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

12 In the Matter of the Accusation Against:

Case No. 79/25-21962

13 **SAIRA PEREZ-MEMBER/MANAGER**
14 **C&S SMOG LLC DBA C&S SMOG**
15 **6358 Wilmington Avenue Unit B**
16 **Los Angeles, CA 90001**
17 **Automotive Repair Dealer Registration No.**
18 **ARD 309587**
19 **Smog Check, Test-Only, Station License No.**
20 **TC 309587**

OAH No.

ACCUSATION

21 **SAIRA PEREZ**
22 **1261 E 91st Street**
23 **Los Angeles, CA 90002**
24 **Smog Check Station Inspector No.**
25 **EO 643524**

26 **and**

27 **EMMANUEL AYALA PACHECO**
28 **331 Morningside Terrace**
Palmdale, CA 93551
Smog Check Station Inspector No.
EO 643739

Respondents.

PARTIES

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

1 **Saira Perez-Member/Manager C&S Smog LLC dba C&S Smog**

2 **Automotive Repair Dealer Registration**

3 2. On or about July 24, 2024, the Bureau issued Automotive Repair Dealer Registration
4 Number ARD 309587 to Saira Perez-Member/Manager C&S Smog LLC dba C&S Smog
5 (“Respondent C&S Smog”). The Automotive Repair Dealer Registration was in full force and
6 effect at all times relevant to the charges brought herein and will expire on July 31, 2026, unless
7 renewed.

8 **Smog Check, Test-Only, Station License**

9 3. On or about September 13, 2024, the Bureau issued Smog Check, Test-Only, Station
10 License Number TC 309587 to Respondent C&S Smog. The Smog Check, Test-Only, Station
11 License was in full force and effect at all times relevant to the charges brought herein and will
12 expire on July 31, 2026, unless renewed.

13 **STAR Station Certification**

14 4. Respondent C&S Smog is also certified as a STAR Station. The certification was
15 issued on or about August 12, 2025, and was suspended on November 25, 2025.

16 **Saira Perez**

17 **Smog Check Inspector License**

18 5. On or about February 4, 2022, the Bureau issued Smog Check Inspector License
19 Number EO 643524 to Saira Perez (“Respondent Perez”). The Smog Check Inspector License
20 was in full force and effect at all times relevant to the charges brought herein and will expire on
21 September 30, 2027, unless renewed.

22 **Emmanuel Ayala Pacheco**

23 **Smog Check Inspector License**

24 6. On or about June 23, 2022, the Bureau issued Smog Check Inspector License Number
25 EO 643739 to Emmanuel Ayala Pacheco (“Respondent Pacheco”). The Smog Check Inspector
26 License was in full force and effect at all times relevant to the charges brought herein and will
27 expire on October 31, 2026, unless renewed.

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JURISDICTION

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2 7. Business and Professions Code (“Code”) section 9884.7 provides that the Director
3 may revoke an automotive repair dealer registration.

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

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

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

STATUTORY PROVISIONS

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17 11. Section 9884.7 of the Code states:

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

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

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28 (4) Any other conduct that constitutes fraud.

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

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

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12. Section 44012 of the Health and Safety Code states:

The test at the smog check stations shall be performed in accordance with procedures prescribed by the department and may require loaded mode dynamometer testing in enhanced areas, two-speed idle testing, testing utilizing a vehicle's onboard diagnostic system, or other appropriate test procedures as determined by the department in consultation with the state board. The department shall implement testing using onboard diagnostic systems, in lieu of loaded mode dynamometer or two-speed idle testing, on model year 2000 and newer vehicles only, beginning no earlier than January 1, 2013, and on model-year 1996-99, inclusive, vehicles only, beginning no earlier than January 1, 2025. However, the department, in consultation with the state board, may prescribe alternative test procedures that include loaded mode dynamometer or two-speed idle testing for vehicles with onboard diagnostic systems that the department and the state board determine exhibit operational problems. The department shall ensure, as appropriate to the test method, the following:

(a) Emission control systems required by state and federal law are reducing excess emissions in accordance with the standards adopted pursuant to subdivisions (a) and (c) of Section 44013.

(b) Motor vehicles are preconditioned to ensure representative and stabilized operation of the vehicle's emission control system.

(c) For other than diesel-powered vehicles, the vehicle's exhaust emissions of hydrocarbons, carbon monoxide, carbon dioxide, and oxides of nitrogen in an idle mode or loaded mode are tested in accordance with procedures prescribed by the department. In determining how loaded mode and evaporative emissions testing shall be conducted, the department shall ensure that the emission reduction targets for the enhanced program are met.

(d) For other than diesel-powered vehicles, the vehicle's fuel evaporative system and crankcase ventilation system are tested to reduce any nonexhaust sources of volatile organic compound emissions, in accordance with procedures prescribed by the department.

(e) For diesel-powered vehicles, a visual inspection is made of emission control devices and the vehicle's exhaust emissions are tested in accordance with procedures prescribed by the department, that may include, but are not limited to, onboard diagnostic testing. The test may include testing of emissions of any or all of the pollutants specified in subdivision (c) and, upon the adoption of applicable standards, measurement of emissions of smoke or particulates, or both.

(f) A visual or functional check is made of emission control devices specified by the department, including the catalytic converter in those instances in which the department determines it to be necessary to meet the findings of [Section 44001](#). The visual or functional check shall be performed in accordance with procedures prescribed by the department.

1 (g) A determination as to whether the motor vehicle complies with the
2 emission standards for that vehicle's class and model-year as prescribed by the
3 department.

4 (h) An analysis of pass and fail rates of vehicles subject to an onboard
5 diagnostic test and a tailpipe test to assess whether any vehicles passing their onboard
6 diagnostic test have, or would have, failed a tailpipe test, and whether any vehicles
7 failing their onboard diagnostic test have or would have passed a tailpipe test.

