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7

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

11 In the Matter of the Accusation Against:

Case No. 79/24-11141

12 **AMADOR CALDERON VALIENTE-**
13 **OWNER THE ROUTE 66 SMOG CHECK**
250 South Towne Avenue
Pomona, CA 91766
14 **Automotive Repair Dealer Registration No.**
ARD 303254
15 **Smog Check, Test-Only, Station License No.**
TC 303254

ACCUSATION

16 **JOSE ANGEL NOVOA GUTIERREZ**
17 **21205 Pala Foxia Pl.**
Moreno Valley, CA 92557
18 **Smog Check Inspector License No. EO**
644493

19 **and**

20 **VICTOR ANTONIO BONILLA-**
21 **ANGUIANO**
1190 Villa St. Apt. 2
22 **Riverside, CA 92507**
Smog Check Inspector License No. EO
23 **644341**

24 Respondents.

25
26 **PARTIES**

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

1 **Amador Calderon Valiente-Owner dba The Route 66 Smog Check**

2 **Automotive Repair Dealer Registration**

3 2. On or about August 10, 2022, the Bureau issued Automotive Repair Dealer
4 Registration Number ARD 303254 to Amador Calderon Valiente-Owner dba The Route 66 Smog
5 Check ("Respondent Route 66 Smog"). The Automotive Repair Dealer Registration was in full
6 force and effect at all times relevant to the charges brought herein and will expire on August 31,
7 2026, unless renewed.

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

9 3. On or about September 13, 2022, the Bureau issued Smog Check, Test-Only, Station
10 License Number TC 303254 to Respondent Route 66 Smog. The Smog Check, Test-Only,
11 Station License was in full force and effect at all times relevant to the charges brought herein and
12 will expire on August 31, 2026, unless renewed.

13 **STAR Station Certification**

14 4. On or about August 14, 2023, the Bureau certified Route 66 Smog Check as a STAR
15 Station and will remain active unless the ARD registration and/or Smog Check Station license
16 is revoked, canceled, licenses become delinquent, or the certification is suspended.

17 **Alex Urzua**

18 **Smog Check Inspector License/Smog Check Repair Technician License**

19 5. On or about September 20, 2016, the Bureau issued Smog Check Inspector License
20 Number EO 639699 to revoked Alex Urzua ("Inspector Urzua"), and it would have expired on
21 December 31, 2024; however, it was revoked on June 21, 2024. On or about September 19, 2016,
22 the Bureau issued Smog Check Repair Technician License Number EI 639699 to revoked
23 Inspector Urzua, and it would have expired on December 31, 2024; however, it was revoked on
24 June 21, 2024.

25 **Jose Angel Novoa Gutierrez**

26 **Smog Check Inspector License**

27 6. On or about August 18, 2023, the Bureau issued Smog Check Inspector License
28 Number EO 644493 to Jose Angel Novoa Gutierrez ("Respondent Gutierrez"). The Smog Check

Inspector License was always in full force and effect relevant to the charges brought herein and will expire on February 28, 2027, unless renewed.

Victor Antonio Bonilla-Anguiano

Smog Check Inspector License

7. On or about May 22, 2023, the Bureau issued Smog Check Inspector License Number EO 644341 to Victor Antonio Bonilla-Anguiano ("Respondent Anguiano"). The Smog Check Inspector License was in full force and effect at all times relevant to the charges brought herein and will expire on June 30, 2027, unless renewed.

JURISDICTION

8. Business and Professions Code ("Code") section 9884.7 provides that the Director may revoke an automotive repair dealer registration.

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

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

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

STATUTORY PROVISIONS

12. Section 9884.7 of the Code states:

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

member of the automotive repair dealer:

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

....

(4) Any other conduct that constitutes fraud.

....

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

....

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

13. 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.

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

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

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

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

....

