

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

In the Matter of the Accusation Against:

Case No.: 79/17-4316

**PAUL GONZAGA DELVILLAR, Owner  
dba, CRESTLINE SMOG**

OAH No.: 2018060654

23471 Crestforest Drive, Suite A  
Crestline, CA 92325

PO Box 3911 (Mailing)  
Crestline, CA 92325

Automotive Repair Dealer Registration No.:  
ARD 283822  
Smog Check Station License No.: TC 283822

and

**PAUL GONZAGA DELVILLAR**  
PO Box 3911  
Crestline, CA 92325

Smog Check Inspector License No.: EO  
639677

and

**DANNY PAUL DUYAN aka DANNY  
PAUL KJELLESVIG**  
50300 Ramona Street  
Cabazon, CA 92230

PO Box 103 (Mailing)  
Cabazon, CA 92230

Smog Check Inspector License No.: EO  
636954

Respondents.

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**DECISION**

The attached Proposed Decision of the Administrative Law Judge AS TO RESPONDENT DANNY PAUL DUYAN aka DANNY PAUL KJELLESVIG, ONLY is hereby accepted and adopted by the Director of the Department of Consumer Affairs as the Decision in the above-entitled matter.

This Decision shall become effective at 5:00 p.m. on Feb. 25, 2019.

DATED: Jan. 17, 2019

  
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GRACE ARUPO RODRIGUEZ  
Assistant Deputy Director  
Legal Affairs Division  
Department of Consumer Affairs

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

In the Matter of the Accusation Against:

**PAUL GONZAGA DELVILLAR,  
OWNER, DBA CRESTLINE SMOG,**

Automotive Repair Dealer Registration No.  
ARD 283822,  
Smog Check, Test Only, Station License No.  
TC 283822;

**PAUL GONZAGA DELVILLAR,**

Smog Check Inspector License No. EO 639677;

**and**

**DANNY PAUL DUYAN aka DANNY PAUL  
KJELLESVIG,**

Smog Check Inspector License No. EO 636954,

Respondents.

Case No. 79/17-4316

OAH No. 2018060654

**PROPOSED DECISION**

This matter was heard before Administrative Law Judge Glynda B. Gomez, Office of Administrative Hearings (OAH), State of California, on November 8, 2018, in Los Angeles, California.

Deputy Attorney General Stephen D. Svetich represented Complainant.

Respondent Danny Paul Duyan aka Danny Paul Kjellesvig appeared and represented himself. Respondent Paul Gonzaga DelVillar, individually and doing business as Crestline Smog did not request a hearing and is the subject of an agency default proceeding. At hearing, Complainant proceeded on this matter solely on the allegations related to

Respondent Danny Paul Duyan aka Danny Paul Kjellesvig (hereinafter Respondent or Respondent Duyan) contained in the ninth, tenth and eleventh causes for discipline.

Evidence was received, the record was closed, and the matter was submitted for decision on November 8, 2018.

## FACTUAL FINDINGS

### *Jurisdiction*

1. On April 27, 2018, Complainant filed and served an Accusation in his official capacity requesting that the Bureau of Automotive Repair (BAR) suspend or revoke Respondent's Smog Check Inspector license and revoke any other licenses issued to Respondent by the BAR and order him to pay costs.<sup>1</sup> Respondent submitted a timely Notice of Defense.

2. On August 7, 2018, Complainant served the required Notice of Hearing on Respondent by mailing it to the address listed on his Notice of Defense and the Respondent's address of record on file with the BAR.

### *License History*

3. On June 4, 2014, the Bureau issued a Smog Check Inspector License No. EO 636954 to Respondent. The license will expire on June 30, 2020, unless revoked or renewed.

4. At all times relevant herein, Respondent worked as a Smog Check Inspector at Crestline Smog which was operated by Paul Gonzaga DelVillar under Smog Check, Test Only Station License No. TC283822 and Automotive Repair Dealer Registration No. ARD 283822. Mr. DelVillar became licensed as a Smog Inspector holding license No. EO639677 on September 14, 2016.<sup>2</sup>

### *Smog Check Program*

5. California's smog check program is designed to improve air quality and to protect public health by reducing vehicle emissions. The program requires most vehicle owners in designated "Enhanced" and "Basic" areas to present their vehicles for smog check inspections every two years upon vehicle registration renewal and whenever vehicle title is transferred. The smog inspections are performed by Smog Check inspectors at Smog Check Stations. The inspectors and the stations are licensed by the BAR.