8 (i) The test procedures may authorize smog check stations to refuse the testing
9 of a vehicle that would be unsafe to test, or that cannot physically be inspected, as
10 specified by the department by regulation. The refusal to test a vehicle for those
11 reasons shall not excuse or exempt the vehicle from compliance with all applicable
12 requirements of this chapter.

13 13. Section 44015 of the Health and Safety Code states:

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15 (b) If a vehicle meets the requirements of Section 44012, a smog check station
16 licensed to issue certificates shall issue a certificate of compliance or a certificate of
17 noncompliance.

18 14. Section 44032 of the Health and Safety Code states:

19 No person shall perform, for compensation, tests or repairs of emission control
20 devices or systems of motor vehicles required by this chapter unless the person
21 performing the test or repair is a qualified smog check technician and the test or
22 repair is performed at a licensed smog check station. Qualified smog check
23 technicians shall perform tests of emission control devices and systems in accordance
24 with Section 44012.

25 15. Section 44059 of the Health and Safety Code states:

26 The willful making of any false statement or entry with regard to a material
27 matter in any oath, affidavit, certificate of compliance or noncompliance, or
28 application form which is required by this chapter or Chapter 20.3 (commencing with
Section 9880) of Division 3 of the Business and Professions Code, constitutes perjury
and is punishable as provided in the Penal Code.

16. 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.

. . . .

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

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

2 17. Section 44072.8 of the Health and Safety Code states:

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

5 18. Section 44072.10 of the Health and Safety Code, subdivision (c) states:

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

9 (1) Clean piping, clean plugging, clean glassing, clean tanking, or any other
10 fraudulent inspection practice, as defined by the department.

11 (2) Tampering with a vehicle emission control system or test analyzer system.

12 (3) Tampering with a vehicle in a manner that would cause the vehicle to
falsely pass or falsely fail an inspection.

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

15 **REGULATORY PROVISIONS**

16 19. California Code of Regulations, title 16, section 3340.24, states:

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

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

21 A licensed smog check inspector and/or repair technician shall comply with the
22 following requirements at all times while licensed:.

23 (a) Inspect, test and repair vehicles, as applicable, in accordance with section
24 44012 of the Health and Safety Code, section 44035 of the Health and
Safety Code, and section 3340.42 of this article..

25 21. California Code of Regulations, title 16, section 3340.35 states:

26 (c) A licensed station shall issue a certificate of compliance or noncompliance
27 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
28 emission control equipment and devices installed and functioning correctly.

1 22. California Code of Regulations, title 16, section 3340.41 states:

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3 (c) No person shall enter any vehicle identification information or emission
4 control system identification data for any vehicle other than the one being tested into
5 the EIS or OIS. Nor shall any person enter into the EIS or OIS any false information
6 about the vehicle being tested.

6 23. California Code of Regulations, title 16, section 3340.42, states:

7 Smog check inspection methods are prescribed in the Smog Check Manual,
8 referenced by section 3340.45.

9 (a) All vehicles subject to a smog check inspection, shall receive one of the
10 following test methods:

10 (1) A loaded-mode test shall be the test method used to inspect 1976 - 1999
11 model-year vehicle, except diesel-powered, registered in the enhanced program areas
12 of the state. The loaded-mode test shall measure hydrocarbon, carbon monoxide,
13 carbon dioxide and oxides of nitrogen emissions, as contained in the bureau's
14 specifications referenced in subsection (a) of Section 3340.17 of this article. The
15 loaded-mode test shall use Acceleration Simulation Mode (ASM) test equipment,
16 including a chassis dynamometer, certified by the bureau.

14 On and after March 31, 2010, exhaust emissions from a vehicle subject to this
15 inspection shall be measured and compared to the emissions standards shown in the
16 Vehicle Look-up Table (VLT) Row Specific Emissions Standards (Cutpoints) Table,
17 dated March 2010, which is hereby incorporated by reference. If the emissions
18 standards for a specific vehicle are not included in this table then the exhaust
19 emissions shall be compared to the emissions standards set forth in TABLE I or
20 TABLE II, as applicable. A vehicle passes the loaded-mode test if all of its measured
21 emissions are less than or equal to the applicable emission standards specified in the
22 applicable table.

19 (2) A two-speed idle mode test shall be the test method used to inspect 1976 -
20 1999 model-year vehicles, except diesel-powered, registered in all program areas of
21 the state, except in those areas of the state where the enhanced program has been
22 implemented. The two-speed idle mode test shall measure hydrocarbon, carbon
23 monoxide and carbon dioxide emissions at high RPM and again at idle RPM, as
24 contained in the bureau's specifications referenced in subsection (a) of Section
25 3340.17 of this article. Exhaust emissions from a vehicle subject to this inspection
26 shall be measured and compared to the emission standards set forth in this section and
27 as shown in TABLE III. A vehicle passes the two-speed idle mode test if all of its
28 measured emissions are less than or equal to the applicable emissions standards
specified in Table III.

25 (3) An OBD-focused test, shall be the test method used to inspect gasoline-
26 powered vehicles 2000 model-year and newer, and diesel-powered vehicles 1998
27 model-year and newer. The OBD test failure criteria are specified in section
28 3340.42.2.

(b) In addition to subsection (a), all vehicles subject to the smog check program
shall receive the following:

1 (1) A visual inspection of emission control components and systems to verify
the vehicle's emission control systems are properly installed.

2 (2) A functional inspection of emission control systems as specified in the
3 Smog Check Manual, referenced by section 3340.45, which may include an OBD
test, to verify their proper operation.

4 (c) The bureau may require any combination of the inspection methods in
5 sections (a) and (b) under any of the following circumstances:

6 (1) Vehicles that the department randomly selects pursuant to Health and Safety
Code section 44014.7 as a means of identifying potential operational problems with
7 vehicle OBD systems.

