

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

In the Matter of the Accusation Against:

**Z & M SMOG & REPAIR**  
**AHMAD ZIA CHOPAN, PARTNER**  
**MIKHAIL IVANOVICH TKACHEV,**  
**PARTNER**  
613 Galveston  
West Sacramento, CA 95691

Automotive Repair Dealer Reg. No. ARD 216481  
Smog Check Station License No. RC 216481  
Lamp Station License No. LS 216481  
Brake Station License No. BS 216481

and

**AHMAD ZIA CHOPAN**  
613 Galveston Street  
West Sacramento, CA 95691

Smog Check Inspector License No. EO 132232  
Smog Check Repair Technician License No.  
EI 132232 (formerly Advanced Emission  
Specialist Technician License No. EA 132232)  
Brake Adjuster License No. BA 132232  
Lamp Adjuster License No. LA 132232

Respondents.

Case No. 77/15-29

OAH No. 2015020425

**DECISION**

The attached Stipulated Settlement and Order is hereby accepted and adopted as the Decision of the Director of the Department of Consumer Affairs in the above-entitled matter; except that the following typographical error is corrected as follows:

1. Page 1, case caption: The license "ADR 196010" is corrected to "ARD 196010".

This Decision shall become effective \_\_\_\_\_

DATED: \_\_\_\_\_

*06/23/2016*

*August 8, 2016*

*[Signature]*

KURT HEPPLER  
Supervising Attorney  
Division of Legal Affairs  
Department of Consumer Affairs

1 KAMALA D. HARRIS  
Attorney General of California  
2 JANICE K. LACHMAN  
Supervising Deputy Attorney General  
3 JEFFREY M. PHILLIPS  
Deputy Attorney General  
4 State Bar No. 154990  
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*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:

Case No. 77/15-29

13 **Z & M SMOG & REPAIR**  
14 **AHMAD ZIA CHOPAN, PARTNER**  
**MIKHAIL IVANOVICH TKACHEV,**  
15 **PARTNER**  
16 **613 Galveston**  
**West Sacramento, CA 95691**

OAH No. 2015020425

**STIPULATED SETTLEMENT AND**  
**DISCIPLINARY ORDER**

17 **Automotive Repair Dealer Reg. No. ARD**  
**216481**  
18 **Smog Check Station License No. RC 216481**  
**Lamp Station License No. LS 216481**  
19 **Brake Station License No. BS 216481**

20 **and**

21 **AHMAD ZIA CHOPAN**  
**613 Galveston Street**  
**West Sacramento, CA 95691**

22 **Smog Check Inspector License No. EO**  
23 **132232**  
24 **Smog Check Repair Technician License No.**  
**EI 132232 (formerly Advanced Emission**  
25 **Specialist Technician License No. EA**  
**132232)**  
26 **Brake Adjuster License No. BA 132232**  
**Lamp Adjuster License No. LA 132232**

27 Respondents.  
28

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

3 PARTIES

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

8 Z & M Smog & Repair

9 2. In or about 2001, the Director of Consumer Affairs ("Director") issued Automotive  
10 Repair Dealer Registration Number ARD 216481 ("registration") to Z & M Smog & Repair  
11 ("Respondent Z & M"), with Ahmad Zia Chopan ("Respondent Chopan") and Mikhail Ivanovich  
12 Tkachev as partners. The registration was in full force and effect at all times relevant to the  
13 charges brought herein and will expire on May 31, 2016, unless renewed.

14 3. On or about July 30, 2001, the Director issued Smog Check Station License Number  
15 RC 216481 to Respondent Z & M. The smog check station license was in full force and effect at  
16 all times relevant to the charges brought herein and will expire on May 31, 2016, unless renewed.

17 4. On or about July 26, 2001, the Director issued Lamp Station License Number LS  
18 216481 to Respondent Z & M. The lamp station license was in full force and effect at all times  
19 relevant to the charges brought herein and will expire on May 31, 2016, unless renewed.

20 5. On or about July 26, 2001, the Director issued Brake Station License Number BS  
21 216481 to Respondent Z & M. The brake station license was in full force and effect at all times  
22 relevant to the charges brought herein and will expire on May 31, 2016, unless renewed.

23 Ahmad Zia Chopan

24 6. In or about 1997, the Director issued Advanced Emission Specialist Technician  
25 License Number EA 132232 to Respondent Chopan. Respondent's advanced emission specialist  
26 technician license expired on September 30, 2012. Pursuant to California Code of Regulations,  
27 title 16, section 3340.28, subdivision (e), the license was renewed, pursuant to Respondent's  
28 election, as Smog Check Inspector License Number EO 132232 and Smog Check Repair

1 Technician License Number EI 132232 ("technician licenses"), effective August 17, 2012.

2 Respondent's technician licenses will expire on September 30, 2017, unless renewed.

3 7. In or about 2001, the Director issued Brake Adjuster License Number BA 132232 to  
4 Respondent Chopan. The brake adjuster license was in full force and effect at all times relevant  
5 to the charges brought herein and will expire on September 30, 2017, unless renewed.

6 8. In or about 1997, the Director issued Lamp Adjuster License Number LA 132232 to  
7 Respondent Chopan. The lamp adjuster license was in full force and effect at all times relevant to  
8 the charges brought herein and will expire on September 30, 2017, unless renewed.

9 **JURISDICTION**

10 2. Accusation No. 77/15-29 was filed before the Director of Consumer Affairs  
11 (Director), for the Bureau of Automotive Repair (Bureau), and is currently pending against  
12 Respondents. The Accusation and all other statutorily required documents were properly served  
13 on Respondents on January 20, 2015. Respondents timely filed their Notice of Defense  
14 contesting the Accusation.

15 3. A copy of Accusation No. 77/15-29 is attached as exhibit A and incorporated herein  
16 by reference.