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<sup>1</sup> The remaining respondents did not request a hearing and an agency default was processed against them.

<sup>2</sup> Mr. DelVillar's licenses are currently subject to an agency default proceeding.

## *BAR-97*

6. The Smog Check inspection in certain Enhanced areas of the state is an Acceleration Simulation Mode (ASM) test performed using an Emission Inspection System (EIS), also known as a BAR97. This is a computer based five-gas analyzer that measures Hydrocarbons (HC), Carbon Monoxide (CO), Oxides of Nitrogen (NO<sub>x</sub>), Carbon Dioxide (CO<sub>2</sub>), and Oxygen (O<sub>2</sub>). The first part of the test is a loaded mode test of the vehicle's tailpipe emissions on a dynamometer. This puts the vehicle's drive wheels on rollers and the vehicle is driven at speeds of fifteen and twenty-five miles per hour to simulate driving conditions while the emissions are sampled by the EIS.

7. In Basic areas, or depending on a vehicle's configuration (all wheel drive, traction control issue), a similar test called a Two Speed Idle (TSI) test is performed, but instead of applying a load to the vehicle's drive wheels with a dynamometer, the EIS measures the emissions at idle as well as 2500 revolutions per minute (RPM).

8. The inspector also performs visual and functional tests as outlined in the Smog Check Manual. The visual inspection of the emission control components verifies the required emission control devices are present and properly connected. Functional tests are also performed which, depending on the vehicle, may include checking the ignition timing, malfunction indicator light (MIL), Exhaust Gas Recirculation (EGR) system, a low pressure test of the evaporative emissions controls (LPFET), a visible smoke test, and a pressure test of the gas cap.

9. An On-Board Diagnostics (OBDII) functional test is also performed on most 1996 to 1999 model year vehicles. The inspector is required to connect a test cable from the EIS to a Diagnostic Link Connector (DLC) which is located in the vehicle's passenger compartment. Through the DLC, the EIS retrieves the information from the vehicle's on-board computer about its ability to communicate, the status of the I/M readiness monitors and the MIL light command, as well as diagnostic trouble codes (DTC). The I/M readiness monitors tell whether or not the OBDII system has run a sufficient number of self-tests on the vehicle's emission and engine control systems. A failure of one or more of the OBDII functional criteria, depending on model year, will result in the vehicle failing its Smog Check inspection. In addition to reporting the outcome of the OBDII functional test, the Smog Check inspection results also show DTCs if there are any in the vehicle's on-board computer memory.

10. The inspector enters the results of the visual and functional inspections in the EIS. The EIS unit makes the determination whether or not the vehicle passes the inspection based on the results of the tailpipe, visual and functional tests.

11. The EIS is connected by telephone modem to BAR's Vehicle Information Database (VID), which is maintained by a state contractor. If the vehicle passes the visual, functional and tailpipe tests, it passes the overall inspection and a Certificate of Compliance is issued and transmitted electronically to the VID. Additionally, all data gathered during a

Smog Check inspection, regardless of the type of inspection, is transmitted to and retained in the VID.

#### *BAR-OIS*

12. On March 9, 2015, the BAR implemented a statewide regulatory change requiring the use of an On-Board Diagnostics Inspection System (BAR-OIS) in the testing of 2000 model year and newer gas-powered vehicles 14,000 Gross Vehicle Weight Rating (GVW) and under, and 1998 and newer diesel-powered vehicles 14,000 GVW and under. The system consists of a certified Data Acquisition Device (DAD), computer, bar code scanner, and printer. The DAD is an On Board Diagnostic (OBD) scan tool that, when requested by the BAR-OIS software, retrieves OBD data from the vehicle. Sensitive data, such as vehicle location (GPS) and accident-related information (air bag deployment), is not retrieved. The DAD connects between the BAR-OIS computer and the vehicle's DLC. The DAD is the only BAR-certified component of the BAR-OIS. The BAR-OIS requires a continuous internet connection when performing a Smog Check inspection. The BAR-OIS uses the software to communicate with the VID through the internet connection.

