

1 ROB BONTA
Attorney General of California
2 CARL W. SONNE
Senior Assistant Attorney General
3 GREGORY J. SALUTE
Supervising Deputy Attorney General
4 State Bar No. 164015
600 West Broadway, Suite 1800
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
Telephone: (619) 738-9431
7 Facsimile: (619) 645-2061
Attorneys for Complainant

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

12 In the Matter of the Accusation Against:

Case No. 79/22-18823

13 **The Truck Town Inc,**
14 **Angel Vargas, President, Alvazo Urzua,**
Treasurer
15 **2748 14th Street**
Riverside, CA 92507

ACCUSATION

16 **Automotive Repair Dealer License Number**
17 **ARD 270941, Smog Check and Repair**
Station License Number RC 270941

18 **-and-**

19 **Alex Urzua**
20 **411 W Alton Ave. Apt F**
Santa Ana, CA 92707

21 **Smog Check Inspector License Number EO**
22 **639699, Smog Check Repair Technician**
License Number EI 639699

23
24 Respondents.

25
26 **PARTIES**

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

2. On or about November 21, 2012, the Bureau of Automotive Repair issued Automotive Repair Dealer License Number ARD 270941 to The Truck Town Inc. Angel Vargas, President, Alvazo Urzua, Treasurer (Respondents or Respondent Truck Town). The Automotive Repair Dealer License was in full force and effect at all times relevant to the charges brought herein and will expire on November 30, 2023, unless renewed.

3. On or about June 23, 2020, the Bureau of Automotive Repair issued Smog Check Station License Number RC 270941 to The Truck Town Inc., Angel Vargas, President, Alvazo Urzua, Treasurer. The Smog Check and Repair Station License was in full force and effect at all times relevant to the charges brought herein and will expire on November 30, 2023, unless renewed.

4. Respondent is also certified as a STAR Station. The certification was issued on August 14, 2020, and will remain active unless the ARD registration and/or Smog Check Station license is revoked, canceled, licenses become delinquent or the certification is invalidated.

5. On or about September 20, 2016, the Bureau of Automotive Repair issued Smog Check Inspector License Number EO 639699 to Alex Urzua¹ (Respondents or Respondent Urzua). The Smog Check Inspector License was in full force and effect at all times relevant to the charges brought herein and will expire on December 31, 2024, unless renewed.

6. On or about September 19, 2016, the Bureau of Automotive Repair issued Smog Check Repair Technician License Number EI 639699 to Alex Urzua. The Smog Check Repair Technician License expired on December 31, 2024, unless renewed.

JURISDICTION

7. This Accusation is brought before the Director of the Department of Consumer Affairs ("Director") for the Bureau, under the authority of the following laws.

8. Section 9884.7 of the Business and Professions Code² provides that the Director may revoke an ARD registration.

¹ At all times alleged herein, Respondent Alex Urzua was acting as an employee of Respondent Truck Town and committed the acts alleged herein in the course and scope of his employment at Respondent Truck Town.

² All statutory references herein shall be to the Business and Professions Code unless specifically stated otherwise.

9. Section 9884.13 of the Code provides, in pertinent part, that the expiration of a valid registration shall not deprive the director or chief of jurisdiction to proceed with a disciplinary proceeding against an automotive repair dealer or to render a decision invalidating a registration temporarily or permanently.

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

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

STATUTORY PROVISIONS

12. Section 9884.7 of the Code states:

(a) The director, where the automotive repair dealer cannot show there was a bona fide error, may deny, suspend, revoke, or place on probation the registration of an automotive repair dealer for any of the following acts or omissions related to the conduct of the business of the automotive repair dealer, which are done by the automotive repair dealer or any automotive technician, employee, partner, officer, or member of the automotive repair dealer.

(1) Making or authorizing in any manner or by any means whatever any statement written or oral which is untrue or misleading, and which is known, or which by the exercise of reasonable care should be known, to be untrue or misleading.

• • •

(4) Any other conduct which constitutes fraud.