17 **ADVISEMENT AND WAIVERS**

18 4. Respondents have carefully read, fully discussed with counsel, and understands the  
19 charges and allegations in Accusation No. 77/15-29. Respondents have also carefully read, fully  
20 discussed with counsel, and understand the effects of this Stipulated Settlement and Disciplinary  
21 Order.

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



1 the parties, and the Director shall not be disqualified from further action by having considered  
2 this matter.

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

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

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

15 **DISCIPLINARY ORDER**

16 IT IS HEREBY ORDERED that Lamp Station License No. LS 216481 and Brake Station  
17 License No. BS 216481 issued to Respondent Z & M Smog & Repair, Ahmad Zia Chopan,  
18 Partner, and Mikhail Ivanovich Tkachev, Partner is revoked. Respondents shall turn in all  
19 licenses, wall certificates, and pocket licenses cards for Lamp Station No. LS 216481 and Brake  
20 Station No. BS 216481 by the effective date of this decision.

21 IT IS HEREBY ORDERED that Brake Adjuster License No. BA 132232 and Lamp  
22 Adjuster License No. LA 132232 issued to Respondent Ahmad Zia Chopan, is revoked.  
23 Respondent Chopan shall also turn in all licenses, wall certificates, and pocket licenses cards for  
24 Brake Adjuster License No. BA 132232 and Lamp Adjuster License No. LA 132232 by the  
25 effective date of this decision.

26 IT IS ALSO HEREBY ORDERED that Automotive Repair Dealer Registration No. ARD  
27 216481 and Smog Check Station License No. RC 216481 are also revoked. However, as to the  
28 Automotive Repair Dealer Registration and Smog Check Station License only, the revocation is

1 stayed and Respondent Z & M is placed on probation for three (3) years on the following terms  
2 and conditions.

3 IT IS ALSO HEREBY ORDERED that Smog Check Inspector License No. EO 132232  
4 and Smog Check Repair Technician License No. EI 132232 issued to Respondent Chopan are  
5 also revoked. However, as to the Smog Check Inspector License and the Smog Check Repair  
6 Technician License only, the revocation is stayed and Respondent Chopan is placed on probation  
7 for three (3) years on the following terms and conditions.

8 1. **Obey All Laws.** Comply with all statutes, regulations and rules governing  
9 automotive inspections, estimates and repairs.

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

14 3. **Report Financial Interest.** Within 30 days of the effective date of this action, report  
15 any financial interest which any partners, officers, or owners of the Respondents facility may  
16 have in any other business required to be registered pursuant to Section 9884.6 of the Business—  
17 and Professions Code.

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

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

24 6. **Violation of Probation.** Should the Director of Consumer Affairs determine that any  
25 Respondent has failed to comply with the terms and conditions of probation, the Department may,  
26 after giving notice and opportunity to be heard, may temporarily or permanently invalidate the  
27 registration and/ or suspend or revoke the licenses.

28 //



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

3  
4 DATED: \_\_\_\_\_  
5 AHMAD ZIA CHOPAN,  
6 Respondent

7 I have read and fully discussed with Respondent Z & M Smog & Repair, Ahmad Zia  
8 Chopan, Partner, and Mikhail Ivanovich Tkachev, Partner the terms and conditions and other  
9 matters contained in the above Stipulated Settlement and Disciplinary Order. I have also read and  
10 fully discussed with Respondent Ahmad Zia Chopan the terms and conditions and other matters  
11 contained in the above Stipulated Settlement and Disciplinary Order.

12 I approve its form and content.

13 DATED: \_\_\_\_\_  
14 Michael B. Levin Esq.  
15 Attorney for Respondent

16 ENDORSEMENT

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

19  
20 Dated: \_\_\_\_\_ Respectfully submitted,  
21 KAMALA D. HARRIS  
22 Attorney General of California  
23 JANICE K. LACHMAN  
24 Supervising Deputy Attorney General

25 JEFFREY M. PHILLIPS  
26 Deputy Attorney General  
27 *Attorneys for Complainant*

28 SA2014116529  
12130713

**Exhibit A**

**Accusation No. 77/15-29**

1 KAMALA D. HARRIS  
Attorney General of California  
2 JANICE K. LACHMAN  
Supervising Deputy Attorney General  
3 JEFFREY M. PHILLIPS  
Deputy Attorney General  
4 State Bar No. 154990  
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6 Telephone: (916) 324-6292  
Facsimile: (916) 327-8643  
7 *Attorneys for Complainant*

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. 77/13-29

13 **Z & M SMOG & REPAIR**  
14 **AHMAD ZIA CHOPAN, PARTNER**  
15 **MIKHAIL IVANOVICH TKACHEV, PARTNER**  
16 **613 Galveston**  
17 **West Sacramento, CA 95691**

**A C C U S A T I O N**

18 **Automotive Repair Dealer Reg. No. ARD 216481**  
19 **Smog Check Station License No. RC 216481**  
20 **Lamp Station License No. LS 216481**  
21 **Brake Station License No. BS 216481**

22 **and**

23 **AHMAD ZIA CHOPAN**  
24 **613 Galveston Street**  
25 **West Sacramento, CA 95691**

26 **Smog Check Inspector License No. EO 132232**  
27 **Smog Check Repair Technician License No.**  
28 **EI 132232 (formerly Advanced Emission Specialist**  
**Technician License No. EA 132232)**  
**Brake Adjuster License No. BA 132232**  
**Lamp Adjuster License No. LA 132232**

Respondents.

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///

1 Complainant alleges:

2 **PARTIES**

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

5 **Z & M Smog & Repair**

6 2. In or about 2001, the Director of Consumer Affairs (“Director”) issued Automotive  
7 Repair Dealer Registration Number ARD 216481 (“registration”) to Z & M Smog & Repair  
8 (“Respondent Z & M”), with Ahmad Zia Chopan (“Respondent Chopan”) and Mikhail Ivanovich  
9 Tkachev as partners. The registration was in full force and effect at all times relevant to the  
10 charges brought herein and will expire on May 31, 2015, unless renewed.

