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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. 79/25-7676

13 **ABEL RIVAS SANTAMARIA**  
**dba AR SMOG CHECK TEST ONLY**  
14 11035 Atlantic Avenue  
Lynwood, CA 90262

**ACCUSATION**

15 **Automotive Repair Dealer Registration No.**  
**ARD 301313**  
16 **Smog Check, Test Only, Station License No.**  
**TC 301313**

18 **ABEL RIVAS-SANTAMARIA**  
8316 Comstock Ave  
19 Whittier, CA 90602

20 **Smog Check Inspector No. EO 644002**

21 **and**

22 **KEVIN EMMANUEL VELASQUEZ**  
**CHACON**  
23 5450 N Paramount Bl Spc #68  
Long Beach, CA 90805

24 **Smog Check Inspector No. EO 644423**

25  
26 Respondents.  
27  
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1 **PARTIES**

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

4 2. On or about December 15, 2021, Bureau of Automotive Repair issued Automotive  
5 Repair Dealer Registration Number ARD 301313 to Abel Rivas-Santamaria (Respondent Rivas-  
6 Santamaria), dba AR Smog Check Test Only. The Automotive Repair Dealer Registration was in  
7 full force and effect at all times relevant to the charges brought herein and was due to expire on  
8 December 31, 2025, however, was canceled on March 3, 2025.

9 3. On or about February 24, 2022, Bureau of Automotive Repair issued Smog Check,  
10 Test-Only, Station License Number TC 301313 to Respondent Rivas-Santamaria, dba AR Smog  
11 Check Test Only. The Smog Check, Test-Only, Station License was in full force and effect at all  
12 times relevant to the charges brought herein and was due to expire on December 31, 2025,  
13 however, was canceled on March 3, 2025.

14 4. On or about November 7, 2022, Bureau of Automotive Repair issued Smog Check  
15 Inspector License Number EO 644002 to Respondent Rivas-Santamaria. The Smog Check  
16 Inspector License was in full force and effect at all times relevant to the charges brought herein  
17 and will expire on July 31, 2026, unless renewed.

18 5. On or about July 3, 2023, Bureau of Automotive Repair issued Smog Check Inspector  
19 License Number EO 644423 to Kevin Emmanuel Velasquez Chacon (Respondent Chacon). The  
20 Smog Check Inspector License was in full force and effect at all times relevant to the charges  
21 brought herein, expired on April 30, 2025, and has not been renewed.

22 **JURISDICTION**

23 6. Business and Professions Code (“BPC”) section 9884.13 provides, in pertinent part,  
24 that the expiration of a valid registration shall not deprive the Director of jurisdiction to proceed  
25 with a disciplinary proceeding against an automotive repair dealer or to render a decision  
26 temporarily or permanently invalidating (suspending or revoking) a registration.

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1           11. Section 44012 of the HSC provides, in pertinent part, that tests at smog check stations  
2 shall be performed in accordance with procedures prescribed by the department.

3           12. Section 44015, subdivision (b), of the HSC provides that a certificate of compliance  
4 shall be issued if a vehicle meets the requirements of HSC section 40012.

5           13. Section 44032 of the HSC states, in pertinent part, that: (1) no person may perform  
6 tests or repairs of emission control devices or systems of motor vehicles required by the Motor  
7 Vehicle Inspection Program unless the person performing the test or repair is a licensed qualified  
8 smog check technician; and (2) all tests must be conducted in accordance with section 44012 (i.e.  
9 Motor Vehicle Inspection Program Requirements).

10          14. Section 44059 of the HSC provides:

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

15          15. Section 44072.2 of the HSC states, in pertinent part:

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

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

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

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

25          16. Section 44072.8 of the HSC states that when a license has been revoked or suspended  
26 following a hearing under this article, any additional license issued under this chapter in the name  
27 of the licensee may be likewise revoked or suspended by the director.