• • •

(6) Failure in any material respect to comply with the provisions of this chapter or regulations adopted pursuant to it.

13. Section 44072.2 of the Health and Safety Code states:

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

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

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

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

5 14. Section 44072.10 of the Health and Safety Code states, in pertinent part:

6 . . .

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

11 (1) Clean piping, as defined by the department. . . .

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

14 **REGULATORY PROVISIONS**

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

16 The bureau may suspend or revoke the license of or pursue other legal action
17 against a licensee, if the licensee falsely or fraudulently issues or obtains a certificate
18 of compliance or a certificate of noncompliance.

19 16. California Code of Regulations, title 16, section 3340.30, states:

20 A smog check technician shall comply with the following requirements at all
21 times while licensed.

22 (a) A licensed technician shall inspect, test and repair vehicles in accordance
23 with section 44012 of the Health and Safety Code, section 44035 of the Health and
24 Safety Code, and section 3340.42 of this article. . . .”

25 17. California Code of Regulations, title 16, section 3340.35, states, in pertinent part:

26

27 (c) A licensed station shall issue a certificate of compliance or noncompliance
28 to the owner or operator of any vehicle that has been inspected in accordance with the
procedures specified in section 3340.42 of this article and has all the required
emission control equipment and devices installed and functioning correctly. . . .

18 18. California Code of Regulations, title 16, section 3340.42, sets forth specific emissions
19 test methods and procedures which apply to all vehicles inspected in the State of California.

20 **COST RECOVERY**

21 19. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
22 administrative law judge to direct a licensee found to have committed a violation or violations of

1 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
2 enforcement of the case, with failure of the licentiate to comply subjecting the license to not being
3 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
4 included in a stipulated settlement.

5 **VID DATA REVIEW**

6 20. Beginning March 9, 2015, California's Smog Check Program was updated to require
7 the use of an On-Board Diagnostic Inspection System ("OIS"). OIS is the Smog Check
8 equipment required in all areas of the State when inspecting most model-year 2000 and newer
9 gasoline and hybrid vehicles and most 1998 and newer diesel vehicles. The system consists of a
10 certified Data Acquisition Device ("DAD"), computer, bar code scanner, and printer. The DAD
11 is an On Board Diagnostic ("OBD") scan tool that, when requested by the California OIS
12 software, retrieves OBD data from the vehicle. All OBD data that the vehicle indicates it
13 supports is requested by the California OIS software and will be retrieved. The DAD connects
14 between the OIS computer and the vehicle's DLC. The California OIS software requires a
15 continuous Internet connection when performing a Smog Check inspection and the OIS software
16 communicates with BAR's central database through the Internet connection. The bar code
17 scanner is used to input technician information, the vehicles identification number ("VIN"), and
18 DMV renewal information. The printer provides a Vehicle Inspection Report ("VIR") containing
19 inspection results for motorists and a Smog Check Certificate of Compliance number for passing
20 vehicles.

21 21. Data retrieved and recorded during an OIS smog check includes; the eVIN, which is
22 the digitally stored VIN programmed into the vehicle's Powertrain Control Module ("PCM"); the
23 communication protocol, which is the manufacturer/vehicle specific language the PCM uses to
24 relay information; and the number of Parameter Identifications ("PIDs"), which is the number of
25 specific data values each PCM uses related to emissions controls.

26 22. If the vehicle passes the visual, functional and tailpipe tests, it passes the overall
27 inspection and a Certificate of Compliance is issued and transmitted electronically to the Vehicle
28 Information Database ("VID"). These Certificates of Compliance are purchased in blocks of fifty

1 (50) through the EIS or OIS from the VID, using a pre-arranged electronic bank account debit
2 system or by check, via mail, from Bureau Headquarters in Sacramento. Each Certificate of
3 Compliance has a unique control number so that it can be tracked to determine which Smog
4 Check Station purchased the Certificate of Compliance and to which vehicle it was issued.