11 3. On or about July 30, 2001, the Director issued Smog Check Station License Number  
12 RC 216481 to Respondent Z & M. The smog check station license was in full force and effect at  
13 all times relevant to the charges brought herein and will expire on May 31, 2015, unless renewed.

14 4. On or about July 26, 2001, the Director issued Lamp Station License Number LS  
15 216481 to Respondent Z & M. The lamp station license was in full force and effect at all times  
16 relevant to the charges brought herein and will expire on May 31, 2015, unless renewed.

17 5. On or about July 26, 2001, the Director issued Brake Station License Number BS  
18 216481 to Respondent Z & M. The brake station license was in full force and effect at all times  
19 relevant to the charges brought herein and will expire on May 31, 2015, unless renewed.

20 **Ahmad Zia Chopan**

21 6. In or about 1997, the Director issued Advanced Emission Specialist Technician  
22 License Number EA 132232 to Respondent Chopan. Respondent's advanced emission specialist  
23 technician license expired on September 30, 2012. Pursuant to California Code of Regulations,  
24 title 16, section 3340.28, subdivision (e), the license was renewed, pursuant to Respondent's  
25 election, as Smog Check Inspector License Number EO 132232 and Smog Check

26 ///  
27 ///  
28 ///

1 Repair Technician License Number EI 132232 ("technician licenses"), effective August 17,  
2 2012.<sup>1</sup> Respondent's Smog Check Repair Technician License expired on September 30, 2014 and  
3 had not been renewed, and his Smog Check Inspector License will expire on September 30, 2016,  
4 unless renewed.

5 7. In or about 2001, the Director issued Brake Adjuster License Number BA 132232 to  
6 Respondent Chopan. The brake adjuster license was in full force and effect at all times relevant  
7 to the charges brought herein and will expire on September 30, 2017, unless renewed.

8 8. In or about 1997, the Director issued Lamp Adjuster License Number LA 132232 to  
9 Respondent Chopan. The lamp adjuster license was in full force and effect at all times relevant to  
10 the charges brought herein and will expire on September 30, 2017, unless renewed.

### 11 JURISDICTION

12 9. Business and Professions Code ("Bus. & Prof. Code") section 9884.7 provides that  
13 the Director may revoke an automotive repair dealer registration.

14 10. Bus. & Prof. Code section 9884.13 provides, in pertinent part, that the expiration of a  
15 valid registration shall not deprive the Director of jurisdiction to proceed with a disciplinary  
16 proceeding against an automotive repair dealer or to render a decision temporarily or permanently  
17 invalidating (suspending or revoking) a registration.

18 11. Bus. & Prof. Code section 9889.1 provides, in pertinent part, that the Director may  
19 suspend or revoke any license issued under Articles 5 and 6 (commencing with section 9887.1) of  
20 the Automotive Repair Act.

21 12. Bus. & Prof. Code section 9889.7 provides, in pertinent part, that the expiration or  
22 suspension of a license by operation of law or by order or decision of the Director or a court of  
23 law, or the voluntary surrender of a license shall not deprive the Director of jurisdiction to  
24 proceed with any disciplinary proceedings.

25  
26 <sup>1</sup> Effective August 1, 2012, California Code of Regulations, title 16, sections 3340.28,  
27 3340.29, and 3340.30 were amended to implement a license restructure from the Advanced  
28 Emission Specialist Technician (EA) license and Basic Area (EB) Technician license to Smog  
Check Inspector (EO) license and/or Smog Check Repair Technician (EI) license.

1 13. Health and Safety Code ("Health & Saf. Code") section 44002 provides, in pertinent  
2 part, that the Director has all the powers and authority granted under the Automotive Repair Act  
3 for enforcing the Motor Vehicle Inspection Program.

4 14. Health & Saf. Code section 44072.6 provides, in pertinent part, that the expiration or  
5 suspension of a license by operation of law, or by order or decision of the Director of Consumer  
6 Affairs, or a court of law, or the voluntary surrender of the license shall not deprive the Director  
7 of jurisdiction to proceed with disciplinary action.

8 15. Health & Saf. Code section 44072.8 states that when a license has been revoked or  
9 suspended following a hearing under this article, any additional license issued under this chapter  
10 in the name of the licensee may be likewise revoked or suspended by the director.

11 16. California Code of Regulations, title 16, section 3340.28, subdivision (e), states that  
12 "[u]pon renewal of an unexpired Basic Area Technician license or an Advanced Emission  
13 Specialist Technician license issued prior to the effective date of this regulation, the licensee may  
14 apply to renew as a Smog Check Inspector, Smog Check Repair Technician, or both.

15 **STATUTORY PROVISIONS**

16 17. Bus. & Prof. Code section 9884.7 states, in pertinent part:

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

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

23 . . . .

24 (4) Any other conduct that constitutes fraud.

25 . . . .

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

27 . . . .

28 (c) Notwithstanding subdivision (b), the director may suspend, revoke or

1 place on probation the registration for all places of business operated in this state by  
2 an automotive repair dealer upon a finding that the automotive repair dealer has, or is,  
3 engaged in a course of repeated and willful violations of this chapter, or regulations  
4 adopted pursuant to it.

5 18. Bus. & Prof. Code section 9884.8 states, in pertinent part, that “[a]ll work done by an  
6 automotive repair dealer, including all warranty work, shall be recorded on an invoice and shall  
7 describe all service work done and parts supplied . . . .”

8 19. Bus. & Prof. Code section 9884.9, subdivision (a), states, in pertinent part, that “[t]he  
9 automotive repair dealer shall give to the customer a written estimated price for labor and parts  
10 necessary for a specific job. No work shall be done and no charges shall accrue before  
11 authorization to proceed is obtained from the customer . . . .”