8 (2) Vehicles identified by the bureau as being operationally or physically
incompatible with inspection equipment.

9 (3) Vehicles with OBD systems that have demonstrated operational problems.

10 (d) Pursuant to section 39032.5 of the Health and Safety Code, gross polluter
standards are as follows:

11 (1) A gross polluter means a vehicle with excess hydrocarbon, carbon
12 monoxide, or oxides of nitrogen emissions pursuant to the gross polluter emissions
standards included in the tables described in subsection (a), as applicable.

13 (2) Vehicles with emission levels exceeding the emission standards for gross
14 polluters during an initial inspection will be considered gross polluters and the
provisions pertaining to gross polluting vehicles will apply, including, but not limited
15 to, sections 44014.5, 44015, and 44081 of the Health and Safety Code.

16 (3) A gross polluting vehicle shall not be passed or issued a certificate of
17 compliance until the vehicle's emissions are reduced to or below the applicable
emissions standards for the vehicle included in the tables described in subsection (a),
18 as applicable. However, the provisions described in section 44017 of the Health and
Safety Code may apply.

19 (4) This subsection applies in all program areas statewide to vehicles requiring
20 inspection pursuant to sections 44005 and 44011 of the Health and Safety Code.

21 24. California Code of Regulations, title 16, section 3373, states:

22 No automotive repair dealer or individual in charge shall, in filling out an
23 estimate, invoice, or work order, or record required to be maintained by section
24 3340.15(e) of this chapter, withhold therefrom or insert therein any statement or
information which will cause any such document to be false or misleading, or where
25 the tendency or effect thereby would be to mislead or deceive customers, prospective
customers, or the public.

26 **COST RECOVERY**

27 25. Section 125.3 of the Code provides, in pertinent part, that the Board may request the
28 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 licensee 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 **FACTUAL ALLEGATIONS**

6 26. During the course of regular duties, a Bureau Representative accessed the Vehicle
7 Information Database (“VID”) and reviewed Smog Check data transmitted from Respondent
8 C&S Smog. Additionally, the Bureau Representative accessed the VID and produced copies of
9 the BAR OIS Test Details and Certificate Sales.

10 27. During an On Board Diagnostic Inspection System inspection (“OIS”), engine
11 operating parameters are retrieved from the vehicle’s OBD II system and recorded to the VID.
12 This is accomplished during the functional portion of the OIS Smog Check Inspection by
13 plugging the Data Acquisition Device (“DAD”) into the vehicle’s Diagnostic Link Connector
14 (“DLC”) when prompted by the OIS analyzer screen prompt. Some of the parameters recorded
15 are:

- 16 • Engine speed in revolutions per minute (“RPM”).
- 17 • The throttle position is measured by a throttle position sensor (“TPS”) mounted onto
the throttle shaft. It is measured in a percentage of opening from 0% at idle and near
18 or up to 100% at full throttle.
- 19 • Manifold absolute pressure as measured by a manifold air pressure sensor (“MAP”)
connected to an intake manifold source, measured in kilo pascals (“kpa”). Typical
20 readings for a normally aspirated vehicle undergoing Smog Check inspection are as
follows: 25 kPa to 45 kPa at idle, with a subsequent decrease as the RPM is raised.
- 21 • Mass airflow as measured by a mass air flow sensor (“MAF”) mounted in the
engine’s air intake tract and measured in grams per second (“grams/sec”).

22 28. During normal engine operation at idle, the engine speed is relatively steady around
23 its target idle speed. With the engine idling, the TPS is steady and at or near 0%. The MAP
24 and/or MAF readings are also steady. In order for the engine speed to increase, the throttle would
25 have to be opened in order to increase airflow through the engine. The engine’s management
26 systems supply fuel and spark timing appropriate to any changes in throttle position and engine
27 speed. An increase in throttle, measured by the TPS, which increases engine RPM, would result
28 in a corresponding increase in MAF as well as a decrease in MAP.

1 29. During an OIS Smog Check Inspection, along with other visual and functional
2 inspections, there is an OBD II query portion of the inspection. The OBD II query is performed
3 with the engine idling and, when requested by the OIS analyzer, at an elevated or increased
4 engine speed. The increase in engine speed is performed by the smog check inspector by
5 stepping on the throttle pedal or manually opening the throttle, resulting in a corresponding
6 increase in engine RPMs by allowing an increase in airflow into the engine.

7 30. The Bureau Representative conducted a detailed review of the VID data for the Smog
8 Check inspections performed at Respondent C&S Smog’s facility. The review showed a pattern
9 of vehicles being certified with engine operating parameters not corresponding to normal engine
10 operation, that confirmed the vehicles that received smog certificates were not tested during the
11 OBD II functional test, which constituted clean plugging¹. The Bureau Representative’s
12 comprehensive review confirmed that nine (9) Smog Check Certificates of Compliance were
13 fraudulently issued to vehicles by Respondents C&S Smog, Perez, and Pacheco.

14 **Fraudulent Inspection No. 1-2006 Mini Cooper S**

15 31. A Bureau Representative reviewed the OIS Test Data for Respondent C&S Smog.
16 The review showed that on or about July 11, 2025, a 2006 Mini Cooper S was tested, and
17 Certificate of Compliance Number US065809C was issued by Respondent Perez.