5 23. The VID contains registration data from Department of Motor Vehicles (“DMV”)
6 plus emission standards, vehicle smog check inspections, smog check stations and technicians,
7 and Certificates of Compliance. The VID receives the passing smog check results immediately
8 following the inspection. During the vehicle registration process, the DMV accesses the VID to
9 verify that the vehicle has been tested and certified. The Bureau can also access the VID to view
10 test data on smog check inspections performed at any Smog Check Station, or search for, retrieve,
11 and print a test record for a particular vehicle which has been tested. The EIS or OIS, depending
12 on the test type, also prints a Vehicle Inspection Report (“VIR”), which is a physical record of the
13 test results and shows the Certificate of Compliance number that was issued if the vehicle passed
14 the smog inspection.

15 24. The smog check technician must sign the VIR under penalty of perjury to indicate
16 that the inspection was done within Bureau guidelines. Smog Check Stations are required by law
17 to maintain a copy of the VIR along with a copy of the repair invoice for three years. The
18 consumer’s VIR serves as a receipt and proof that the VID was updated and a Certificate of
19 Compliance was issued. Licensed Smog Check Technicians are the only persons authorized by
20 the Bureau to perform official inspections. They are issued a personal access code and a license,
21 which are used to gain access to the EIS and OIS to perform smog check inspections.
22 Unauthorized use of another technician’s access code or license is prohibited.

23 25. Respondents have engaged in numerous acts or omissions constituting violations of
24 the Automotive Repair Act (Business and Professions Code section 9880 *et seq.*) and Motor
25 Vehicle Inspection Program (Health and Safety Code section 44000 *et seq.*) through their practice
26 of “clean plugging.”³ Respondent Urzua’s OIS Test Data available on the State database

27 ³ “Clean plugging” refers to the use of another vehicle’s properly functioning On Board
28 Diagnostic, generation II, (OBD II) system, or another source, to generate passing diagnostic

1 indicates that Respondent Urzua is involved in fraudulent smog inspection activities. A Bureau
2 representative initiated an investigation based on information transmitted to the VID for smog
3 check inspections performed by Respondent Urzua. The investigation revealed that the data
4 related to certain vehicles certified by Respondent Urzua contained a pattern of unmistakable
5 discrepancies between the information transmitted during the inspections and documented
6 information known about the vehicles at issue. Specifically, the representative compared the data
7 received from the certified vehicles to data from vehicles of the same year, make, and model and
8 determined that the data from at least seven (7) of the certified vehicles contained two or more of
9 the following unmistakable discrepancies: (1) incorrect eVINs; (2) incorrect vehicle
10 communication protocols; and (3) incorrect PID counts. These documented discrepancies
11 confirm that the vehicles receiving smog certificates from Respondent Truck Town were
12 fraudulently tested by Respondent Urzua during the smog inspection using the “clean plugging”
13 method as follows:

14 **Clean plug #1 June 6, 2021:**

15 26. Bureau Program representative Steve Koch (Koch) reviewed the OIS Test Data for
16 The Truck Town Inc. The review indicates that on June 6, 2021, a 2005 Honda Accord LX, VIN
17 1HGCM56485L003888, CA license 6AXK103, was tested and smog certificate #RY885738C
18 was issued under licensed Smog Check Inspector # EO639699, Urzua. The OIS Test Data for the
19 2005 Honda Accord LX shows the expected eVIN was transmitted, the communication protocol
20 was transmitted as ICAN29bt5 and the PID count was 37/19.

21 27. Similar Vehicle OIS Test Data for 2005 Honda Accord LX vehicles show they
22 transmit the eVIN, they had the expected communication protocol I914 and they transmit a PID
23 count of 21.

24 28. A previous test for the 2005 Honda Accord LX, VIN 1HGCM56485L003888, CA
25 license 6AXK103, was performed at another station on June 2, 2021. The OIS Test Data for the
26 2005 Honda Accord LX transmitted the expected eVIN, had the expected communication

27 readings for the purpose of issuing fraudulent smog Certificates of Compliance to vehicles that
28 are not in smog compliance and/or not present for testing.

protocol I914, and transmitted the expected PID count of 21. The 2005 Honda Accord failed the OBDII portion of the Smog Check inspection for an illuminated MIL and stored diagnostic trouble code P0141.