12 20. Bus. & Prof. Code section 9889.3 states, in pertinent part:

13 The director may suspend, revoke, or take other disciplinary action  
14 against a license as provided in this article [Article 7 (commencing with section  
15 9889.1) of the Automotive Repair Act] if the licensee or any partner, officer, or  
16 director thereof:

17 (a) Violates any section of the Business and Professions Code which  
18 relates to his or her licensed activities.

19 . . . .

20 (c) Violates any of the regulations promulgated by the director pursuant  
21 to this chapter.

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

24 . . . .

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

27 21. Bus. & Prof. Code section 9889.9 states that “[w]hen any license has been revoked or  
28 suspended following a hearing under the provisions of this article [Article 7 (commencing with  
section 9889.1) of the Automotive Repair Act], any additional license issued under Articles 5 and  
6 of this chapter in the name of the licensee may be likewise revoked or suspended by the  
director.”

22. Bus. & Prof. Code section 22, subdivision (a), states:

“Board” as used in any provision of this Code, refers to the board in

1 which the administration of the provision is vested, and unless otherwise expressly  
2 provided, shall include "bureau," "commission," "committee," "department,"  
3 "division," "examining committee," "program," and "agency."

4 23. Bus. & Prof. Code section 477, subdivision (b), states, in pertinent part, that a  
5 "license" includes "registration" and "certificate."

6 24. Health & Saf. Code section 44072.2 states, in pertinent part:

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

10 . . . .

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

### 13 COST RECOVERY

14 25. Bus. & Prof. Code section 125.3 provides, in pertinent part, that a Board may request  
15 the administrative law judge to direct a licentiate found to have committed a violation or  
16 violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation  
17 and enforcement of the case.

### 18 UNDERCOVER OPERATION #1: 2002 HONDA

19 26. On or about December 19, 2013, a representative of the Bureau, acting in an  
20 undercover capacity ("operator"), took the Bureau's 2002 Honda to Respondent Z & M's facility  
21 and requested smog, lamp and brake inspections on the vehicle. The right front and right rear  
22 brake rotors on the Bureau-documented vehicle were machined below the manufacturer's  
23 minimum thickness specifications, the right headlamp was out of adjustment, and the bulb in the  
24 right outer tail lamp was defective, preventing the lamp from functioning. Respondent Chopan  
25 ("Chopan") advised the operator that he was too busy to inspect the vehicle and requested that he  
26 return later.

27 27. At approximately 1128 hours that same day, the operator took the vehicle back to the  
28 facility and requested smog, brake and lamp inspections. At approximately 1145 hours, Chopan  
informed the operator that the vehicle had failed the smog inspection due to incomplete monitors.  
Chopan told the operator to drive the vehicle about 30 miles and return later to finish the

1 inspection. Chopan did not provide the operator with a written estimate or invoice (Chopan did  
2 not charge the operator for any services during the visit).

3 28. On or about December 23, 2013, the operator returned the vehicle to the facility for  
4 the inspections. Later, Chopan told the operator that the rear side brake light was not working.  
5 Chopan had the operator remove the inner tail light cover and inspect the bulb. Chopan  
6 confirmed that the bulb was in need of replacement. Chopan sold the operator a new bulb for \$2  
7 and assisted the operator in installing it on the vehicle. Chopan completed the lamp inspection.  
8 At approximately 1045 hours, Chopan informed the operator that the vehicle passed the brake,  
9 lamp and smog inspections. The operator paid Chopan a total of \$82 in cash and received copies  
10 of a vehicle inspection report for the smog inspection, an invoice, Certificate of Brake  
11 Adjustment [REDACTED], and Certificate of Lamp Adjustment [REDACTED]. The  
12 operator left the facility.

13 29. On or about December 30, 2013, the Bureau inspected the vehicle and found that the  
14 right headlamp had been adjusted and the bulb in the right outer tail lamp had been replaced. The  
15 Bureau also found that none of the wheels had been removed, indicating that the brake inspection  
16 had not been properly performed on the vehicle. Further, the right front and right rear brake  
17 rotors were not within manufacturer's specifications.

18 **FIRST CAUSE FOR DISCIPLINE**

19 **(Untrue or Misleading Statements)**

20 30. Respondent Z & M's registration is subject to disciplinary action pursuant to Bus. &  
21 Prof. Code section 9884.7, subdivision (a)(1), Respondent made or authorized a statement which  
22 it knew or in the exercise of reasonable care should have known to be untrue or misleading, as  
23 follows: Respondent Z & M's brake and lamp adjuster, Respondent Chopan, certified under  
24 penalty of perjury on Brake Certificate [REDACTED] that the drums and rotors on the  
25 Bureau's 2002 Honda were in a satisfactory condition. In fact, the right front and right rear disc  
26 brake rotors on the vehicle were machined below the manufacturer's minimum thickness  
27 specifications at the time the vehicle was taken to Respondent Z & M's facility.

28 ///

1 SECOND CAUSE FOR DISCIPLINE

2 (Fraud)

3 31. Respondent Z & M's registration is subject to disciplinary action pursuant to Bus. &  
4 Prof. Code section 9884.7, subdivision (a)(4), Respondent committed an act constituting fraud, as  
5 follows: Respondent Z & M obtained payment from the operator for performing the applicable  
6 inspections, adjustments, or repairs of the brake and lighting systems on the Bureau's 2002  
7 Honda as specified by the Bureau and in accordance with the Vehicle Code. In fact, Respondent  
8 Z & M's employee, Respondent Chopan, failed to perform the necessary inspections,  
9 adjustments, and repairs in compliance with Bureau Regulations or the Vehicle Code.

