist Technician
License No. EA 133386**

Case No. 79/12-60

OAH No. 2012021121

Respondent.

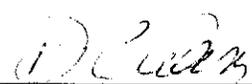
DECISION

The attached Stipulated Revocation of License and Order 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

2/22/13

DATED: February 5, 2013



DONALD CHANG
Assistant Chief Counsel
Department of Consumer Affairs

1 KAMALA D. HARRIS
Attorney General of California
2 GREGORY J. SALUTE
Supervising Deputy Attorney General
3 HEATHER HUA
Deputy Attorney General
4 State Bar No. 223418
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
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Attorneys for Complainant

7
8 **BEFORE THE**
DEPARTMENT OF CONSUMER AFFAIRS
FOR THE BUREAU OF AUTOMOTIVE REPAIR
9 **STATE OF CALIFORNIA**
10

11 In the Matter of the Accusation and Petition to
12 Revoke Probation Against:

13 **GEORGE SEROUR NAKHLA**
14 **1949 Phillips Way**
Los Angeles, CA 90042

15 **Advanced Emission Specialist Technician**
16 **License No. EA 133386**

17 Respondent.
18

Case No. 79/12-60

OAH No. 2012021121

STIPULATED REVOCATION OF
LICENSE AND ORDER

19 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this
20 proceeding that the following matters are true:

21 **PARTIES**

22 1. John Wallauch (Complainant) is the Chief of the Bureau of Automotive Repair. He
23 brought this action solely in his official capacity and is represented in this matter by Kamala D.
24 Harris, Attorney General of the State of California, by Heather Hua, Deputy Attorney General.

25 2. George Serour Nakhla (Respondent) is represented in this proceeding by attorney
26 Michael B. Levin, Esq., whose address is 3727 Camino del Rio South, Suite 200
27 San Diego, CA 92108.
28

1 It supersedes any and all prior or contemporaneous agreements, understandings, discussions,
2 negotiations, and commitments (written or oral). This Stipulated Revocation of License and
3 Order may not be altered, amended, modified, supplemented, or otherwise changed except by a
4 writing executed by an authorized representative of each of the parties.

5 14. In consideration of the foregoing admissions and stipulations, the parties agree that
6 the Director may, without further notice or formal proceeding, issue and enter the following
7 Order:

8 **ORDER**

9 IT IS HEREBY ORDERED that Advanced Emission Specialist Technician License No. EA
10 133386, issued to Respondent George Serour Nakhla, is revoked and accepted by the Director of
11 Consumer Affairs.

12 1. The revocation of Respondent's Advanced Emission Specialist Technician License
13 and the acceptance of the revoked license by the Bureau shall constitute the imposition of
14 discipline against Respondent. This stipulation constitutes a record of the discipline and shall
15 become a part of Respondent's license history with the Bureau of Automotive Repair.

16 2. Respondent shall lose all rights and privileges as an Advanced Emission Specialist
17 Technician in California as of the effective date of the Director's Decision and Order.

18 3. Respondent shall cause to be delivered to the Bureau his pocket license and, if one
19 was issued, his wall certificate on or before the effective date of the Decision and Order.

20 4. If Respondent ever files an application for licensure or a petition for reinstatement in
21 the State of California, the Bureau shall treat it as a petition for reinstatement. Respondent must
22 comply with all the laws, regulations and procedures for reinstatement of a revoked license in
23 effect at the time the petition is filed, and all of the charges and allegations contained in
24 Accusation and Petition to Revoke Probation Case No. 79/12-60 shall be deemed to be true,
25 correct and admitted by Respondent when the Director determines whether to grant or deny the
26 petition.

27

28

ENDORSEMENT

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

Dated: *January 14, 2013*

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
GREGORY J. SALUTE
Supervising Deputy Attorney General



HEATHER HUA
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation and Petition to Revoke Probation Case No. 79/12-60

1 KAMALA D. HARRIS
Attorney General of California
2 ALFREDO TERRAZAS
Senior Assistant Attorney General
3 GREGORY J. SALUTE
Supervising Deputy Attorney General
4 State Bar No. 164015
300 So. Spring Street, Suite 1702
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Attorneys for Complainant
7

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

10

11 In the Matter of the Accusation and Petition to
12 Revoke Probation Against:

Case No. 79/12-60

13 **GEORGE SEROUR NAKHLA**
1949 Phillips Way
14 Los Angeles, CA 90042
Advanced Emission Specialist Technician
License No. EA 133386

**ACCUSATION AND PETITION TO
REVOKE PROBATION**

15

Smog Check

16

Respondent.