Clean plug #2 January 13, 2022:

29. Koch reviewed the OIS Test Data for The Truck Town Inc. His review indicates that on January 13, 2022, a 2006 Ford F350 SRW Super Duty, VIN 1FTWW30P26ED27194, CA license 7Z43410, was tested and smog certificate #SK148028C was issued under licensed Smog Check Inspector # EO639699, Urzua. The OIS Test Data for the 2006 Ford F350 SRW Super Duty shows the eVIN was not transmitted, the communication protocol was transmitted as JPWM and the PID count was 4.

30. Similar Vehicle OIS Test Data for 2006 Ford F350 SRW Super Duty vehicles show they do not transmit the eVIN, they had the expected communication protocol ICAN11bt5 and they transmit a PID count of 25/13/0.

Surveillance: December 14, 2022

31. The following chart illustrates the documented clean plugging activities of Respondent Urzua on December 14, 2022.

URZUA CLEAN PLUGGING ACTIVITIES ON DECEMBER 14, 2022

Fraudulent Smog Check inspections performed at The Truck Town Inc on December 14, 2022 by Respondent Alex Urzua (EO639699) on OIS #CV017559 using the clean plugging method.

Time of Certification			Vehicle Certified	Vehicle(s) In Testing Bay	Certificate #
Date	Start	End			
12/14/22	1819	1830	2009 Ford Focus (6PKS068)	None	TA707568C
12/14/22	1831	1839	2006 Ford Expedition (7LFD014)	None	TA707569C
12/14/22	1841	1849	2005 Chevrolet Aveo (7EWW237)	None	TA707570C
12/14/22	1851	1912	2008 Chevrolet Avalanche (8K89686)	None	TA707571C
12/14/22	1914	1923	2006 Chevrolet Suburban (1GNEC16Z16J121333)	None	TA707572C

32. Respondents' smog check activities on June 6, 2021, January 13, 2022, and December 14, 2022, show that Respondents participated in a scheme to perform at least seven (7) fraudulent Smog Check inspections resulting in the issuance of seven (7) fraudulent electronic Smog Check Certificates of Compliance.

FIRST CAUSE FOR DISCIPLINE

(Untrue or Misleading Statements - Respondent Truck Town)

33. Respondent Truck Town's registration is subject to disciplinary action pursuant to section 9884.7, subdivision (a)(1), in that on June 6, 2021, January 13, 2022, and December 14, 2022, Respondent Urzua made or authorized statements which he knew or in the exercise of reasonable care should have known to be untrue or misleading, as follows: Respondent Urzua certified that the vehicles set forth above in paragraphs 26-32, had passed inspection and were in compliance with applicable laws and regulations. In fact, Respondent Urzua conducted the inspections on those vehicles using the clean plugging method in order to issue smog certificates of compliance, and did not test or insect the vehicles as required by Health and Safety Code section 44012.

SECOND CAUSE FOR DISCIPLINE

(Fraud - Respondent Truck Town)

34. Respondent Truck Town's registration is subject to disciplinary action pursuant to section 9884.7, subdivision (a)(4), in that on June 6, 2021, January 13, 2022, and December 14, 2022, Respondent Truck Town's employee Respondent Urzua committed acts which constitute fraud by issuing electronic certificates of compliance for the vehicles set forth above in paragraphs 26-32, without performing bona fide inspections of the emission control devices and systems on those vehicles, thereby depriving the People of the State of California of the protection afforded by the Motor Vehicle Inspection Program.