18 32. The Dynamic PID charts and data for the 2006 Mini Cooper S showed that between
19 timestamps 110 and 21472, the engine RPM was steady at around 800 RPM. During this time,
20 the data showed that the throttle was fixed at 12.2% opening, rose to a fixed 12.5% opening,
21 dropped back to 12.2% opening, then rose back to 12.5% opening, and the MAP was varying
22 between 64 kPa and 68 kPa. After timestamp 21721, the engine RPM was increased and then
23 held at no less than 1743 RPM. During this time, the data showed that the throttle dropped from
24 11.8% opening to a fixed 11.4% opening, rose to 11.8% opening, then dropped back to a fixed
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27 ¹ “Clean plugging” is using a substitute vehicle's OBD system, or another source, to generate data readings or
28 diagnostic information in order to cause the OIS to issue a certificate of compliance for the test vehicle.

1 11.4% opening, and the MAP eventually dropped from 40 kPa to 35 kPa, rose to 38 kPa, then
2 dropped to 37 kPa.

3 33. The steady idle and elevated engine RPM data, along with the improbable throttle
4 positions, are not characteristic or expected for normal engine operation. The throttle position
5 readings are expected to be stable at idle and at the elevated engine RPM, not drop and rise
6 unexpectedly. Additionally, the throttle positions are expected to rise with the increase in engine
7 RPM, not decrease to values less than idle readings. The discrepancies in the OIS Test Data
8 proved that the OIS DAD was not connected to the 2006 Mini Cooper S being certified, which
9 caused the issuance of a fraudulent Smog Check Certificate of Compliance.

10 **Fraudulent Inspection No. 2-2005 Nissan Altima S**

11 34. A Bureau Representative reviewed the OIS Test Data for Respondent C&S Smog.
12 The review showed that on or about August 16, 2025, a 2005 Nissan Altima S was tested, and
13 Certificate of Compliance Number JF944081C was issued by Respondent Perez.

14 35. The Dynamic PID charts and data for the 2005 Nissan Altima S showed that between
15 timestamps 289 and 22150, the engine RPM was steady at around 882 RPM. During this time,
16 the data showed that the throttle was fixed at 4.3% opening, and the MAF was varying between
17 3.49 grams/sec and 3.62 grams/sec. After timestamp 22445, the engine RPM was increased and
18 then fluctuated before ultimately being held above 1262 RPM. During this time, the data showed
19 that the throttle was fixed at 3.9% opening, and the MAF gradually rose from 5.87 grams/sec to
20 7.54 grams/sec, then dropped to 7.51 grams/sec.

21 36. The steady idle and elevated engine RPMs, along with the improbable throttle
22 positions, were not characteristic or expected for normal engine operation. The throttle positions
23 were expected to rise with the increase in engine RPM, not decrease to values less than idle
24 readings. The discrepancies in the OIS Test Data proved that the OIS DAD was not connected to
25 the 2005 Nissan Altima S certified, which caused the issuance of a fraudulent Smog Check
26 Certificate of Compliance.

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1 **Fraudulent Inspection No. 3-2005 Toyota Tacoma Prerunner**

2 37. A Bureau Representative reviewed the OIS Test Data for Respondent C&S Smog.
3 The review showed that on or about September 4, 2025, a 2005 Toyota Tacoma Prerunner was
4 tested, and Certificate of Compliance Number US959402C was issued by Respondent Perez.

5 38. The Dynamic PID charts and data for the 2005 Toyota Tacoma Prerunner showed
6 that between timestamps 2222 and 19560, the engine RPM was steady at around 650 RPM.
7 During this time, the data showed that the throttle was fixed at 15.3% opening and the MAF was
8 fixed at 0.92 grams/sec. After timestamp 19785, the engine RPM was increased and then
9 ultimately held at no less than 1438 RPM. During this time, the data showed that the throttle rose
10 from 17.6% opening to a fixed 18.4% opening, and the MAF continued to be fixed at 0.92
11 grams/sec.

12 39. The steady idle and elevated engine RPMs, along with the improbable MAF readings,
13 were not characteristic or expected for normal engine operation. The MAF readings were
14 expected to rise with the increase in engine RPM, not remain at values equal to idle readings.
15 The discrepancies in the OIS Test Data proved that the OIS DAD was not connected to the 2005
16 Toyota Tacoma Prerunner being certified, which caused the issuance of a fraudulent Smog Check
17 Certificate of Compliance.

18 **Fraudulent Inspection No. 4-2001 Honda Accord LX**

19 40. A Bureau Representative reviewed the OIS Test Data for Respondent C&S Smog.
20 The review showed that on or about September 5, 2025, a 2001 Honda Accord LX was tested,
21 and Certificate of Compliance Number US959410C was issued by Respondent Perez.

22 41. The Dynamic PID charts and data for the 2001 Honda Accord LX showed that
23 between timestamps 107 and 24282, the engine RPM was steady at around 700 RPM. During
24 this time, the data showed that the throttle was fixed at 9.8% opening, and the MAP fluctuated
25 between 24 and 25 kPa. After timestamp 24518, the engine RPM was increased, then ultimately
26 held at no less than 1530 RPM. During this time, the data showed that the throttle eventually rose
27 from 12.9% opening to a fixed 14.1% opening, and the MAP rose from 23 kPa to 25 kPa, then
28 dropped to a fixed 24 kPa.

1 42. The steady idle and elevated engine RPMs, along with the improbable MAP readings,
2 were not characteristic or expected for normal engine operation. The MAP readings were
3 expected to be stable at idle and at the higher engine RPM, not drop and rise unexpectedly and/or
4 fluctuate. Additionally, the MAP readings were expected to decrease with the increase in engine
5 RPM, not ultimately increase to values greater than or equal to idle readings. The discrepancies
6 in the OIS Test Data proved that the OIS DAD was not connected to the 2001 Honda Accord LX
7 being certified, which caused the issuance of a fraudulent Smog Check Certificate of Compliance.

8 **Fraudulent Inspection No. 5-2002 Honda Accord EX**

9 43. A Bureau Representative reviewed the OIS Test Data for Respondent C&S Smog.
10 The review showed that on or about September 12, 2025, a 2002 Honda Accord EX was tested,
11 and Certificate of Compliance Number UU188912C was issued by Respondent Perez.