13. All OBD data that the vehicle indicates it supports is requested by the BAR-OIS. Bureau Test Data lists differences in Vehicle Identification Numbers (VIN) for vehicles that have received smog inspections, in addition to communication protocol (the language used to communicate) and Parameter ID (PID) differences with vehicles that have been certified correctly that are the same make and model vehicles.

14. The bar code scanner is used to input inspector information, the vehicle identification number (VIN), and Department of Motor Vehicles (DMV) renewal information. The printer provides a Vehicle Inspection Report (VIR) containing inspection results for motorists and a Smog Check Certificate of Compliance number for passing vehicles.

15. Data retrieved, captured and recorded to the VID during the BAR-OIS Smog Check inspection includes: the electronic vehicle identification number (eVIN), which is the digitally stored VIN programmed into the vehicle's Powertrain Control Module (PCM); the communication protocol, which is the specific "language" the PCM uses to relay or communicate information to scan tools and other computers or devices such as the BAR-OIS; and the number of Parameter Identification Data points (PIDs), which is the number of specific data values each PCM reports related to emissions controls. PIDS are data points reported by the vehicle's on-board computer to a scan tool or BAR-OIS. Examples of PIDs are engine speed, vehicle speed, engine temperature, and other input and output values utilized by the vehicle's on-board computer. The PID count is the number of data points reported by the vehicle's on-board computer and is programmed during manufacture.

16. The eVIN is required to be programmed into the vehicle's PCM on 2005 and newer vehicles, and on many occasions was programmed into the on board computers on earlier model year vehicles.

17. The communication protocol is programmed into the vehicle's on-board computer during the manufacture and does not change. The protocol can be recorded in these basic characters or in an expanded form that includes additional characters. The basic form is primary and is always contained with the expanded form (i.e. ICAN11bt5 vs. ICAN11bt500, 1914 vs. 19140808, JVPW vs. JVPW1850, JPWM vs. JPWM1850).

18. As with the EIS, inspectors also perform a visual and functional test on the vehicle. The visual inspection of the emission control components verifies the required emission control devices are present and properly connected, and a functional test is performed of the MIL. The BAR-OIS software makes the determination whether or not the vehicle passes the inspection based on the results of the OBD, visual and functional tests.

19. The EIS or BAR-OIS, depending on the test type, prints a VIR, which is a physical record of the test results and shows the Certificate of Compliance number that was issued if the vehicle passed the Smog Check inspection. The Smog Check inspector must sign the VIR to indicate that the inspection was performed within BAR guidelines. Licensed Smog Check Inspectors are the only persons authorized by the BAR to perform official inspections. They are issued a license and a personal access code, which are used to gain access to the EIS and used to set up a username and password within the BAR-OIS to perform smog check inspections. Unauthorized use of another inspector's license, access code, or username and password is prohibited.

20. The VID contains registration data from the DMV plus emission standards, vehicle Smog Check inspection, smog check stations and inspectors, and Certificates of Compliance. The VID has an internal clock that is set to Pacific Standard Time and records the time and date for each inspection. Each Certificate of Compliance has a unique control number so that it can be tracked to determine which Smog Check Station purchased the Certificate of Compliance and to which vehicle it was issued. The VID receives the Smog Check results immediately following the inspection. BAR can access the VID to view test data on Smog Check inspections performed at any Smog Check Station, or search for, retrieve, and print a test record for a particular vehicle which has been tested. If a vehicle passes the Smog Inspection, the vehicle information and test results are electronically transmitted to the Department of Motor Vehicles.

21. On March 14, 2017, Alfred Denno, Program Representative II, an employee of the BAR, conducted a review of the activities of the BAR's Riverside and San Bernardino County licensees. During the review, Mr. Denno discovered irregularities in the VID data pertaining to Crestline Smog owned by Paul Gonzaga DelVillar. Mr. Denno then initiated an investigation in which he reviewed OIS test data for Crestline Smog. Representative Denno's investigation revealed that the data related to certain vehicles certified by Crestline Smog contained a pattern of unmistakable discrepancies between the information transmitted during the inspections and documented information known about the subject vehicles. Only four of the eleven vehicles which were subject of Mr. Denno's investigation and the Accusation filed in this case are at issue at this time. Specifically, the four vehicles which were issued Certificates of Compliance using the identification and password of Respondent

Duyan are at issue. Representative Denno compared the data received from the certified vehicles to data from vehicles of the same year, make, and model and determined that the data from the four vehicles certified using Respondent Duyan's credentials contained discrepancies including incorrect vehicle communication protocols and incorrect PID counts. These documented discrepancies confirmed that the vehicles receiving smog certificates were fraudulently tested during the smog inspection using the "clean plugging" method.