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1 **COST RECOVERY**

2 23. Section 125.3, subdivision (a), of the BPC provides, in pertinent part, that a Board  
3 “may request the administrative law judge to direct a licentiate found to have committed  
4 violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the  
5 investigation and enforcement of the case.”

6 **SUMMARY OF ON-BOARD DIAGNOSTIC SYSTEM (OIS) INSPECTIONS**

7 24. Beginning March 9, 2015, California’s Smog Check Program was updated to require  
8 the use of an On-Board Diagnostic Inspection System (OIS). OIS is the Smog Check equipment  
9 required in all areas of the State when inspecting most model-year 2000 and newer gasoline and  
10 hybrid vehicles and most 1998 and newer diesel vehicles. The system consists of a certified Data  
11 Acquisition Device (DAD), computer, bar code scanner, and printer. The DAD is an On Board  
12 Diagnostic (OBD) scan tool that, when requested by the California OIS software, retrieves OBD  
13 data from the vehicle. All OBD data that the vehicle indicates it supports is requested by the  
14 California OIS software and will be retrieved.

15 25. The DAD connects between the OIS computer and the vehicle’s Diagnostic Link  
16 Connector (DLC) located in the vehicle’s passenger compartment, which allows for the retrieval  
17 of information from the vehicle’s on-board computer system. The California OIS software  
18 requires a continuous Internet connection when performing a Smog Check inspection and the OIS  
19 software communicates with BAR’s central database through the Internet connection. The bar  
20 code scanner is used to input technician information, the vehicle’s identification number (VIN),  
21 and DMV renewal information. The printer provides a Vehicle Inspection Report (VIR)  
22 containing inspection results for motorists and a Smog Check Certificate of Compliance number  
23 for passing vehicles.

24 26. Data retrieved and recorded during an OIS smog check includes; the eVIN, which is  
25 the digitally stored VIN programmed by the manufacturer into the vehicle’s Powertrain Control  
26 Module (PCM); the communication protocol, which is the manufacturer/vehicle specific language  
27 the PCM uses to Relay or communicate information. The communication protocol is  
28 programmed into the vehicle’s on-board computer during manufacture and does not change.

1           27. Other data retrieved and recorded during an OIS smog check includes the number of  
2 Parameter Identifications (PIDs), which refers to the number of specific data values that the  
3 vehicle's PCM uses related to emissions controls. The specific data values associated with a  
4 vehicle's PIDs are also retrieved and recorded during an OIS smog check inspection. That data  
5 include things such as the vehicle's engine speed, throttle position, manifold absolute pressure,  
6 the engine's mass air flow, and ignition timing advance readings throughout an inspection.  
7 Accordingly, the following types of data are recorded during an OIS smog check inspection:

- 8           • Engine speed in revolutions per minute (RPM)
- 9           • Throttle position as measured by a throttle position sensor (TPS) mounted onto the  
10            throttle shaft. Measured in a percentage of opening from 0% at idle and near or up  
11            to 100% at full throttle. In internal combustion vehicles, TPS increases as RPM  
12            increases.
- 13          • Manifold absolute pressure as measured by a manifold air pressure sensor (MAP)  
14            connected to an intake manifold source, measured in kilo pascals (kpa). Typical  
15            readings for a normally aspirated vehicle as follows: 0 kpa being absolute vacuum,  
16            25kpa to 45kpa at idle, 101 kpa at full throttle, same as atmospheric pressure at sea  
17            level. In internal combustion vehicles, MAP decreases as RPM increases.
- 18          • Mass air flow as measured by a mass air flow sensor (MAF) mounted in the engine's  
19            air intake tract. Measured in grams per second (gps). In internal combustion  
20            vehicles, MAF increases as RPM increases.
- 21          • Ignition timing is set by the vehicle PCM based on engine speed and load and is  
22            measured in degrees Before Top Dead Center (BTDC).