12 44. The Dynamic PID charts and data for the 2002 Honda Accord EX showed that
13 between timestamps 105 and 20331, the engine RPM was steady at around 700 RPM. During
14 this time, the data showed that the throttle was fixed at 9.8% opening, and the MAP was
15 fluctuating between 26 kPa and 27 kPa. After timestamp 20565, the engine RPM was increased
16 and then held at no less than 1534 RPM. During this time, the data showed that the throttle
17 eventually rose from 13.7% opening to a fixed 14.9% opening, and the MAP was fluctuating
18 between 26 kPa and 27 kPa.

19 45. The steady idle and elevated engine RPMs, along with the improbable MAP readings,
20 were not characteristic or expected for normal engine operation. The MAP readings were
21 expected to be stable at idle and at the higher engine RPM, not fluctuate. Additionally, the MAP
22 readings were expected to decrease with the increase in engine RPM, not increase to values
23 greater than or equal to idle readings. The discrepancies in the OIS Test Data proved that the OIS
24 DAD was not connected to the 2002 Honda Accord EX being certified, which caused the
25 issuance of a fraudulent Smog Check Certificate of Compliance.

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1 **Fraudulent Inspection No. 6-2003 Suzuki Vitara JLS**

2 46. A Bureau Representative reviewed the OIS Test Data for Respondent C&S Smog.
3 The review showed that on or about September 12, 2025, a 2003 Suzuki Vitara JLS was tested,
4 and Certificate of Compliance Number UU188917C was issued by Respondent Perez.

5 47. The Dynamic PID charts and data for the 2003 Suzuki Vitara JLS showed that
6 between timestamps 114 and 20878, the engine RPM was steady at around 745 RPM. During
7 this time, the data showed that the throttle was fixed at 12.2% opening, the MAP was fluctuating
8 erratically between 26 kPa and 28 kPa, and the MAF was varying between 2.39 grams/sec and
9 2.42 grams/sec. After timestamp 21113, the engine RPM was increased, then ultimately held at
10 no less than 1516 RPM. During this time, the data showed that the throttle rose from 18%
11 opening to a fixed 18.4% opening, the MAP was fluctuating erratically between 24 kPa and 27
12 kPa, and the MAF eventually rose from 5.49 grams/sec to 6.24 grams/sec.

13 48. The steady idle and elevated engine RPMs, along with the improbable MAP readings,
14 were not characteristic or expected for normal engine operation. The MAP readings were
15 expected to be stable at idle and at the higher engine RPM, not fluctuate. Additionally, the MAP
16 readings were expected to decrease with the increase in engine RPM, not increase to values
17 greater than or equal to idle readings. The discrepancies in the OIS Test Data proved that the OIS
18 DAD was not connected to the 2003 Suzuki Vitara JLS being certified, which caused the issuance
19 of a fraudulent Smog Check Certificate of Compliance.

20 **Fraudulent Inspection No. 7-2003 Honda Accord LX**

21 49. A Bureau Representative reviewed the OIS Test Data for Respondent C&S Smog.
22 The review showed that on or about September 18, 2025, a 2003 Honda Accord LX was tested,
23 and Certificate of Compliance Number UU365622C was issued by Respondent Perez.

24 50. The Dynamic PID charts and data for the 2003 Honda Accord LX showed that
25 between timestamps 245 and 20104, the engine RPM was steady at around 800 RPM. During
26 this time, the data showed that the throttle was fixed at 9% opening, the MAP was fluctuating
27 erratically between 25 kPa and 26 kPa, and the MAF was varying between 3.2 grams/sec and 3.47
28 grams/sec. After timestamp 20335, the data showed the engine RPM was increased and then held

1 at no less than 1670 RPM. During this time, the data showed that the throttle rose from 13.7%
2 opening to fixed 14.1% opening, the MAP rose from a fixed 25 kPa to 26 kPa, then dropped back
3 to a fixed 25 kPa, and the MAF eventually rose from 7.23 grams/sec to 8.1 grams/sec, dropped to
4 7.82 grams/sec, then rose to 8.18 grams/sec.

5 51. The steady idle and elevated engine RPMs, along with the improbable MAP readings,
6 were not characteristic or expected for normal engine operation. The MAP readings were
7 expected to be stable at idle and at the higher engine RPM, not drop and rise unexpectedly and/or
8 fluctuate. Additionally, the MAP readings were expected to decrease with the increase in engine
9 RPM, not increase to values greater than or equal to idle readings. The discrepancies in the OIS
10 Test Data proved that the OIS DAD was not connected to the 2003 Honda Accord LX being
11 certified, which caused the issuance of a fraudulent Smog Check Certificate of Compliance.

12 **Fraudulent Inspection No. 8-2003 Mercedes-Benz E 320**

13 52. A Bureau Representative reviewed the OIS Test Data for Respondent C&S Smog.
14 The review showed that on or about October 25, 2025, a 2003 Mercedes-Benz E 320 was tested,
15 and Certificate of Compliance Number UU949387C was issued by Respondent Pacheco.

16 53. The Dynamic PID charts and data for the 2003 Mercedes-Benz E 320 showed that
17 between timestamps 158 and 17254, the engine RPM was steady at around 690 RPM. During
18 this time, the data showed that the throttle was fixed at 3.1% opening, the MAP was varying
19 between 91 kPa and 92 kPa, and the MAF was varying between 2.66 grams/sec and 2.75
20 grams/sec. After timestamp 17542, the engine RPM was increased and then eventually held
21 steady at around 1675. During this time, the data showed that the throttle rose from 5.9%
22 opening to 6.3% opening, then dropped back to 5.9% opening, the MAP was fixed at 92, then
23 dropped to 91 kPa, and the MAF varied between 6.69 grams/sec and 6.77 grams/sec.