22. "Clean plugging" is a method by which another vehicle's properly functioning OBDII system, or another source such as a simulator, is used to generate passing data readings or diagnostic information for the purpose of fraudulently issuing Certificates of Compliance to vehicles that are not in smog compliance or not present for testing.

23. The data analysis conducted by Representative Denno on the data derived from Crestline Smog's records between August 30, 2016 and September 28, 2016 demonstrated a scheme, pattern and practice of performing at least four fraudulent smog inspections using the credentials of Respondent Duyan and resulting in the issuance of four fraudulent electronic smog check certificates as follows:

Test Date	Vehicle Certified and Vin	Certificate No.	Technician License No.	OIS Test Data Details
8/30/2016	2002 Chevrolet K1500 Suburban  VIN NO.  1GNFK16T42J332023	ZF860048C	E0636954  (Respondent)	Comm. Protocol:  1914  (expected: JVPW)  PID Count: 17  (expected: 22)  No eVin Transmitted  (Correct eVin eExpected)
9/19/2016	2000 Isuzu Trooper  S/LS/Limited  VIN No.  JACDJ58X8Y7J16576	Z1784511C	E0635954  (Respondent)	Comm. Protocol:  1914  (expected: JVPW)  PID Count: 16



				(expected: 21)
9/27/2016	2001 Ford F150 <sup>3</sup>  VIN No.  1FTRX18L81KF60121  CA License Plate No. 6T56069	ZJ784520C	EO 636954  (Respondent)	Comm. Protocol:  1914  (expected JPWM)  PID Count: 16  (expected: 20)  No eVin  Transmitted  (Correct eVin Expected)
9/28/2016	2002 Ford Focus SVT <sup>4</sup>  VIN No.  3FAHP39572R191679	ZJ784524C	E0637920  (Respondent)	Comm. Protocol:  KWPF  (expected: JPWM)  PID Count: 42  (expected: 17 or 19)

<sup>3</sup> This specific 2001 Ford F150 bearing the same VIN Number and California License Plate Number underwent a smog check inspection at Crestline Smog on September 23, 2016, and failed due to incomplete readiness monitors. During that same Smog Check Inspection, the F150 transmitted the correct eVin, the correct communication protocol (JPWM), and the correct PID count (20), consistent with the OIS Test Data and Similar Vehicle OIS Test Data.

<sup>4</sup> This specific 2002 Ford Focus SVT bearing the same VIN Number underwent a smog check inspection at Crestline Smog's facility earlier in the day on September 28, 2016, and failed due to incomplete readiness monitors. During that Smog Check Inspection, the Focus transmitted the correct eVin, the correct communication protocol (JPWM), and the correct PID count (17), consistent with the OIS Test Data and similar vehicle OIS Test Data.

24. Mr. Denno is a licensed smog inspector and repair technician and has extensive experience in the automotive industry. Mr. Denno provided credible and knowledgeable testimony at the administrative hearing. Based upon his data analysis, Mr. Denno concluded that Respondent engaged in "clean plugging." Based upon the PID information and patterns, Mr. Denno opined that a simulator was used to test the above referenced vehicles and that the vehicles' emissions were not tested.

25. Complainant submitted as evidence of the costs of prosecution of this matter a Declaration of Stephen D. Svetich certifying that the Department of Justice, Office of the Attorney General, billed the BAR \$2,517.50 for legal services provided through October 15, 2018. Complainant also submitted a declaration of Mark Fernandez, a BAR employee, certifying that the BAR had incurred a total of \$2,007.11 in investigation costs related to the accusation. The evidence established that Complainant incurred total costs of \$4,524.61, all of which are deemed reasonable.