### 23           **EXPLANATION OF CLEAN PIPING AND CLEAN PLUGGING**

24           28. BAR has become aware of methods that some Smog Check stations and Smog Check  
25 inspectors use to fraudulently issue smog certificates to vehicles that will not pass a Smog Check  
26 test, or in some instances, are not even present during the time that the test is performed. One  
27 such method, which is known as "clean piping", involves using the emission sample of a known

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1 clean vehicle or other source to substitute for the emissions of a vehicle that will not pass a BAR  
2 97 tailpipe inspection or is not present at the time of the BAR 97 inspection.

3 29. Another common method of fraudulent inspection, known as “clean plugging”,  
4 involves using another vehicle’s properly functioning OBD II system, or another source such as a  
5 defeat device/simulator, to generate passing data readings or diagnostic information for the  
6 purpose of fraudulently issuing smog certificates to vehicles that are not in smog compliance  
7 and/or are not present for testing.

8 30. Defeat devices attempt to simulate engine operation during a Smog Check inspection  
9 by transmitting OBD II data to the VID that has been modified or replaced entirely for the  
10 purportedly inspected vehicle during the functional portion of the OIS inspection. The use of a  
11 defeat device/simulator during a Smog Check inspection constitutes clean plugging and is strictly  
12 prohibited. As described in more detail below, BAR is able to utilize the data retrieved and  
13 recorded during an OIS smog check to identify inspections in which a defeat device/simulator  
14 was used.

15 31. During normal engine operation at idle, engine speed is relatively steady around its  
16 target idle speed. With the engine idling, the TPS is steady and at or near 0%. The MAP and/or  
17 MAF readings are also steady. For the engine speed to increase, the throttle would have to be  
18 opened to increase airflow through the engine. The engine’s management systems supply fuel and  
19 spark timing appropriate to any changes in throttle position and engine speed. An increase in  
20 throttle, measured by the TPS, which increases engine RPM, would result in corresponding  
21 increases in MAF as well as a change in MAP. Stated another way, any movement in the throttle  
22 from the idle position will result in an increase of airflow through the engine with corresponding  
23 increases RPM and/or MAF along with changes in MAP.

24 32. Clean plugging is apparent in cases where the data recorded during an OIS smog  
25 check shows that the engine speed as measured in RPM increases during the test but the throttle  
26 position remains unchanged, the mass air flow rate is unchanged, the manifold absolute pressure  
27 is unchanged, and the ignition timing advance readings are unchanged. Because engine speed as  
28 measured in RPM cannot increase without changes in throttle position, MAF, MAP and ignition

1 timing advance readings, test data in such cases demonstrates that a defeat device was used to  
2 simulate engine speed (RPM) readings for a vehicle that was not actually tested.

### 3 **RESPONDENTS' FRAUDULENT SMOG INSPECTIONS**

4 33. A Bureau program representative analyzed specific OIS Test Data for inspections  
5 performed at Respondent Rivas-Santamaria's station between May 14, 2024 and November 19,  
6 2024. The investigation revealed that the data related to certain vehicles certified at Respondent  
7 Rivas-Santamaria's station by Respondent Chacon contained a pattern of unmistakable  
8 discrepancies between the information transmitted during the inspections and the recognized and  
9 scientifically established characteristics of internal combustion engine operation.

10 34. Specifically, the Bureau program representative identified 10 instances in which the  
11 throttle position, MAF and/or MAP readings fluctuated to unfeasible degrees while the vehicles  
12 were held at steady idle and steady elevated engine speeds.<sup>1</sup> The data for the inspections at issue  
13 also showed that, impossibly, the throttle position and MAF had lower data points during the  
14 elevated engine RPM stage of the inspections than at idle. For example, data from Respondent  
15 Rivas-Santamaria's May 14, 2024, inspection of a 2004 Kia Amanti, (Clean Plug #1) shows that  
16 at a time in which the vehicle's engine speed was supposedly being held steady at around 725  
17 RPM the vehicle's throttle position dropped from an 11% opening to a 10.6% opening and the  
18 MAF rose from 3.3gps to 4.57gps. Additionally, the data shows that at a time in which the  
19 vehicle's engine speed was supposedly being held steady at approximately 2035 RPM, the  
20 throttle position dropped from a 9.4% opening to an 8.6% opening and the MAF rose from  
21 4.14gps to 4.52gps. Such conditions would not have occurred if the DAD had been connected to  
22 the vehicles that were purportedly being tested instead of a defeat device.