17

Complainant alleges:

18

PARTIES

19

1. Sherry Mehl ("Complainant") brings this Accusation and Petition to Revoke
20 Probation solely in her official capacity as the Chief of the Bureau of Automotive Repair
21 ("Bureau"), Department of Consumer Affairs.

22

Advanced Emission Specialist Technician License

23

2. On a date uncertain in 1998, the Bureau issued Advanced Emission Specialist
24 Technician License Number EA 133386 ("technician license") to George Serour Nakhla
25 ("Respondent"). The technician license was in full force and effect at all times relevant to the
26 charges brought herein and will expire on September 30, 2012, unless renewed.

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1 15. Grounds exist to revoke the probation and reimpose the order of revocation of
2 Respondent's Advanced Emission Specialist Technician License Number EA 133386, in that
3 Respondent failed to comply with all statutes, regulations, and rules governing estimates and
4 inspections as required by Term 1 of the terms of the probation under Decision and Stipulated
5 Settlement and Disciplinary Order No. 79/10-85, as set forth in paragraphs 10 through 13 of the
6 accusation above.

7 **OTHER MATTERS**

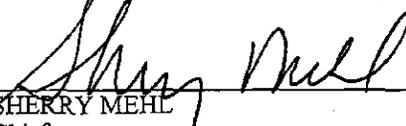
8 16. Under section 44072.8 of the Health and Safety Code, if Advanced Emission
9 Specialist Technician License Number EA 133386, is revoked or suspended, any additional
10 license issued under this chapter in the name of said licensee may be likewise revoked or
11 suspended by the director.

12 **PRAYER**

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

- 15 1. Vacating the stay and reimposing the order of revocation of Advanced Emission
16 Specialist Technician License Number EA 133386, issued to George Serour Nakhla;
17 2. Revoking or suspending any other license issued under this chapter in the name of
18 George Serour Nakhla;
19 3. Ordering George Serour Nakhla to pay the Bureau of Automotive Repair the
20 reasonable costs of the investigation and enforcement of this case, pursuant to Business and
21 Professions Code section 125.3; and,
22 4. Taking such other and further action as deemed necessary and proper.

23 DATED: 12/8/11


24 SHERRY MEHL
25 Chief
26 Bureau of Automotive Repair
27 Department of Consumer Affairs
28 State of California
Complainant

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

In the Matter of the Accusation Against:

GEORGE SEROUR NAKHLA
dba SOTO SMOG INCORP., ET AL.
918 N. Soto Street
Los Angeles, CA 90033

Automotive Repair Dealer Registration
No. ARD 223617
Smog Check Station License No. TC 223617
Smog Technician License No. EA 133386

Respondents.

Case No. 79/10-85

DECISION

The attached Stipulated Settlement and Disciplinary Order 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 on 10-11-10.

DATED: September 7, 2010



DORÉATHEA JOHNSON
Deputy Director, Legal Affairs
Department of Consumer Affairs

1 EDMUND G. BROWN JR.
Attorney General of California
2 KAREN B. CHAPPELLE
Supervising Deputy Attorney General
3 GREGORY J. SALUTE
Supervising Deputy Attorney General
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Attorneys for Complainant

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

10
11 In the Matter of the Accusation Against:

Case No. 79/10-85

12 **GEORGE SEROUR NAKHLA DBA SOTO**
SMOG INCORP., ET. AL
13 **918 N. Soto Street**
Los Angeles, CA 90033
14 **Automotive Repair Dealer License No. ARD**
223617
15 **Smog Check Station No. TC 223617**
Smog Technician License No. EA 133386

STIPULATED SETTLEMENT AND
DISCIPLINARY ORDER

16
17 Respondents.

18
19 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-
20 entitled proceedings that the following matters are true:

21 PARTIES

22 1. Sherry Mehl (Complainant) is the Chief of the Bureau of Automotive Repair. She
23 brought this action solely in her official capacity and is represented in this matter by Edmund G.
24 Brown Jr., Attorney General of the State of California, by Gregory J. Salute, Supervising Deputy
25 Attorney General.

26 2. Respondent George Serour Nakhla dba Soto Smog Incorp., et.al (Respondent) is
27 representing himself in this proceeding and has chosen not to exercise his right to be represented
28 by counsel.

1 present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel
2 the attendance of witnesses and the production of documents; the right to reconsideration and
3 court review of an adverse decision; and all other rights accorded by the California
4 Administrative Procedure Act and other applicable laws.

5 9. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
6 every right set forth above.

7 CULPABILITY

8 10. Respondent admits the truth of each and every charge and allegation in Accusation
9 No. 79/10-85.