#### *Respondent's Evidence*

26. Respondent is an ex-convict who has served time in prison for an unspecified felony and for violation of his parole. Respondent has completed parole and wants to rebuild his life. His ability to work as a smog inspector is a cornerstone of his plan to move forward with his new life. Respondent was respectful of the proceeding and provided candid and credible testimony throughout the proceeding. During his testimony, Respondent disclosed that he has learning disabilities including an impaired memory. He also disclosed that he received special education services while in public school, but did not graduate. Respondent's wife Christina Duyan, testified at hearing and corroborated his testimony. According to Mrs. Duyan, she keeps track of all appointments, calendars and commitments for Respondent.

27. Respondent is married, the father of one young child and expecting a second child shortly. He is the sole support for his family. Respondent was encouraged by his stepfather, a BAR licensee, to obtain a smog inspector license. Respondent's stepfather assisted him with the financial aspects of obtaining appropriate classes. Respondent is extremely proud of his license and very grateful for the opportunity to work as a smog inspector, "have a second chance at leading an honest life" and a means to support his growing family. Mrs. Duyan testified that her husband "holds his license on a pedestal."

28. Respondent had worked as a smog inspector at a shop known as "Mario's." While working at Mario's, the owner encouraged him to leave his BAR identification and password in a small storage space in the shop because Respondent was prone to forgetting to bring his identification to work and had a hard time remembering his password. Respondent testified that he often had to call BAR to be reminded of his password. Respondent never experienced any problems as a result of leaving his credentials in the storage space. He and the owner of Mario's came in and left at the same time and Respondent did not believe anyone would disturb his things there or have access to them after hours. The owner of

Mario's planned to bring in family members to conduct the smog inspections. Respondent was happy when the owner introduced him to Paul Gonzaga DelVillar, who was opening his own Smog Check Station known as Crestline Smog and wanted to hire a smog inspector on a temporary basis until he obtained his own license.

29. While working at Crestline Smog, Respondent was instructed by Mr. DelVillar to leave his BAR identification badge and his password in the shop for safekeeping. Respondent understood that the instruction was based upon his having a poor memory and living a substantial distance from the shop making it difficult to return home for a forgotten identification card. Respondent did not think that anyone would use his credentials when he was not at the shop. However, he was surprised to find out that smog inspections had been conducted using his credentials on days that he was not at work including his regular Tuesday off day and on two days while he was away from work due to his son's medical issues.

30. When he received the Accusation, Respondent wrote a handwritten response in which he similarly denied conducting the subject smog inspections. In relevant part he wrote:

...I just received a letter of accusations from your office. [T]o be frank, I don't know what to say. [I]'m a little baffled and shocked of these accusations. I truly believe there has been a mistake. [H]onestly, what was going on with "[P]aul Gonzaga [D]evillar (sp)" in Crestline smog. I do not work there any further or have any idea of what is occurring with that shop or Paul. [I] was hired temporarily because [I] had a license and he was starting a new business. [I] did not work the 30<sup>th</sup> of Aug-2016, my "day off" on [S]ept 19, 2016, I called off my son was ill on the 27<sup>th</sup> and 28<sup>th</sup> of September. I was off work as well. [I] was requested to leave my license since [I] was coming to [C]restline from Cabazon. Mr. [D]evillar (sp) was friend of a friend and claimed he was helping me out. [I] see now he was using me. Please help me clear this up. [I] need my license to take care of family. [I] worked hard to get where [I]'m at. [H]onestly, [I] would never ever abuse my state smog license. My license is my second chance to make a honest life. [I]'m truly[sp] proud of what [I]'ve accomplished in receiving my license. [P]lease believe me. [I] aint like these dishonest people that abuse there [sp] license. [I]'m willing to help in any way [I] can.

(Exhibit 1.)

31. After learning of the allegations in the Accusation, Respondent no longer leaves his identification badge or password unattended. At hearing, he wore his identification card on a lariat around his neck. Respondent keeps his identification on his person or at home in a secure location at all times. He no longer trusts others' motives and realizes that he must safeguard his identification badge and password because to do otherwise risks his ability to support his family and his plan to move forward with his life.

Respondent admitted that leaving his credentials in the shops was a grave mistake and that he was naïve to believe that his employers would not abuse his trust.