///

///

///

///

1 **THIRD CAUSE FOR DISCIPLINE**

2 **(Failure to Comply with the Motor Vehicle Inspection Program –**
3 **Respondent Truck Town)**

4 35. Respondent Truck Town's smog station and repair license is subject to disciplinary
5 action pursuant to Health and Safety Code section 44072.2, subdivision (a), in conjunction with
6 Health and Safety Code section 44072.10 subdivision (c), in that on June 6, 2021, January 13,
7 2022, and December 14, 2022, regarding the vehicles set forth above in paragraphs 26-32,
8 Respondent Truck Town failed to comply with the following sections of the Health and Safety
9 Code:

10 (a) **Section 44012**: Respondent Truck Town's employee Respondent Urzua failed to
11 ensure that the emission control tests were performed on the vehicles, in accordance with
12 procedures prescribed by the department.

13 (b) **Section 44015**: Respondent Truck Town's employee Respondent Urzua issued
14 electronic certificates of compliance for the vehicles, without ensuring that the vehicles were
15 properly tested and inspected to determine if they were in compliance with Health and Safety
16 Code section 44012.

17 **FOURTH CAUSE FOR DISCIPLINE**

18 **(Failure to Comply with Regulations Pursuant to the Motor Vehicle Inspection Program -**
19 **Respondent Truck Town)**

20 36. Respondent Truck Town's smog station and repair license is subject to disciplinary
21 action pursuant to Health and Safety Code section 44072.2, subdivision (c), in that on June 6,
22 2021, January 13, 2022, and December 14, 2022, regarding the vehicles set forth above in
23 paragraphs 26-32, Respondent Urzua failed to comply with the following provisions of the
24 California Code of Regulations, Title 16, as follows:

25 (a) **Section 3340.35, subdivision (c)**: Respondent Truck Town's employee Respondent
26 Urzua issued electronic certificates of compliance even though those vehicles had not been
27 inspected in accordance with section 3340.42, Title 16, of the California Code of Regulations.

28 ///

1 (b) **Section 3340.42**: Respondent Truck Town's employee Respondent Urzua failed to
2 conduct the required smog tests and inspections on those vehicles in accordance with the
3 Bureau's specifications.

4 **FIFTH CAUSE FOR DISCIPLINE**

5 **(Dishonesty, Fraud or Deceit - Respondent Truck Town)**

6 37. Respondent Truck Town's smog station and repair license is subject to disciplinary
7 action pursuant to Health and Safety Code section 44072.2, subdivision (d), in conjunction with
8 Health and Safety Code section 44072.10 subdivision (c), in that on June 6, 2021, January 13,
9 2022, and December 14, 2022, regarding the vehicles set forth above in paragraphs 26-32,
10 Respondent Truck Town's employee Respondent Urzua committed acts involving dishonesty,
11 fraud or deceit whereby another was injured by issuing electronic certificates of compliance for
12 those vehicles without performing bona fide inspections of the emission control devices and
13 systems on the vehicles, thereby depriving the People of the State of California of the protection
14 afforded by the Motor Vehicle Inspection Program.

15 **SIXTH CAUSE FOR DISCIPLINE**

16 **(Violations of the Motor Vehicle Inspection Program – Respondent Urzua)**

17 38. Respondent Urzua's smog check inspector and smog check repair technician license
18 are subject to discipline pursuant to Health and Safety Code section 44072.2, subdivision (a), in
19 that on June 6, 2021, January 13, 2022, and December 14, 2022, regarding the vehicles set forth
20 above in paragraphs 26-32, Respondent Urzua failed to comply with section 44012 of the Health
21 and Safety Code in a material respect, as follows: Respondent Urzua failed to perform the
22 emission control tests on those vehicles in accordance with procedures prescribed by the
23 department.

24 **SEVENTH CAUSE FOR DISCIPLINE**

25 **(Failure to Comply with Regulations Pursuant to the Motor Vehicle Inspection Program –**
26 **Respondent Urzua)**

27 39. Respondent Urzua's smog check inspector and smog check repair technician license
28 are subject to discipline pursuant to Health and Safety Code section 44072.2, subdivision (c), in

1 that on June 6, 2021, January 13, 2022, and December 14, 2022, regarding the vehicles set forth
2 above in paragraphs 26-32, Respondent Urzua failed to comply with provisions of the California
3 Code of Regulations, title 16, as follows:

4 (a) **Section 3340.30, subdivision (a)**: Respondent Urzua failed to inspect and test those
5 vehicles in accordance with Health and Safety Code section 44012.