10 11. Respondent agrees that Automotive Repair Dealer License No. ARD 223617,
11 Smog Check Station No. TC 223617, and Smog Technician License No. EA 133386, are all
12 subject to discipline and he agrees to be bound by the Director of Consumer Affairs (Director)'s
13 imposition of discipline as set forth in the Disciplinary Order below.

14 CIRCUMSTANCES IN MITIGATION

15 12. Respondent George Serour Nakhla dba Soto Smog Incorp., et. al is admitting
16 responsibility at an early stage in the proceedings.

17 CONTINGENCY

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

28

1 Professions Code.

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

4 5. **Jurisdiction.** If an accusation is filed against Respondent during the term of
5 probation, the Director of Consumer Affairs shall have continuing jurisdiction over this matter
6 until the final decision on the accusation, and the period of probation shall be extended until such
7 decision.

8 6. **Violation of Probation.** Should the Director of Consumer Affairs determine that
9 Respondent has failed to comply with the terms and conditions of probation, the Department may,
10 after giving notice and opportunity to be heard suspend or revoke the license.

11 7. **Continuing Education Courses.** During the period of probation, Respondent shall
12 attend and successfully complete a Bureau certified training course in diagnosis and repair of
13 emission systems failures and engine performance, applicable to the class of license held by the
14 Respondent. Said course shall be completed and proof of completion submitted to the Bureau
15 within 60 days of the effective date of this decision and order. If proof of completion of the
16 course is not furnished to the Bureau within the 60-day period, Respondents' license shall be
17 immediately suspended until such proof is received.

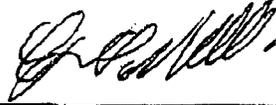
18 8. **Cost Recovery.** Payment to the Bureau of the full amount of cost recovery in the
19 amount of \$4660.00 shall be received no later than 6 months before probation terminates. Failure
20 to complete payment of cost recovery within this time frame shall constitute a violation of
21 probation which may subject Respondent's license to outright revocation; however, the Director
22 or the Director's Bureau of Automotive Repair designee may elect to continue probation until
23 such time as reimbursement of the entire cost recovery amount has been made to the Bureau.

24 ACCEPTANCE

25 I have carefully read the Stipulated Settlement and Disciplinary Order. I understand the
26 stipulation and the effect it will have on my Automotive Repair Dealer License, and Smog Check
27 Station, and Smog Technician License. I enter into this Stipulated Settlement and Disciplinary
28

1 Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order
2 of the Director of Consumer Affairs.

3 DATED: 08-18-10



4 GEORGE SEROUR NAKHLA DBA SOTO SMOG
5 INCORP., ET. AL
6 Respondent

7 ENDORSEMENT

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

10 Dated: 8-20-10

Respectfully Submitted,

11 EDMUND G. BROWN JR.
12 Attorney General of California
13 KAREN B. CHAPPELLE
14 Supervising Deputy Attorney General



15 GREGORY J. SALUTE
16 Supervising Deputy Attorney General
17 Attorneys for Complainant

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Exhibit A

Accusation No. 79/10-85

1 EDMUND G. BROWN JR.
Attorney General of California
2 ALFREDO TERRAZAS
Senior Assistant Attorney General
3 GREGORY J. SALUTE
Supervising Deputy Attorney General
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Attorneys for Complainant
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8 **BEFORE THE**
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **FOR THE BUREAU OF AUTOMOTIVE REPAIR**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No.

79/10-85

13 **SOTO SMOG INCORPORATED**
14 **GEORGE SEROUR NAKHLA, President**
918 N. Soto Street
15 Los Angeles, CA 90033
Automotive Repair Dealer License No. ARD 223617
16 **Smog Check Station No. TC 223617**

A C C U S A T I O N

SMOG CHECK

17 Respondent.

18
19 Sherry Mehl ("Complainant") alleges:

20 **PARTIES**

21 1. Complainant brings this Accusation solely in her official capacity as the Chief of the
22 Bureau of Automotive Repair I/M Smog ("Bureau"), Department of Consumer Affairs.

23 **Automotive Repair Dealer Registration No. ARD 223617**

24 2. On or about October 24, 2002, the Bureau issued Automotive Repair Dealer
25 Registration No. ARD 223617 ("registration") to Soto Smog Incorporated ("Respondent") with
26 George Serour Nakhla as the President. The registration will expire on or about
27 September 30, 2010, unless renewed.

28 ///

1 against an automotive repair dealer or to render a decision invalidating a registration temporarily
2 or permanently.