23 35. These documented discrepancies confirm that, in performing the inspections at issue,  
24 Respondents engaged in the illegal activity of clean plugging in order to issue fraudulent  
25 certificates of compliance for the vehicles. The following chart ("Table 1") illustrates the  
26 documented clean plugging activities by Respondents during the period reviewed.

27 \_\_\_\_\_  
28 <sup>1</sup> Not all vehicles include both MAP and MAF parameters. Many vehicle manufacturers  
include only one of these parameters.

**Table 1**

<b>Test Date</b>	<b>Vehicle Certified &amp; License No./VIN</b>	<b>Certificate No.</b>	<b>Test Details</b>
May 14, 2024	2004 Kia Amanti VIN # KNALD124645025868	TW997974C	Inspection performed by Respondent Chacon. TPS and MAF fluctuate to unfeasible degrees while engine speed held steady at around 725 RPM and 2035 RPM. TPS and MAF had lower data points during elevated engine RPM stage of inspection than at idle.
May 15, 2024	2007 Toyota Corolla CE VIN # JTDBR32E370133502	TW997986C	Inspection performed by Respondent Chacon. TPS and MAF fluctuate to unfeasible degrees while engine speed held steady at around 660 RPM and 1815 RPM. TPS and MAF had lower data points during elevated engine RPM stage of inspection than at idle.
May 16, 2024	2005 Toyota Rav4 VIN # JTEGD20V350069343	TW997989C	Inspection performed by Respondent Chacon. TPS and MAF fluctuate to unfeasible degrees while engine speed held steady at around 680 RPM and 1620 RPM. MAF had lower data points during elevated engine RPM stage of inspection than at idle.

1 2 3 4 5 6 7	September 5, 2024	2000 Ford Mustang VIN # 1FAFP4047YF109103	TY197932C	Inspection performed by Respondent Chacon. TPS and MAF fluctuate to unfeasible degrees while engine speed held steady at around 800 RPM and 2315 RPM. TPS had lower data points during elevated engine RPM stage of inspection than at idle.
8 9 10 11 12 13 14	September 18, 2024	2004 Toyota Sienna XLE, VIN # 5TDBA22C64S026470	UE004572C	Inspection performed by Respondent Chacon. TPS and MAF fluctuate to unfeasible degrees while engine speed held steady at around 585 RPM and 1798 RPM. TPS and MAF had lower data points during elevated engine RPM stage of inspection than at idle.
15 16 17 18 19 20 21	September 30, 2024	2006 Toyota Corolla CE VIN # 1NXBR32E36Z589891	JB316903C	Inspection performed by Respondent Chacon. TPS and MAF fluctuate to unfeasible degrees while engine speed held steady at around 685 RPM and 2030 RPM. TPS had lower data points during elevated engine RPM stage of inspection than at idle.
22 23 24 25 26 27 28	October 12, 2024	2000 Chevrolet Silverado C1500 VIN # 1GCEC14WXYZ181035	UE539258C	Inspection performed by Respondent Chacon. TPS, MAP and MAF fluctuate to unfeasible degrees while engine speed held steady at around 770 RPM and 1825 RPM. TPS and MAF had lower data points during elevated engine RPM stage of inspection than at idle.