24 54. The steady idle and steady elevated engine RPMs, along with the improbable MAP
25 readings, were not characteristic or expected for normal engine operation. The MAP readings
26 were expected to be stable at idle and at the higher engine RPM. Additionally, the MAP readings
27 were expected to decrease with the increase in engine RPM, not increase to values greater than or
28 equal to idle readings. The discrepancies in the OIS Test Data proved that the OIS DAD was not

1 connected to the 2003 Mercedes-Benz E 320 being certified, which caused the issuance of a
2 fraudulent Smog Check Certificate of Compliance.

3 **Fraudulent Inspection No. 9-2006 Ford F150 Supercrew**

4 55. A Bureau Representative reviewed the OIS Test Data for Respondent C&S Smog.
5 The review showed that on or about November 19, 2025, a 2006 Ford F150 Supercrew was
6 tested, and Certificate of Compliance Number UW751021C was issued by Respondent Pacheco.

7 56. The Dynamic PID charts and data for the 2006 Ford F150 Supercrew showed that
8 between timestamps 2354 and 18774, the engine RPM was steady at around 640 RPM. During
9 this time, the data showed that the throttle was fixed at 14.9% opening, the MAP was fixed at 34
10 kPa, and the MAF was varying between 4.7 grams/sec and 4.97 gams/sec. After timestamp
11 19014, the engine RPM was increased and then fluctuated before ultimately being held steady at
12 around 1450. During this time, the data showed that the throttle rose from 18% opening to 18.4%
13 opening, then dropped back to a fixed 18% opening, the MAP eventually rose from 37 kPa to 46
14 kPa, then dropped to a fixed 44 kPa, and the MAF eventually dropped gradually from 15.91
15 grams/sec to 12.22 grams/sec.

16 57. The steady idle and elevated engine RPMs, along with the improbable MAP readings,
17 were not characteristic or expected for normal engine operation. The MAP readings were
18 expected to be stable at idle and at the higher engine RPM, not drop and rise unexpectedly.
19 Additionally, the MAP readings were expected to decrease with the increase in engine RPM, not
20 increase to values greater than idle readings. The discrepancies in the OIS Test Data proved that
21 the OIS DAD was not connected to the 2006 Ford F150 Supercrew being certified, which caused
22 the issuance of a fraudulent Smog Check Certificate of Compliance.

23 **FIRST CAUSE FOR DISCIPLINE**

24 **(Untrue or Misleading Statements)**

25 58. Respondent C&S Smog's Automotive Repair Registration is subject to discipline
26 pursuant to Code section 9884.7, subdivision (a)(1) and California Code of Regulations, title 16,
27 section 3373, in that between July 11, 2025, through November 19, 2025, Respondent C&S Smog
28 made or authorized statements which he knew or in the exercise of reasonable care should have

1 known to be untrue or misleading, as follows: Respondent C&S Smog certified that vehicles 1
2 through 9, set forth above, had passed inspection and were in compliance with applicable laws
3 and regulations. Respondent C&S Smog conducted the inspections on the vehicles using the
4 clean plugging method by substituting or using different vehicles or another source during the
5 OBD II functional tests to issue smog check certificates of compliance for the nine (9) vehicles,
6 and did not test or inspect the nine (9) vehicles as required by Health and Safety Code section
7 44012. Complainant refers to, and by this reference incorporates, the allegations set forth above
8 in paragraphs 26 through 57, as though fully set forth.

9 **SECOND CAUSE FOR DISCIPLINE**

10 **(Fraud)**

11 59. Respondent C&S Smog's Automotive Repair Registration is subject to discipline
12 pursuant to Code section 9884.7, subdivision (a)(4), in that between July 11, 2025, through
13 November 19, 2025, Respondent C&S Smog committed acts that constitute fraud by issuing
14 electronic smog check certificates of compliance for vehicles 1 through 9, set forth above,
15 without performing bona fide inspections of the emission control devices and systems on those
16 vehicles, thereby depriving the People of the State of California of the protection afforded by the
17 Motor Vehicle Inspection Program. Complainant refers to, and by this reference incorporates, the
18 allegations set forth above in paragraphs 26 through 57, as though fully set forth.

19 **THIRD CAUSE FOR DISCIPLINE**

20 **(Material Violation of Automotive Repair Act)**

21 60. Respondent C&S Smog's Automotive Repair Registration is subject to disciplinary
22 action under Code section 9884.7, subdivision (a)(6), in that between July 11, 2025, through
23 November 19, 2025, regarding vehicles 1 through 9, set forth above, Respondent C&S Smog
24 failed in a material respect to comply with the provisions of this chapter or regulations adopted
25 pursuant to it by issuing electronic smog check certificates of compliance for the nine (9) vehicles
26 without performing bona fide inspections of the emissions control devices and systems on those
27 vehicles, thereby depriving the People of the State of California of the protection afforded by the
28

1 Motor Vehicle Inspection Program. Complainant refers to, and by this reference incorporates, the
2 allegations set forth above in paragraphs 26 through 57, as though fully set forth.

3 **FOURTH CAUSE FOR DISCIPLINE**

4 **(Failure to Comply with the Motor Vehicle Inspection Program)**

5 61. Respondent C&S Smog's Smog Check, Test-Only Station License is subject to
6 discipline pursuant to Health and Safety Code section 44072.2, subdivision (a), in that between
7 July 11, 2025, through November 19, 2025, regarding vehicles 1 through 9, set forth above,
8 Respondent C&S Smog failed to comply with the following sections of that Code:

9 a. **Section 44012:** Respondent C&S Smog failed to ensure that the emission control tests
10 were performed on vehicles 1 through 9, in accordance with procedures prescribed by the
11 department.