10 THIRD CAUSE FOR DISCIPLINE

11 (Failure to Comply with the Bus. & Prof. Code)

12 32. Respondent Z & M's registration is subject to disciplinary action pursuant to Bus. &  
13 Prof. Code section 9884.7, subdivision (a)(6), in that Respondent failed to comply with  
14 provisions of that Code in the following material respects:

15 a. Section 9884.8: On or about December 19, 2013, Respondent Z & M failed to ensure  
16 that the operator was provided with an invoice for the smog inspection on the Bureau's 2002  
17 Honda.

18 b. Section 9884.9, subdivision (a): Respondent Z & M failed to ensure that the  
19 operator was provided with a written estimate for the smog, brake and lamp inspections on the  
20 Bureau's 2002 Honda.

21 FOURTH CAUSE FOR DISCIPLINE

22 (Violations of Regulations)

23 33. Respondent Z & M's registration is subject to disciplinary action pursuant to Bus. &  
24 Prof. Code section 9884.7, subdivision (a)(6), in that Respondent failed to comply with  
25 provisions of California Code of Regulations, title 16, in the following material respects:

26 a. Section 3305, subdivision (a): Respondent Z & M's brake and lamp adjuster,  
27 Respondent Chopan, failed to perform the inspection of the brake system on the Bureau's 2002

28 ///

1 Honda in accordance with the specifications, instructions, and directives issued by the Bureau and  
2 the vehicle manufacturer.

3 b. **Section 3321, subdivision (c)(2)**: Respondent Z & M issued Brake Certificate No.  
4 [REDACTED] as to the Bureau's 2002 Honda when the brake system on the vehicle had not been  
5 completely tested or inspected.

6 **FIFTH CAUSE FOR DISCIPLINE**

7 **(Failure to Comply with the Bus. & Prof. Code)**

8 34. Respondent Z & M's brake and lamp station licenses are subject to disciplinary action  
9 pursuant to Bus. & Prof. Code section 9889.3, subdivisions (a) and (h), in that Respondent  
10 violated Bus. & Prof. Code sections 9884.8 and 9884.9, subdivision (a), relating to its licensed  
11 activities, as set forth in 32 above.

12 **SIXTH CAUSE FOR DISCIPLINE**

13 **(Failure to Comply with Regulations)**

14 35. Respondent Z & M's brake station license is subject to disciplinary action pursuant to  
15 Bus. & Prof. Code section 9889.3, subdivision (c), in that Respondent failed to comply with the  
16 provisions of California Code of Regulations, title 16, sections 3305, subdivision (a), and 3321,  
17 subdivision (c)(2), as set forth in paragraph 33 above.

18 **SEVENTH CAUSE FOR DISCIPLINE**

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

20 36. Respondent Z & M's brake and lamp station licenses are subject to disciplinary action  
21 pursuant to Bus. & Prof. Code section 9889.3, subdivision (d), in that Respondent committed an  
22 act involving dishonesty, fraud, or deceit whereby another was injured, as set forth in paragraph  
23 31 above.

24 **EIGHTH CAUSE FOR DISCIPLINE**

25 **(Violations of Regulations)**

26 37. Respondent Chopan's brake adjuster license is subject to disciplinary action pursuant  
27 to Bus. & Prof. Code section 9889.3, subdivision (c), in that he failed to comply with provisions

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1 of California Code of Regulations, title 16, sections 3305, subdivision (a), and 3321, subdivision  
2 (c)(2), as set forth in paragraph 33 above.

3 **NINTH CAUSE FOR DISCIPLINE**

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

5 38. Respondent Chopan's brake adjuster license is subject to disciplinary action pursuant  
6 to Bus. & Prof. Code section 9889.3, subdivision (d), in that Respondent committed an act  
7 involving dishonesty, fraud, or deceit whereby another was injured, as set forth in paragraph 31  
8 above.

9 **UNDERCOVER OPERATION #2: 2007 NISSAN**

10 39. On or about January 23, 2014, the undercover operator ("operator") took the Bureau's  
11 2007 Nissan to Respondent Z & M's facility. The right front and left rear brake rotors on the  
12 Bureau-documented vehicle were machined below the manufacturer's minimum thickness  
13 specifications, the right headlamp was out of adjustment, and the bulbs in both reverse lamps  
14 were defective, preventing the lamps from functioning. At approximately 1045 hours, the  
15 operator met with Chopan and requested smog, brake and lamp inspections on the vehicle. At  
16 approximately 1101 hours, Chopan informed the operator that the back-up lights were not  
17 working. Chopan told the operator to have the back-up lights repaired and to return for a re-  
18 inspection. The operator paid Chopan \$80 in cash for the inspections, but was not given an  
19 invoice at that time or a written estimate. The operator left the facility. Later, the Bureau  
20 replaced the bulbs in the reverse lamps.

21 40. At approximately 1238 hours, the operator returned the vehicle to the facility. At  
22 approximately 1257 hours, the operator was advised that the vehicle passed the brake, lamp and  
23 smog inspections. The operator received an invoice, a vehicle inspection report for the smog  
24 inspection, Certificate of Brake Adjustment [REDACTED] and Certificate of Lamp Adjustment  
25 [REDACTED]. The operator left the facility.

26 41. On or about January 23, 2014, the Bureau inspected the vehicle and found that the  
27 right headlamp had been adjusted and the reverse lamps were functioning normally. The Bureau  
28 also found that none of the wheels had been removed, indicating that the brake inspection had not

1 been properly performed on the vehicle. Further, the right front and left rear brake rotors were  
2 not within manufacturer's specifications.