6 (b) **Section 3340.41, subdivision (c)**: Respondent Urzua entered false information into
7 the EIS.

8 (c) **Section 3340.42**: Respondent Urzua failed to conduct the required smog tests and
9 inspections on those vehicles in accordance with the Bureau's specifications.

10 **EIGHTH CAUSE FOR DISCIPLINE**

11 **(Dishonesty, Fraud or Deceit - Respondent Urzua)**

12 40. Respondent Urzua's smog check inspector and smog check repair technician license
13 are subject to discipline pursuant to Health and Safety Code section 44072.2, subdivision (d), in
14 conjunction with Health and Safety Code section 44072.10 subdivision (c), in that on June 6,
15 2021, January 13, 2022, and December 14, 2022, regarding the vehicles set forth above in
16 paragraphs 26-32, Respondent Urzua committed acts involving dishonesty, fraud or deceit
17 whereby another was injured by issuing electronic certificates of compliance for those vehicles
18 without performing bona fide inspections of the emission control devices and systems on the
19 vehicles., thereby depriving the People of the State of California of the protection afforded by the
20 Motor Vehicle Inspection Program.

21 **OTHER MATTERS**

22 41. Pursuant to Business & Professions Code section 9884.7, subdivision (c), the Director
23 may suspend, revoke, or place on probation the registration for all places of business operated in
24 this State by Respondent Truck Town upon a finding that Respondent Truck Town has, or is,
25 engaged in a course of repeated and willful violations of the laws and regulations pertaining to an
26 automotive repair dealer.

27 42. Pursuant to Health & Safety Code section 44072.8, if Smog Check Station and Repair
28 License Number RC 270941 issued to Respondent Truck Town is revoked or suspended

1 following a hearing under this article, any additional license issued under Chapter 5, Part 5,
2 Division 26 in the name of said licensee may be likewise revoked or suspended by the Director.

3 43. Pursuant to Health & Safety Code section 44072.8, if Smog Check Inspector License
4 Number EO 639699, or Smog Check Repair License Number EI 639699 issued to Respondent
5 Urzua, are revoked or suspended following a hearing under this article, any additional license
6 issued under Chapter 5, Part 5, Division 26 in the name of said licensee may be likewise revoked
7 or suspended by the Director.

8 **PRAYER**

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

12 1. Revoking or suspending Automotive Repair Dealer Registration Number ARD
13 270941, issued to The Truck Town Inc.;

14 2. Revoking or suspending any other Automotive Repair Dealer Registration issued to
15 Respondent The Truck Town Inc.;

16 3. Revoking or suspending Smog Check Station and Repair License Number RC
17 270941, issued to The Truck Town Inc.;

18 4. Revoking or suspending any additional license issued under Chapter 5 of Part 5 of
19 Division 26 of the Health and Safety Code in the name of Respondent The Truck Town Inc.;

20 5. Revoking or suspending Smog Check Inspector License Number EO 639699, issued
21 to Alex Urzua;

22 6. Revoking or suspending Smog Check Repair License Number EI 639699, issued to
23 Alex Urzua;

24 7. Revoking or suspending any additional license issued under Chapter 5 of Part 5 of
25 Division 26 of the Health and Safety Code in the name of Respondent Alex Urzua;

26 8. Ordering The Truck Town Inc., and/or Alex Urzua to pay the Bureau of Automotive
27 Repair the reasonable costs of the investigation and enforcement of this case, pursuant to
28 Business and Professions Code section 125.3; and,

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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

DATED: As of digital signature date

PATRICK DORAIS
Chief
Bureau of Automotive Repair
Department of Consumer Affairs
State of California
Complainant

SD2023801371
83945902.docx