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

15. Section 44032 of the Health and Safety Code states:

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

16. Section 44059 of the Health and Safety Code states:

The willful making of any false statement or entry with regard to a material matter in any oath, affidavit, certificate of compliance or noncompliance, or 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.

17. 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.

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

18. Section 44072.8 of the Health and Safety Code states:

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

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

(c) The department shall revoke the license of any smog check technician or 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 the following:

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

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

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

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

REGULATORY PROVISIONS

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

....

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

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

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

4 (a) Inspect, test and repair vehicles, as applicable, in accordance with section
5 44012 of the Health and Safety Code, section 44035 of the Health and
6 Safety Code, and section 3340.42 of this article..

6 22. California Code of Regulations, title 16, section 3340.35 states:

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

10 23. California Code of Regulations, title 16, section 3340.41 states:

11

12 (c) No person shall enter any vehicle identification information or emission
13 control system identification data for any vehicle other than the one being tested into
14 the EIS or OIS. Nor shall any person enter into the EIS or OIS any false information
15 about the vehicle being tested.

15 24. California Code of Regulations, title 16, section 3340.42, states:

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

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

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

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

(2) A two-speed idle mode test shall be the test method used to inspect 1976 -

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

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

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

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

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

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

(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 vehicle OBD systems.

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

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

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

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

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

(3) A gross polluting vehicle shall not be passed or issued a certificate of 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), as applicable. However, the provisions described in section 44017 of the Health and Safety Code may apply.

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

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

No automotive repair dealer or individual in charge shall, in filling out an estimate, invoice, or work order, or record required to be maintained by section 3340.15(f) 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 the tendency or effect thereby would be to mislead or deceive customers, prospective customers, or the public.

COST RECOVERY

26. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case, with failure of the licensee to comply subjecting the license to not being renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be included in a stipulated settlement.

FACTUAL ALLEGATIONS

27. During a Board Diagnostic Inspection System inspection ("OIS"), engine operating parameters are retrieved from the vehicle's OBD II system and recorded to the Vehicle Information Database ("VID"). This is accomplished during the functional portion of the OIS Smog Check Inspection by plugging the Data Acquisition Device ("DAD") into the vehicle's Diagnostic Link Connector ("DLC") when prompted by the OIS analyzer screen prompt. Some of the parameters recorded are:

- Engine speed in revolutions per minute ("RPM").
- 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 or up to 100% at full throttle.
- Manifold absolute pressure as measured by a manifold air pressure sensor ("MAP") connected to an intake manifold source, measured in kilo pascals ("kpa"). Typical readings for a normally aspirated engine are as follows: 0 kPa being absolute vacuum, 25kPa to 45kPa at idle, and 101 kpa at full throttle, same as atmospheric pressure at sea level.
- 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 ("gps").
- Ignition timing is set by the vehicle Powertrain Control Module ("PCM") based on engine speed and load and is measured in degrees Before Top Dead Center ("BTDC").

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1 28. During normal engine operation at idle, the engine speed is relatively steady around
2 its target idle speed. With the engine idling, the TPS is steady and at or near 0%. The MAP
3 and/or MAF readings are also steady. For the engine speed to increase, the throttle would have to
4 be opened to increase airflow through the engine. The engine's management systems supply fuel
5 and spark timing appropriate to any changes in throttle position and engine speed. An increase in
6 throttle, measured by the TPS, which increases engine RPM, would result in corresponding
7 increases in MAF as well as a change in MAP. Stated another way, any movement in the throttle
8 from the idle position will result in an increase of airflow through the engine with corresponding
9 increases in RPM and/or MAF along with changes in MAP.

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

16 30. The Bureau Representative conducted a detailed review of the VID data for the Smog
17 Check inspections performed at Respondent Route 66 Smog's facility. The review showed a
18 pattern of vehicles being certified with improbable engine operating parameters not
19 corresponding to normal engine operation. The data collected by the DAD during the OBDII
20 functional test confirmed that an OBD defeat device was used instead of the actual vehicle being
21 tested, which constitutes clean plugging¹. The Bureau Representative included fourteen (14)
22 vehicles in his report as examples of fraudulent inspections using clean plugging and one (1)
23 example of a fraudulent inspection using clean piping².