3 **TENTH CAUSE FOR DISCIPLINE**

4 **(Untrue or Misleading Statements)**

5 42. Respondent Z & M's registration is subject to disciplinary action pursuant to Bus. &  
6 Prof. Code section 9884.7, subdivision (a)(1), Respondent made or authorized a statement which  
7 it knew or in the exercise of reasonable care should have known to be untrue or misleading, as  
8 follows: Respondent Z & M's brake and lamp adjuster, Respondent Chopan, certified under  
9 penalty of perjury on Brake Certificate [REDACTED] that the drums and rotors on the  
10 Bureau's 2007 Nissan were in a satisfactory condition. In fact, the right front and left rear brake  
11 rotors on the vehicle were machined below the manufacturer's minimum thickness specifications  
12 at the time the vehicle was taken to Respondent Z & M's facility.

13 **ELEVENTH CAUSE FOR DISCIPLINE**

14 **(Fraud)**

15 43. Respondent Z & M's registration is subject to disciplinary action pursuant to Bus. &  
16 Prof. Code section 9884.7, subdivision (a)(4), Respondent committed an act constituting fraud, as  
17 follows: Respondent Z & M obtained payment from the operator for performing the applicable  
18 inspections, adjustments, or repairs of the brake and lighting systems on the Bureau's 2007  
19 Nissan as specified by the Bureau and in accordance with the Vehicle Code. In fact, Respondent  
20 Z & M's employee, Respondent Chopan, failed to perform the necessary inspections,  
21 adjustments, and repairs in compliance with Bureau Regulations or the Vehicle Code.

22 **TWELFTH CAUSE FOR DISCIPLINE**

23 **(Failure to Comply with the Bus. & Prof. Code)**

24 44. Respondent Z & M's registration is subject to disciplinary action pursuant to Bus. &  
25 Prof. Code section 9884.7, subdivision (a)(6), in that Respondent failed to comply with section  
26 9884.9, subdivision (a), of that Code in a material respect, as follows: Respondent Z & M failed  
27 to ensure that the operator was provided with a written estimate for the smog, brake and lamp  
28 inspections on the Bureau's 2007 Nissan.

1 **THIRTEENTH CAUSE FOR DISCIPLINE**

2 **(Violations of Regulations)**

3 45. Respondent Z & M's registration is subject to disciplinary action pursuant to Bus. &  
4 Prof. Code section 9884.7, subdivision (a)(6), in that Respondent failed to comply with  
5 provisions of California Code of Regulations, title 16, in the following material respects:

6 a. **Section 3305, subdivision (a)**: Respondent Z & M's brake and lamp adjuster,  
7 Respondent Chopan, failed to perform the inspection of the brake system on the Bureau's 2007  
8 Nissan in accordance with the specifications, instructions, and directives issued by the Bureau and  
9 the vehicle manufacturer.

10 b. **Section 3321, subdivision (c)(2)**: Respondent Z & M issued Brake Certificate No.  
11 [REDACTED] as to the Bureau's 2007 Nissan when the brake system on the vehicle had not been  
12 completely tested or inspected.

13 **FOURTEENTH CAUSE FOR DISCIPLINE**

14 **(Failure to Comply with the Bus. & Prof. Code)**

15 46. Respondent Z & M's brake and lamp station licenses are subject to disciplinary action  
16 pursuant to Bus. & Prof. Code section 9889.3, subdivisions (a) and (h), in that Respondent  
17 violated Bus. & Prof. Code section 9884.9, subdivision (a), relating to its licensed activities, as set  
18 forth in 44 above.

19 **FIFTEENTH CAUSE FOR DISCIPLINE**

20 **(Failure to Comply with Regulations)**

21 47. Respondent Z & M's brake station license is subject to disciplinary action pursuant to  
22 Bus. & Prof. Code section 9889.3, subdivision (c), in that Respondent failed to comply with the  
23 provisions of California Code of Regulations, title 16, sections 3305, subdivision (a), and 3321,  
24 subdivision (c)(2), as set forth in paragraph 45 above.

25 **SIXTEENTH CAUSE FOR DISCIPLINE**

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

27 48. Respondent Z & M's brake and lamp station licenses are subject to disciplinary action  
28 pursuant to Bus. & Prof. Code section 9889.3, subdivision (d), in that Respondent committed an

1 act involving dishonesty, fraud, or deceit whereby another was injured, as set forth in paragraph  
2 43 above.

3 **SEVENTEENTH CAUSE FOR DISCIPLINE**

4 **(Violations of Regulations)**

5 49. Respondent Chopan's brake adjuster license is subject to disciplinary action pursuant  
6 to Bus. & Prof. Code section 9889.3, subdivision (c), in that he failed to comply with provisions  
7 of California Code of Regulations, title 16, sections 3305, subdivision (a), and 3321, subdivision  
8 (c)(2), as set forth in paragraph 45 above.

9 **EIGHTEENTH CAUSE FOR DISCIPLINE**

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

11 50. Respondent Chopan's brake adjuster license is subject to disciplinary action pursuant  
12 to Bus. & Prof. Code section 9889.3, subdivision (d), in that Respondent committed an act  
13 involving dishonesty, fraud, or deceit whereby another was injured, as set forth in paragraph 43  
14 above.

15 **UNDERCOVER OPERATION #3: 2001 MITSUBISHI**

16 51. On or about February 3, 2014, the undercover operator ("operator") took the Bureau's  
17 2001 Mitsubishi to Respondent Z & M's facility and requested smog, brake, and lamp inspections  
18 on the vehicle. The right front and left rear brake rotors on the Bureau-documented vehicle were  
19 machined below the manufacturer's minimum thickness specifications and both headlamps were  
20 out of adjustment. Chopan did not provide the operator with a written estimate. At  
21 approximately 1020 hours, Chopan informed the operator that the vehicle passed the brake, lamp  
22 and smog inspections. The operator paid Chopan \$80 in cash for the inspections and received an  
23 invoice, a vehicle inspection report for the smog inspection, Certificate of Brake Adjustment No.  
24 [REDACTED], and Certificate of Lamp Adjustment [REDACTED]. The operator left the  
25 facility.