1 2 3 4 5 6 7	October 16, 2024	2002 Ford F150 VIN # 1FTRX17262NB91445	UE539270C	Inspection performed by Respondent Chacon. TPS and MAF fluctuate to unfeasible degrees while engine speed held steady at around 770 RPM and 2015 RPM. TPS and MAF had lower data points during elevated engine RPM stage of inspection than at idle.
8 9 10 11 12 13	November 8, 2024	2003 Acura RSX Type-S VIN # JH4DC530X3C001630	UE539277C	Inspection performed by Respondent Chacon. TPS and MAP fluctuate to unfeasible degrees while engine speed held steady at around 720 RPM and 1640 RPM. TPS had lower data points during elevated engine RPM stage of inspection than at idle.
14 15 16 17 18 19 20 21	November 19, 2024	2001 Ford F150 VIN # 1FTZX172X1KF52160	UE539286C	Inspection performed by Respondent Chacon. TPS and MAF fluctuate to unfeasible degrees while engine speed held steady at around 880 RPM and 1970 RPM. TPS and MAF had lower data points during elevated engine RPM stage of inspection than at idle.

**FIRST CAUSE FOR DISCIPLINE**

**(Misleading Statements – Automotive Repair Dealer Registration)**

36. Respondent Rivas-Santamaria has subjected his registration to discipline under BPC section 9884.7, subdivision (a)(1), in that Respondent made statements which were known to be untrue or misleading or, which by exercise of reasonable care should have been known to be untrue or misleading, by engaging in clean plugging and issuing the electronic smog certificates of compliance for the vehicles set forth in Table 1, above, certifying that those vehicles were in

1 compliance with applicable laws and regulations when, in fact, those vehicles had not been so  
2 inspected. Complainant refers to, and by this reference incorporates, the allegations contained in  
3 paragraphs 33 through 35, inclusive, as though set forth fully herein.

4 **SECOND CAUSE FOR DISCIPLINE**

5 **(Fraud - Automotive Repair Dealer Registration)**

6 37. Respondent Rivas-Santamaria has subjected his registration to discipline under BPC  
7 section 9884.7, subdivision (a)(4), in that Respondent committed acts which constitute fraud by  
8 issuing electronic smog certificates of compliance for the vehicles set forth in Table 1, above,  
9 without performing bona fide inspections of the emission control devices and systems on those  
10 vehicles, thereby depriving the People of the State of California of the protection afforded by the  
11 Motor Vehicle Inspection Program. Complainant refers to, and by this reference incorporates, the  
12 allegations contained in paragraphs 33 through 35, inclusive, as though set forth fully herein.

13 **THIRD CAUSE FOR DISCIPLINE**

14 **(Material Violation of Automotive Repair Act  
15 - Automotive Repair Dealer Registration)**

16 38. Respondent Rivas-Santamaria has subjected his registration to discipline under BPC  
17 section 9884.7, subdivision (a)(6), in that Respondent failed in a “material respect to comply with  
18 the provisions of this chapter or regulations adopted pursuant to it” by issuing electronic smog  
19 certificates of compliance for the vehicles set forth in Table 1, above, without performing bona  
20 fide inspections of the emission control devices and systems on those vehicles, thereby depriving  
21 the People of the State of California of the protection afforded by the Motor Vehicle Inspection  
22 Program. Complainant refers to, and by this reference incorporates, the allegations contained in  
23 paragraphs 33 through 35, inclusive, as though set forth fully herein.

24 **FOURTH CAUSE FOR DISCIPLINE**

25 **(Violation of the Motor Vehicle Inspection Program  
26 - Smog Check Station License)**

27 39. Respondent Rivas-Santamaria has subjected his station license to discipline under  
28 HSC section 44072.2, subdivision (a), in that, with respect to the vehicles set forth in Table 1,  
above, Respondent violated the following sections of the HSC:



1 of the emission control devices and systems on those vehicles, thereby depriving the People of the  
2 State of California of the protection afforded by the Motor Vehicle Inspection Program.  
3 Complainant refers to, and by this reference incorporates, the allegations contained in paragraphs  
4 33 through 35, inclusive, as though set forth fully herein.