12 b. **Section 44015, subdivision (b):** Respondent C&S Smog issued electronic smog check
13 certificates of compliance for vehicles 1 through 9, without ensuring that the vehicles were
14 properly tested and inspected to determine if they were in compliance with Health and Safety
15 Code section 44012.

16 c. **Section 44059:** Respondent C&S Smog willfully made false entries for the electronic
17 smog check certificates of compliance by certifying that those vehicles had been inspected as
18 required when, in fact, they had not.

19 Complainant refers to, and by this reference incorporates, the allegations set forth above in
20 paragraphs 26 through 57, as though fully set forth.

21 **FIFTH CAUSE FOR DISCIPLINE**

22 **(Failure to Comply with Regulations Pursuant to the**
23 **Motor Vehicle Inspection Program)**

24 62. Respondent C&S Smog's Smog Check, Test-Only Station License is subject to
25 discipline pursuant to Health and Safety Code section 44072.2, subdivision (c), in that between
26 July 11, 2025, through November 19, 2025, regarding vehicles 1 through 9, set forth above,
27 Respondent C&S Smog failed to comply with provisions of California Code of Regulations, title
28 16, as follows:

1 a. **Section 3340.24, subdivision (c)**: Respondent C&S Smog falsely or fraudulently issued
2 electronic smog check certificates of compliance for those vehicles without performing bona fide
3 inspections of the emission control devices and systems on the vehicles as required by Health and
4 Safety Code section 44012.

5 b. **Section 3340.35, subdivision (c)**: Respondent C&S Smog issued electronic smog check
6 certificates of compliance even though those vehicles had not been inspected in accordance with
7 section 3340.42 of that Code.

8 c. **Section 3340.41, subdivision (c)**: Respondent C&S Smog knowingly entered false
9 information into the On Board Diagnostic inspection system for the nine (9) vehicles identified
10 above.

11 d. **Section 3340.42**: Respondent C&S Smog failed to conduct the required smog check
12 tests and inspections on those vehicles in accordance with the Bureau's specifications.

13 Complainant refers to, and by this reference incorporates, the allegations set forth above in
14 paragraphs 26 through 57, as though fully set forth.

15 **SIXTH CAUSE FOR DISCIPLINE**

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

17 63. Respondent C&S Smog's Smog Check, Test-Only Station License is subject to
18 discipline pursuant to Health and Safety Code sections 44072.2, subdivision (d) in conjunction
19 with 44072.10, subdivision (c), in that between July 11, 2025, through November 19, 2025,
20 regarding vehicles 1 through 9, set forth above, Respondent C&S Smog committed acts involving
21 dishonesty, fraud or deceit whereby another was injured by issuing electronic smog check
22 certificates of compliance for those vehicles without performing bona fide inspections of the
23 emission control devices and systems on the vehicles, thereby depriving the People of the State of
24 California of the protection afforded by the Motor Vehicle Inspection Program. Complainant
25 refers to, and by this reference incorporates, the allegations set forth above paragraphs 26 through
26 57, as though fully set forth.

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1 **SEVENTH CAUSE FOR DISCIPLINE**

2 **(Violations of the Motor Vehicle Inspection Program – Respondent Perez)**

3 64. Respondent Perez’s Smog Check Inspector License is subject to disciplinary action
4 under Health and Safety Code section 44072.2, subdivision (a), in that between July 11, 2025,
5 through September 18, 2025, regarding vehicles 1 through 7, set forth above, Respondent Perez
6 violated the following Health and Safety Code sections:

7 a. **Section 44012, subdivision (a):** Respondent Perez failed to determine that all
8 emission control devices and systems required by law were installed and functioning correctly on
9 the vehicles identified above in accordance with test procedures prescribed by the Bureau.

10 b. **Section 44012, subdivision (f):** Respondent Perez failed to perform emission control
11 tests on the vehicles identified above in accordance with procedures prescribed by the Bureau.

12 c. **Section 44032:** Respondent Perez failed to perform tests of the emission control
13 devices and systems on the vehicles identified above in accordance with section 44012 of the
14 Health and Safety Code, in that the vehicles had been clean plugged.

15 d. **Section 44059:** Respondent Perez willfully made false entries for the electronic
16 smog check certificates of compliance by certifying that the vehicles identified above had been
17 inspected as required when, in fact, they had not.

18 Complainant refers to, and by this reference incorporates, the allegations set forth above in
19 paragraphs 26 through 51, as though fully set forth.

20 **EIGHTH CAUSE FOR DISCIPLINE**

21 **(Failure to Comply with Regulations Pursuant to the**
22 **Motor Vehicle Inspection Program – Respondent Perez)**

23 65. Respondent Perez’s Smog Check Inspector License is subject to discipline pursuant
24 to Health and Safety Code section 44072.2, subdivision (c), in that between July 11, 2025,
25 through September 18, 2025, regarding vehicles 1 through 7, set forth above, Respondent Perez
26 failed to comply with provisions of California Code of Regulations, title 16, as follows:

27 a. **Section 3340.24, subdivision (c):** Respondent Perez falsely or fraudulently issued
28 electronic smog check certificates of compliance without performing bona fide inspections of the

1 emission control devices and systems on those vehicles as required by Health and Safety Code
2 section 44012.

3 b. **Section 3340.30 subdivision (a)**: Respondent Perez failed to inspect and test those
4 vehicles in accordance with Health and Safety Code sections 44012.

5 c. **Section 3340.41, subdivision (c)**: Respondent Perez knowingly entered false
6 information into the On Board Diagnostic inspection system for the nine (9) vehicles identified
7 above.

8 d. **Section 3340.42**: Respondent Perez failed to conduct the required smog check tests and
9 inspections on those vehicles in accordance with the Bureau's specifications.