25 ¹ Clean Plugging" refers to the use of another vehicle's properly functioning On Board Diagnostic,
26 generation II, (OBD II) system, or another source, to generate passing diagnostic readings for the purpose of issuing
27 fraudulent smog Certificates of Compliance to vehicles that are not in smog compliance and/or not present for
28 testing.

27 ² "Clean piping" is sampling the (clean) tailpipe emissions and/or the RPM readings of another vehicle for
28 the purpose of illegally issuing smog certifications to vehicles that are not in compliance or are not present in the
smog check area during the time of the certification.

Fraudulent Inspection No. 1-2000 Honda Accord EX

31. A Bureau Representative reviewed the OIS Test Data for Respondent Route 66 Smog. The review indicated that on or about March 16, 2024, a 2000 Honda Accord EX was tested, and Certificate of Compliance Number TU113109C was issued by revoked Inspector Urzua.

32. The Dynamic OBD Data and Dynamic Data Charts data for the 2000 Honda Accord EX showed that between timestamps 871 and 19754, the engine speed was steady at approximately 800 RPM. During this time, the throttle was fixed at 9.4% opening, the MAP was fixed at 91 kPa, and the ignition timing advance for the number 1 cylinder was fixed at 0 degrees BTDC. After timestamp 19754, the engine speed accelerated to approximately 2300 RPM. From the time the engine RPM increased off idle to the higher RPMs, the throttle was fixed at the same 9.4% opening, the MAP was fixed at the same 91 kPa, and the ignition timing advance for the number 1 cylinder was fixed at the same 0 degrees BTDC.

33. During the entire period, the dynamic data was collected, the only parameter that changed was the engine RPM. The throttle position, the MAP, and the ignition timing advance readings remained unchanged even though the engine speed was increased. These readings were not characteristic or expected for normal engine operation. The discrepancies in the OIS Test Data proved that the OIS DAD was not connected to the 2000 Honda Accord EX being certified, which caused the issuance of a fraudulent Smog Check Certificate of Compliance.

Fraudulent Inspection No. 2-2000 Jeep Cherokee Sport

34. A Bureau Representative reviewed the OIS Test Data for Respondent Route 66 Smog. The review indicated that on or about June 19, 2024, a 2000 Jeep Cherokee Sport was tested, and Certificate of Compliance Number TU113126C was issued by revoked Inspector Urzua.

35. The Dynamic OBD Data and Dynamic Data Charts data for the 2000 Jeep Cherokee Sport showed that between timestamps 471 and 20362, the engine speed was steady at approximately 575 RPM. During this time, the throttle was fixed at 16.9% opening, the MAP was fixed at 42 kPa, and the ignition timing advance for the number 1 cylinder was fixed at 8

degrees BTDC. After timestamp 20362, the engine speed accelerated to approximately 1425 RPM. From the time the engine RPM increased off idle to the higher RPMs, the throttle was fixed at the same 16.9% opening, the MAP was fixed at the same 42 kPa, and the ignition timing advance for the number 1 cylinder was fixed at the same 8 degrees BTDC.

36. During the entire period, the dynamic data was collected, the only parameter that changed was the engine RPM. The throttle position, the MAP, and the ignition timing advance readings remained unchanged even though the engine speed was increased. These readings were not characteristic or expected for normal engine operation. The discrepancies in the OIS Test Data proved that the OIS DAD was not connected to the 2000 Jeep Cherokee Sport being certified, which caused the issuance of a fraudulent Smog Check Certificate of Compliance.