5 **SEVENTH CAUSE FOR DISCIPLINE**

6 **(Violation of the Motor Vehicle Inspection Program –  
7 Smog Check Inspector License)**

8 42. Respondent Chacon has subjected his smog check inspector license to discipline  
9 under HSC section 44072.2, subdivision (a), in that, with respect to 1 the vehicles set forth in  
10 Table 1, above, Respondent violated the following sections of the HSC:

11 a. **Section 44012:** Respondent failed to ensure that the onboard diagnostic system tests  
12 were performed on those vehicles in accordance with procedures prescribed by the department.

13 b. **Section 44015, subdivision (b):** Respondent issued electronic smog certificates of  
14 compliance to the vehicles set forth in Table 1 without properly testing and inspecting the  
15 vehicles to determine if they were in compliance with section 44012 of the HSC.

16 c. **Section 44032:** Respondent failed to perform tests of the onboard diagnostic systems  
17 on those vehicles in accordance with section 44012 of the HSC.

18 d. **Section 44059:** Respondent willfully made false entries for the electronic smog  
19 certificates of compliance by certifying that the vehicles set forth in Table 1 had been inspected as  
20 required when, in fact, they had not.

21 **EIGHTH CAUSE FOR DISCIPLINE**

22 **(Violations of Regulations Pursuant to the Motor Vehicle Inspection Program  
23 - Smog Check Inspector License)**

24 43. Respondent Chacon has subjected his smog check inspector license to discipline  
25 under HSC section 44072.2, subdivision (c), in that, with respect to the vehicles set forth in Table  
26 1, above, Respondent violated the following sections of title 16 of the CCR:

27 a. **Section 3340.24, subdivision (c):** Respondent falsely or fraudulently issued  
28 electronic smog certificates of compliance to the vehicles set forth in Table 1 without performing

1 bona fide inspections and functional testing of the emission control devices and systems on those  
2 vehicles as required by HSC section 44012.

3 b. **Section 3340.30, subdivision (a):** Respondent failed to inspect and test those  
4 vehicles in accordance with HSC section 44012.

5 c. **Section 3340.35, subdivision (c):** Respondent issued electronic smog certificates of  
6 compliance to the vehicles set forth in Table 1 even though those vehicles had not been inspected  
7 in accordance with section 3340.42 of the HSC.

8 d. **Section 3340.41, subdivision (c):** Respondent knowingly entered false information  
9 into the EIS about the vehicles being tested.

10 e. **Section 3340.42:** Respondent failed to conduct the required smog tests and  
11 inspections on those vehicles in accordance with the Bureau's specifications.

#### 12 **NINTH CAUSE FOR DISCIPLINE**

#### 13 **(Dishonesty, Fraud or Deceit - Smog Check Inspector License)**

14 44. Respondent Chacon has subjected his smog check inspector license to discipline  
15 under HSC section 44072.2, subdivision (d), and HSC section 44072.10, subdivision (c), in that,  
16 with respect to the vehicles set forth in Table 1, above, Respondent committed acts involving  
17 dishonesty, fraud or deceit whereby another was injured by issuing electronic smog certificates of  
18 compliance for those vehicles without performing bona fide inspections and functional testing of  
19 the emission control devices and systems on those vehicles, thereby depriving the People of the  
20 State of California of the protection afforded by the Motor Vehicle Inspection Program.  
21 Complainant refers to, and by this reference incorporates, the allegations contained in paragraphs  
22 33 through 35, inclusive, as though set forth fully herein.

#### 23 **OTHER MATTERS**

24 45. Section 9884.7, subdivision (c), of the BPC states that "the director may suspend,  
25 revoke, or place on probation the registration for all places of business operated in this state by an  
26 automotive repair dealer upon a finding that the automotive repair dealer has, or is, engaged in a  
27 course of repeated and willful violations of this chapter, or regulations adopted pursuant to."

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1 case, pursuant to Business and Professions Code section 125.3 and if placed on probation, the  
2 costs of probation monitoring; and

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

4  
5 DATED: As of digital signature date

6 PATRICK DORAIS  
7 Chief  
8 Bureau of Automotive Repair  
9 Department of Consumer Affairs  
10 State of California  
11 *Complainant*

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