10 Complainant refers to, and by this reference incorporates, the allegations set forth above in
11 paragraphs 26 through 51, as though fully set forth.

12 **NINTH CAUSE FOR DISCIPLINE**

13 **(Dishonesty, Fraud, or Deceit – Respondent Perez)**

14 66. Respondent Perez's Smog Check Inspector License is subject to disciplinary action
15 under Health and Safety Code section 44072.2, subdivision (d), in conjunction with Health and
16 Safety Code section 44072.10, subdivision (c), in that between July 11, 2025, through September
17 18, 2025, regarding vehicles 1 through 7, set forth above, Respondent Perez committed acts
18 involving dishonesty, fraud, or deceit when he issued electronic smog check certificates of
19 compliance for the vehicles without performing bona fide inspections of the emission control
20 devices and systems on those vehicles, thereby depriving the People of the State of California of
21 the protection afforded by the Motor Vehicle Inspection Program. Complainant refers to, and by
22 this reference incorporates, the allegations set forth above in paragraphs 26 through 51, as though
23 fully set forth.

24 **TENTH CAUSE FOR DISCIPLINE**

25 **(Violations of the Motor Vehicle Inspection Program – Respondent Pacheco)**

26 67. Respondent Pacheco's Smog Check Inspector License is subject to disciplinary action
27 under Health and Safety Code section 44072.2, subdivision (a), in that between October 25, 2025,
28

1 through November 19, 2025, regarding vehicles 8 through 9, set forth above, Respondent Pacheco
2 violated the following Health and Safety Code sections:

3 a. **Section 44012, subdivision (a):** Respondent Pacheco failed to determine that all
4 emission control devices and systems required by law were installed and functioning correctly on
5 the vehicles identified above in accordance with test procedures prescribed by the Bureau.

6 b. **Section 44012, subdivision (f):** Respondent Pacheco failed to perform emission
7 control tests on the vehicles identified above in accordance with procedures prescribed by the
8 Bureau.

9 c. **Section 44032:** Respondent Pacheco failed to perform tests of the emission control
10 devices and systems on the vehicles identified above in accordance with section 44012 of the
11 Health and Safety Code, in that the vehicles had been clean plugged.

12 d. **Section 44059:** Respondent Pacheco willfully made false entries for the electronic
13 smog check certificates of compliance by certifying that the vehicles identified above had been
14 inspected as required when, in fact, they had not.

15 Complainant refers to, and by this reference incorporates, the allegations set forth above in
16 paragraphs 26 through 30 and 52 through 57, as though fully set forth.

17 **ELEVENTH CAUSE FOR DISCIPLINE**

18 **(Failure to Comply with Regulations Pursuant to the**
19 **Motor Vehicle Inspection Program – Respondent Pacheco)**

20 68. Respondent Pacheco’s Smog Check Inspector License is subject to discipline
21 pursuant to Health and Safety Code section 44072.2, subdivision (c), in that between October 25,
22 2025, through November 19, 2025, regarding vehicles 8 through 9, set forth above, Respondent
23 Pacheco failed to comply with provisions of California Code of Regulations, title 16, as follows:

24 a. **Section 3340.24, subdivision (c):** Respondent Pacheco falsely or fraudulently issued
25 electronic smog check certificates of compliance without performing bona fide inspections of the
26 emission control devices and systems on those vehicles as required by Health and Safety Code
27 section 44012.

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1 C&S Smog, is revoked or suspended, any additional license issued under Chapter 5 of Part 5 of
2 Div 26 of the Health and Safety Code in the name of said licensee may be likewise revoked or
3 suspended by the director.

4 72. Pursuant to Health and Safety Code section 44072.8, if Smog Check Inspector
5 License No. EO 643524, issued to Saira Perez, is revoked or suspended, any additional license
6 issued under Chapter 5 of Part 5 of Div 26 of the Health and Safety Code in the name of said
7 licensee may be likewise revoked or suspended by the director.

8 73. Pursuant to Health and Safety Code section 44072.8, if Smog Check Inspector
9 License No. EO 643739, issued to Emmanuel Ayala Pacheco, is revoked or suspended, any
10 additional license issued under Chapter 5 of Part 5 of Div 26 of the Health and Safety Code in the
11 name of said licensee may be likewise revoked or suspended by the director.

12 **PRAYER**

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

16 1. Revoking or suspending Automotive Repair Dealer Registration Number ARD
17 309587, issued to C&S Smog LLC;

18 2. Revoking, suspending, or placing on probation any other automotive repair dealer
19 registration issued in the name of C&S Smog LLC;

20 3. Revoking or suspending Smog Check, Test-Only, Station License Number TC
21 309587, issued to C&S Smog LLC;

22 4. Revoking or suspending any additional license issued under Chapter 5 of Part 5 of
23 Division 26 of the Health and Safety Code in the name of C&S Smog LLC;

24 5. Revoking or suspending Smog Check Inspector License Number EO 643524, issued
25 to Saira Perez;

26 6. Revoking or suspending any additional license issued under Chapter 5 of Part 5 of
27 Division 26 of the Health and Safety Code in the name of Saira Perez;

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1 7. Revoking or suspending Smog Check Inspector License Number EO 643739, issued
2 to Emmanuel Ayala Pacheco;

3 8. Revoking or suspending any additional license issued under Chapter 5 of Part 5 of
4 Division 26 of the Health and Safety Code in the name of Emmanuel Ayala Pacheco;

5 9. Ordering Saira Perez, C & S Smog LLC, and Emmanuel Pacheco to pay the Bureau
6 of Automotive Repair the reasonable costs of the investigation and enforcement of this case,
7 pursuant to Business and Professions Code section 125.3, and if placed on probation, the costs of
8 probation monitoring;

9 and,

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

11
12 DATED: As of Digital Signature Date

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

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