26 52. On or about February 5, 2014, the Bureau inspected the vehicle and found that the  
27 right headlamp had been adjusted within specifications, but that the left headlamp was out of  
28 adjustment. The Bureau also found that none of the wheels had been removed, indicating that the

1 brake inspection had not been properly performed on the vehicle, the right front and left rear  
2 brake rotors were not within manufacturer's specifications,

3 **NINETEENTH CAUSE FOR DISCIPLINE**

4 **(Untrue or Misleading Statements)**

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

9 a. Respondent Z & M's brake and lamp adjuster, Respondent Chopan, certified under  
10 penalty of perjury on Brake Certificate [REDACTED] that the drums and rotors on the  
11 Bureau's 2001 Mitsubishi were in a satisfactory condition. In fact, the right front and left rear  
12 brake rotors on the vehicle were machined below the manufacturer's minimum thickness  
13 specifications at the time the vehicle was taken to Respondent Z & M's facility.

14 b. Respondent Z & M's brake and lamp adjuster, Respondent Chopan, certified under  
15 penalty of perjury on Lamp Certificate [REDACTED] that the applicable adjustment had been  
16 performed on the lighting system on the Bureau's 2001 Mitsubishi. In fact, the left headlamp was  
17 out of adjustment.

18 **TWENTIETH CAUSE FOR DISCIPLINE**

19 **(Fraud)**

20 54. Respondent Z & M's registration is subject to disciplinary action pursuant to Bus. &  
21 Prof. Code section 9884.7, subdivision (a)(4), Respondent committed an act constituting fraud, as  
22 follows: Respondent Z & M obtained payment from the operator for performing the applicable  
23 inspections, adjustments, or repairs of the brake and lighting systems on the Bureau's 2001  
24 Mitsubishi as specified by the Bureau and in accordance with the Vehicle Code. In fact,  
25 Respondent Z & M's employee, Respondent Chopan, failed to perform the necessary inspections,  
26 adjustments, and repairs in compliance with Bureau Regulations or the Vehicle Code.

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1 **TWENTY-FIRST CAUSE FOR DISCIPLINE**

2 **(Failure to Comply with the Bus. & Prof. Code)**

3 55. Respondent Z & M's registration is subject to disciplinary action pursuant to Bus. &  
4 Prof. Code section 9884.7, subdivision (a)(6), in that Respondent failed to comply with section  
5 9884.9, subdivision (a), of that Code in a material respect, as follows: Respondent Z & M failed  
6 to ensure that the operator was provided with a written estimate for the smog, brake and lamp  
7 inspections on the Bureau's 2001 Mitsubishi.

8 **TWENTY-SECOND CAUSE FOR DISCIPLINE**

9 **(Violations of Regulations)**

10 56. Respondent Z & M's registration is subject to disciplinary action pursuant to Bus. &  
11 Prof. Code section 9884.7, subdivision (a)(6), in that Respondent failed to comply with  
12 provisions of California Code of Regulations, title 16, in the following material respects:

13 a. **Section 3305, subdivision (a):** Respondent Z & M's brake and lamp adjuster,  
14 Respondent Chopan, failed to perform the inspection of the brake system and inspection and  
15 adjustment of the lighting system on the Bureau's 2001 Mitsubishi in accordance with the  
16 specifications, instructions, and directives issued by the Bureau and the vehicle manufacturer.

17 b. **Section 3316, subdivision (d)(2):** Respondent Z & M issued Lamp Certificate No.  
18 [REDACTED] as to the Bureau's 2001 Mitsubishi when all of the lamps, lighting equipment, and/or  
19 related electrical systems on the vehicle were not in compliance with Bureau regulations.

20 c. **Section 3321, subdivision (c)(2):** Respondent Z & M issued Brake Certificate No.  
21 [REDACTED] as to the Bureau's 2001 Mitsubishi when the brake system on the vehicle had not  
22 been completely tested or inspected.

23 **TWENTY-THIRD CAUSE FOR DISCIPLINE**

24 **(Failure to Comply with the Bus. & Prof. Code)**

25 57. Respondent Z & M's brake and lamp station licenses are subject to disciplinary action  
26 pursuant to Bus. & Prof. Code section 9889.3, subdivisions (a) and (h), in that Respondent  
27 violated Bus. & Prof. Code section 9884.9, subdivision (a), relating to its licensed activities, as set  
28 forth in 55 above.

1 **TWENTY-FOURTH CAUSE FOR DISCIPLINE**

2 **(Failure to Comply with Regulations)**

3 58. Respondent Z & M's brake and lamp station licenses are subject to disciplinary action  
4 pursuant to Bus. & Prof. Code section 9889.3, subdivision (c), in that Respondent failed to  
5 comply with the provisions of California Code of Regulations, title 16, sections 3305, subdivision  
6 (a), 3316, subdivision (d)(2), and 3321, subdivision (c)(2), as set forth in paragraph 56 above.

7 **TWENTY-FIFTH CAUSE FOR DISCIPLINE**

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

9 59. Respondent Z & M's brake and lamp station licenses are subject to disciplinary action  
10 pursuant to Bus. & Prof. Code section 9889.3, subdivision (d), in that Respondent committed an  
11 act involving dishonesty, fraud, or deceit whereby another was injured, as set forth in paragraph  
12 54 above.

13 **TWENTY-SIXTH CAUSE FOR DISCIPLINE**

14 **(Violations of Regulations)**

15 60. Respondent Chopan's brake and lamp adjuster licenses are subject to disciplinary  
16 action pursuant to Bus. & Prof. Code section 9889.3, subdivision (c), in that he failed to comply  
17 with provisions of California Code of Regulations, title 16, sections 3305, subdivision (a), 3316,  
18 subdivision (d)(2), and 3321, subdivision (c)(2), as set forth in paragraph 56 above.