32. Complainant proved, and Respondent admitted, that Respondent left his identification badge and password unattended and that Respondent's credentials were used to issue four fraudulent Certificates of Compliance. However, in light of Respondent's admissions, his credible testimony, and in the absence of any evidence to the contrary, the Complainant did not establish by a preponderance of the evidence that Respondent participated in the four fraudulent smog inspections or intentionally permitted his credentials to be used by anyone. Complainant did not establish by a preponderance of the evidence that Respondent engaged in the specifically alleged violations of the Motor Vehicle Inspection Program and its regulations or that Respondent engaged in dishonesty, fraud or deceit with respect to the four smog inspections which were performed by someone using his credentials without authorization on days that he was not present at Crestline. While Respondent admittedly displayed poor judgement, it did not rise to the level of dishonesty, fraud or deceit as alleged in the Accusation.

## LEGAL CONCLUSIONS

### *Causes for Discipline*

1. The first through eighth causes for discipline set forth in the Accusation do not pertain to Respondent and are therefore not addressed in this decision.

2. *Ninth Cause for Discipline (Violations of the Motor Vehicle Inspection Program):* Respondent's Smog Check Inspector License is not subject to discipline pursuant to Health and Safety Code section 44072.2, subdivision (a), in that it was not established by a preponderance of the evidence that Respondent failed to comply with section 44012 of the Health and Safety Code in a material respect by failing to perform the emission control tests on four vehicles in accordance with the procedures prescribed by the BAR. However, it was established by a preponderance of the evidence that Respondent failed to safeguard his badge and password and that this badge and password were used, without his consent, by someone else to commit the alleged acts in violation of the regulations. (Factual Findings 1-32.)

3. *Tenth Cause for Discipline (Failure to Comply with Regulations):* Respondent's Smog Inspector License is not subject to discipline pursuant to Health and Safety Code section 44072.2, subdivision (c). Complainant alleged, but did not establish by a preponderance of the evidence, that Respondent failed to comply with the following provisions of California Code of Regulations, title 16,:

a. Section 3340.24, subdivision (c): Falsely or fraudulently issuing electronic smog certificates of compliance for four vehicles.

b. Section 3340.30, subdivision (a): Issuing electronic smog certificates of

compliance for four vehicles even though the vehicles had not been inspected in accordance with section 3340.42.

c. Section 3340.41, subdivision (c): Knowingly entering false information into the emissions inspection system for four vehicles.

d. Section 3340.42: Failing to conduct the required smog tests on four vehicles in accordance with the Bureau's specifications. (Factual Findings 1-32.) However, it was established by a preponderance of the evidence that Respondent failed to safeguard his badge and password and that this badge and password were used by someone to commit the alleged acts in violation of the regulations. (Factual Findings 1-32.)

4. *Eleventh Cause for Discipline (Dishonesty, Fraud or Deceit)*: Respondent's Smog Check Inspector License is not subject to discipline pursuant to Health and Safety Code section 44072.2, subdivision (d), in that it was not established by a preponderance of the evidence that he committed dishonesty, fraudulent and deceitful acts or that he issued electronic smog certificates of compliance for four vehicles without performing bona fide inspections of the emission control devices and systems for those vehicles, thereby depriving the People of the State of California of the protection afforded by the Motor Vehicle Inspection Program. However, it was established by a preponderance of the evidence that Respondent failed to safeguard his badge and password and that this badge and password were used by someone to commit the alleged acts of dishonesty, fraud and deceit. (Factual Findings 1-32.)

The purpose of proceedings of this type is to protect the public, and not to punish an errant licensee. (E.g., *Camacho v. Youde* (1979) 95 Cal.App.3d 161, 164.) Complainant made specific allegations against Respondent which were not proven. However, that does not mean that Respondent's conduct was blameless. In light of the foregoing, Respondent is admonished that his failure to safeguard his badge and password are not harmless acts. Should he fail to safeguard them in the future, it would suggest that he has reckless disregard for his license and the applicable laws and regulations pertaining to them and it would be reasonable to subject the license to discipline under other provisions of the law at that time.

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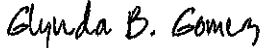
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ORDER

The Accusation is dismissed only as to Respondent Danny Paul Duyan also known as Danny Paul Kjellesvig.

DATED: December 10, 2018

DocuSigned by:  
  
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GLYNDA B. GOMEZ  
Administrative Law Judge  
Office of Administrative Hearings