3 6. Section 44002 of the Health and Safety Code provides, in pertinent part, that the
4 Director has all the powers and authority granted under the Automotive Repair Act for enforcing
5 the Motor Vehicle Inspection Program.

6 7. Section 44072.2 of the Health and Safety Code states, in pertinent part:

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

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

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

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

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

20 9. Section 44072.8 of the Health and Safety Code states:

21 "When a license has been revoked or suspended following a hearing under this article, any
22 additional license issued under this chapter in the name of Soto Smog Incorporated may be
23 likewise revoked or suspended by the director."

24 COST RECOVERY

25 10. Code 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 of
27 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 – SEPTEMBER 9, 2009

2 11. On or about September 9, 2009, a Bureau undercover operator (“operator”) drove a
3 Bureau documented 1987 Chevrolet Nova to Respondent’s facility and requested a smog
4 inspection. The vehicle was missing the Exhaust Gas Recirculation (“EGR”) system, rendering
5 the vehicle incapable of passing a smog inspection. Respondent quoted the operator \$60 for the
6 smog inspection. The operator completed and signed Estimate No. 23145, and was provided with
7 a copy. Gilbert Castillote, a licensed technician, performed the smog inspection and issued
8 electronic Certificate of Compliance No. WD293462, certifying that he had tested and inspected
9 the 1987 Chevrolet Nova, and that the vehicle was in compliance with applicable laws and
10 regulations, when in fact, the vehicle could not have passed the visual portion of the smog
11 inspection, in that the vehicle’s EGR system was missing. The operator paid Respondent \$60,
12 and was provided with a copy of Invoice No. 23145.

13 FIRST CAUSE FOR DISCIPLINE

14 (Untrue or Misleading Statements)

15 12. Respondent’s registration is subject to discipline under Code section 9884.7(a)(1), in
16 that on or about September 9, 2009, it made statements which it knew or which by exercise of
17 reasonable care should have known to be untrue or misleading by issuing electronic Certificate of
18 Compliance No. WD293462 for the 1987 Chevrolet Nova, certifying that the vehicle was in
19 compliance with applicable laws and regulations, when in fact, it could not have passed the visual
20 portion of the smog inspection because the vehicle’s EGR system was missing.

21 SECOND CAUSE FOR DISCIPLINE

22 (Fraud)

23 13. Respondent’s registration is subject to discipline under Code section 9884.7(a)(4), in
24 that on or about September 9, 2009, it committed acts constituting fraud by issuing electronic
25 Certificate of Compliance No. WD293462 for the 1987 Chevrolet Nova without performing a
26 bona fide inspection of the emission control devices and systems on the vehicle, thereby
27 depriving the People of the State of California of the protection afforded by the Motor Vehicle
28 Inspection Program.

1 THIRD CAUSE FOR DISCIPLINE

2 (Failure to Comply with Chapter Requirements)

3 14. Respondent's station license is subject to discipline under Health and Safety Code
4 section 44072.2(a), in that on or about September 9, 2009, regarding the 1987 Chevrolet Nova, it
5 failed to comply with the following sections of that Code:

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

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

11 c. Section 44015(b): Respondent issued electronic Certificate of Compliance No.
12 WD293462 without properly testing and inspecting the vehicle to determine if it was in
13 compliance with Code section 44012.

14 d. Section 44059: Respondent willfully made false entries for electronic Certificate of
15 Compliance No. WD293462 by certifying that the vehicle had been tested and inspected as
16 required, when in fact, it had not.

17 FOURTH CAUSE FOR DISCIPLINE

18 (Failure to Comply with Regulations)

19 15. Respondent's station license is subject to discipline under Health and Safety Code
20 section 44072.2(c), in that on or about September 9, 2009, regarding the 1987 Chevrolet Nova, it
21 failed to comply with provisions of California Code of Regulations, title 16, as follows:

22 a. Section 3340.24(c): Respondent falsely or fraudulently issued electronic Certificate of
23 Compliance No. WD293462, in that the vehicle could not pass the visual portion of the smog
24 inspection because the vehicle's EGR system was missing.

25 b. Section 3340.35(c): Respondent issued electronic Certificate of Compliance No.
26 WD293462 even though the vehicle had not been tested and inspected in accordance with the
27 procedures specified in Code section 3340.42.

28 ///

1 c. Section 3340.42: Respondent failed to conduct the required smog tests and inspections
2 on the vehicle in accordance with the Bureau's specifications.