19 **TWENTY-SEVENTH CAUSE FOR DISCIPLINE**

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

21 61. Respondent Chopan's brake and lamp adjuster licenses are subject to disciplinary  
22 action pursuant to Bus. & Prof. Code section 9889.3, subdivision (d), in that Respondent  
23 committed an act involving dishonesty, fraud, or deceit whereby another was injured, as set forth  
24 in paragraph 54 above.

25 **TWENTY-EIGHTH CAUSE FOR DISCIPLINE**

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

27 62. Respondent Z & M's smog check station license is subject to disciplinary action  
28 pursuant to Health & Saf. Code section 44072.2, subdivision (d), in that Respondent committed

1 dishonest, fraudulent, or deceitful acts whereby another is injured, as set forth in paragraphs 31,  
2 43, and 54 above.

3 **TWENTY-NINTH CAUSE FOR DISCIPLINE**

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

5 63. Respondent Chopan's technician licenses are subject to disciplinary action pursuant  
6 to Health & Saf. Code section 44072.2, subdivision (d), in that Respondent committed  
7 dishonest, fraudulent, or deceitful acts whereby another is injured, as set forth in paragraphs 31,  
8 43, and 54 above.

9 **OTHER MATTERS**

10 64. Pursuant to Bus. & Prof. Code section 9884.7, subdivision (c), the Director may  
11 suspend, revoke or place on probation the registration for all places of business operated in this  
12 state by Respondent Z & M Smog & Repair upon a finding that Respondent has, or is, engaged in  
13 a course of repeated and willful violations of the laws and regulations pertaining to an automotive  
14 repair dealer.

15 65. Pursuant to Health & Saf. Code section 44072.8, if Smog Check Station License  
16 Number RC 216481, issued to Respondent Z & M Smog & Repair is revoked or suspended, any  
17 additional license issued under Chapter 5 of the Health & Saf. Code in the name of said licensee  
18 may be likewise revoked or suspended by the Director.

19 66. Pursuant to Bus. & Prof. Code section 9889.9, if Lamp Station License Number  
20 LS 216481, issued to Respondent Z & M Smog & Repair, is revoked or suspended, any  
21 additional license issued under Articles 5 and 6 of Chapter 20.3 of the Bus. & Prof. Code in the  
22 name of said licensee may be likewise revoked or suspended by the Director.

23 67. Pursuant to Bus. & Prof. Code section 9889.9, if Brake Station License Number  
24 BS 216481, issued to Respondent Z & M Smog & Repair, is revoked or suspended, any  
25 additional license issued under Articles 5 and 6 of Chapter 20.3 of the Bus. & Prof. Code in the  
26 name of said licensee may be likewise revoked or suspended by the Director.

27 68. Pursuant to Health & Saf. Code section 44072.8, if Smog Check Inspector License  
28 Number EO 132232 and Smog Check Repair Technician License No. EI 132232, issued to

1 Respondent Ahmad Zia Chopan, are revoked or suspended, any additional license issued under  
2 this chapter in the name of said licensee may be likewise revoked or suspended by the Director.

3 69. Pursuant to Bus. & Prof. Code section 9889.9, if Brake Adjuster License Number  
4 BA 132232, issued to Respondent Ahmad Zia Chopan, is revoked or suspended, any additional  
5 license issued under Articles 5 and 6 of Chapter 20.3 of the Bus. & Prof. Code in the name of said  
6 licensee may be likewise revoked or suspended by the Director.

7 70. Pursuant to Bus. & Prof. Code section 9889.9, if Lamp Adjuster License Number  
8 LA 132232, issued to Respondent Ahmad Zia Chopan, is revoked or suspended, any additional  
9 license issued under Articles 5 and 6 of Chapter 20.3 of the Bus. & Prof. Code in the name of said  
10 licensee may be likewise revoked or suspended by the Director.

11 **PRAYER**

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

14 1. Revoking or suspending Automotive Repair Dealer Registration Number ARD  
15 216481, issued to Z & M Smog & Repair;

16 2. Revoking or suspending any other automotive repair dealer registration issued to Z &  
17 M Smog & Repair;

18 3. Revoking or suspending Smog Check Station License Number RC 216481, issued to  
19 Z & M Smog & Repair;

20 4. Revoking or suspending any additional license issued under Chapter 5 of the Health  
21 and Safety Code in the name of Z & M Smog & Repair;

22 5. Revoking or suspending Lamp Station License Number LS 216481, issued to Z & M  
23 Smog & Repair;

24 6. Revoking or suspending Brake Station License Number BS 216481, issued to Z & M  
25 Smog & Repair;

26 7. Revoking or suspending any additional license issued under Articles 5 and 6 of  
27 Chapter 20.3 of the Business and Professions Code in the name of Z & M Smog & Repair;

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1 8. Revoking or suspending Smog Check Inspector License Number EO 132232 and  
2 Smog Check Repair Technician License No. EI 132232, issued to Ahmad Zia Chopan;

3 9. Revoking or suspending any additional license issued under Chapter 5 of the Health  
4 and Safety Code in the name of Ahmad Zia Chopan;

5 10. Revoking or suspending Brake Adjuster License Number BA 132232, issued to  
6 Ahmad Zia Chopan;

7 11. Revoking or suspending Lamp Adjuster License Number LA 132232, issued to  
8 Ahmad Zia Chopan;

9 12. Revoking or suspending any additional license issued under Articles 5 and 6 of  
10 Chapter 20.3 of the Business and Professions Code in the name of Ahmad Zia Chopan;

11 13. Ordering Z & M Smog & Repair and Ahmad Zia Chopan to pay the Director of  
12 Consumer Affairs the reasonable costs of the investigation and enforcement of this case, pursuant  
13 to Business and Professions Code section 125.3;

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

15  
16 DATED:

*December 22, 2014*

*Patrick Dorais*

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

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