3 **FIFTH CAUSE FOR DISCIPLINE**

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

5 16. Respondent's station license is subject to discipline under Health and Safety Code
6 section 44072.2(d), in that on or about September 9, 2009, it committed acts involving
7 dishonesty, fraud, or deceit whereby another was injured by issuing electronic Certificate of
8 Compliance No. WD293462 for the 1987 Chevrolet Nova without performing a bona fide
9 inspection of the emission control devices and systems on that vehicle, thereby depriving the
10 People of the State of California of the protection afforded by the Motor Vehicle Inspection
11 Program.

12 **PRIOR CITATIONS**

13 17. To determine the degree of discipline, if any, Complainant alleges the following:

14 **Automotive Repair Dealer Registration and Smog Check Test Only Station License
May 23, 2008**

15 a. On or about May 23, 2008, the Bureau issued Citation No. C08-1040 against
16 Respondent's registration and station licenses for violations of Health and Safety Code section
17 44012(f) (failure to perform a visual/functional check of emission control devices according to
18 procedures prescribed by the department), and California Code of Regulations, title 16, section
19 3340.35(c) (issuing a certificate of compliance to a vehicle that was improperly tested), for
20 issuing a certificate of compliance to a Bureau undercover vehicle that was missing the positive
21 crankcase ventilation system. The Bureau assessed civil penalties totaling \$500 against
22 Respondent for the violations. Respondent complied with this citation on July 8, 2008.

23 **November 24, 2008**

24 b. On or about November 24, 2008, the Bureau issued Citation No. C09-0660 against
25 Respondent's registration and station licenses for violations of Health and Safety Code section
26 44012(f) (failure to perform a visual/functional check of emission control devices according to
27 procedures prescribed by the department), and California Code of Regulations, title 16, section
28 3340.35(c) (issuing a certificate of compliance to a vehicle that was improperly tested), for

1 issuing a certificate of compliance to a Bureau undercover vehicle that was missing an
2 evaporative canister. The Bureau assessed civil penalties totaling \$1,000 against Respondent for
3 the violations. Respondent complied with this citation on January 16, 2009.

4 **May 19, 2009**

5 c. On or about May 19, 2009, the Bureau issued Citation No. C09-1335 against
6 Respondent's registration and station licenses for violations of Health and Safety Code section
7 44012(f) (failure to perform a visual/functional check of emission control devices according to
8 procedures prescribed by the department), and California Code of Regulations, title 16, section
9 3340.35(c) (issuing a certificate of compliance to a vehicle that was improperly tested), for
10 issuing a certificate of compliance to a Bureau undercover vehicle with the ignition timing
11 adjusted beyond the manufacturer's specifications. The Bureau assessed civil penalties totaling
12 \$2,000 against Respondent for the violations. Respondent complied with this citation on
13 July 15, 2009.

14 **OTHER MATTERS**

15 18. Under Code section 9884.7(c), the director may invalidate temporarily or
16 permanently or refuse to validate, the registrations for all places of business operated in this state
17 by Soto Smog Incorporated, upon a finding that it has, or is, engaged in a course of repeated and
18 willful violation of the laws and regulations pertaining to an automotive repair dealer.

19 19. Under Health and Safety Code section 44072.8, if Smog Check Station License
20 Number TC 223617, issued to Soto Smog Incorporated, is revoked or suspended, any additional
21 license issued under this chapter in the name of Soto Smog Incorporated may be likewise revoked
22 or suspended by the director.

23 **PRAYER**

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

26 1. Temporarily or permanently invalidating Automotive Repair Dealer Registration No.
27 ARD 223617, issued to Soto Smog Incorporated;

28 ///

1 2. Temporarily or permanently invalidating any other automotive repair dealer
2 registration issued to Soto Smog Incorporated;

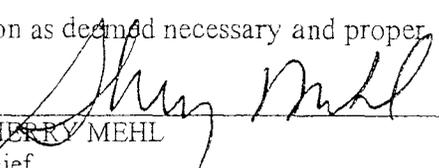
3 3. Revoking or suspending Smog Check Test Only Station License Number
4 TC 223617, issued to Soto Smog Incorporated;

5 4. Revoking or suspending any additional license issued under Chapter 5 of
6 Health and Safety Code in the name of Soto Smog Incorporated;

7 5. Ordering Soto Smog Incorporated to pay the Director of Consumer Affairs the
8 reasonable costs of the investigation and enforcement of this case, pursuant to Code section
9 125.3; and,

10 6. Taking such other and further action as deemed necessary and proper.

11 DATED: 6/23/10



SHERRY MEHL
Chief

Bureau of Automotive Repair I/M Smog
Department of Consumer Affairs
State of California
Complainant

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