Previous Failing Tests: No. 2-2000 Jeep Cherokee Sport

37. Two previous failing tests were performed on the 2000 Jeep Cherokee Sport.

38. On or about June 6, 2024, the most recent test was performed at another station. The 2000 Jeep Cherokee Sport failed the inspection for incomplete OBDII readiness monitors. No dynamic data was collected during the inspection.

39. On or about June 4, 2024, the older failed test was performed at another station. The 2000 Jeep Cherokee Sport failed the inspection for incomplete OBDII readiness monitors. No dynamic data was collected during the inspection.

Fraudulent Inspection No. 3-2004 Lexus IS300

40. A Bureau Representative reviewed the OIS Test Data for Respondent Route 66 Smog. The review indicated that on or about June 20, 2024, a 2004 Lexus IS300 was tested, and Certificate of Compliance Number TU113132C was issued by revoked Inspector Urzua.

41. The Dynamic OBD Data and Dynamic Data Charts data for the 2004 Lexus IS300 showed that between timestamps 1095 and 23311, the engine speed was steady at approximately 875 RPM. During this time, the throttle was fixed at 14.5% opening, the MAF was fixed at 4.28 gps, and the ignition timing advance for the number 1 cylinder was fixed at 12.5 degrees BTDC. After timestamp 23311, the engine speed accelerated to approximately 1800 RPM. From the time the engine RPM increased off idle to the higher RPMs, the throttle was fixed at the same 14.5%

opening, the MAF was fixed at the same 4.28 gps, and the ignition timing advance for the number 1 cylinder was fixed at the same 12.5 degrees BTDC.

42. During the entire period, the dynamic data was collected, the only parameter that changed was the engine RPM. The throttle position, the MAF, and the ignition timing advance readings remained unchanged even though the engine speed was increased. These readings were not characteristic or expected for normal engine operation. The discrepancies in the OIS Test Data proved that the OIS DAD was not connected to the 2004 Lexus IS300 being certified, which caused the issuance of a fraudulent Smog Check Certificate of Compliance.

Previous Failing Tests: No. 3-2004 Lexus IS300

43. Two previous failing tests were performed on the 2004 Lexus IS300.

44. On or about February 6, 2024, the most recent test was performed at another station. The 2004 Lexus IS300 failed the inspection for an illuminated MIL and confirmed OBDII code P0456. No dynamic data was collected during the inspection.

45. On or about January 25, 2024, the older failed test was performed at another station. The 2004 Lexus IS300 failed the inspection for incomplete OBDII readiness monitors. No dynamic data was collected during the inspection.

Fraudulent Inspection No. 4-2005 Buick Lacrosse CX

46. A Bureau Representative reviewed the OIS Test Data for Respondent Route 66 Smog. The review indicated that on or about June 20, 2024, a 2005 Buick Lacrosse CX was tested, and Certificate of Compliance Number TU113136C was issued by revoked Inspector Urzua.

47. The Dynamic OBD Data and Dynamic Data Charts data for the 2005 Buick Lacrosse CX showed that between timestamps 396 and 17343, the engine speed was steady at approximately 700 RPM. During this time, the throttle was fixed at 0% opening, the MAF was fixed at 4.66 gps, the MAP was fixed at 30 kPa, and the ignition timing advance for the number 1 cylinder was fixed at 22.5 degrees BTDC. After timestamp 17343, the engine speed accelerated to approximately 1800 RPM. From the time the engine RPM increased off idle to the higher RPMs, the throttle was fixed at the same 0% opening, the MAF was fixed at the same 4.66 gps,

1 the MAP was fixed at the same 30 kPa, and the ignition timing advance for number 1 cylinder
2 was also still fixed at the same 22.5 degrees BTDC.

3 48. During the entire period, the dynamic data was collected, the only parameter that
4 changed was the engine RPM. The throttle position, the MAF, the MAP, and the ignition timing
5 advance readings remained unchanged even though the engine speed was increased. These
6 readings were not characteristic or expected for normal engine operation. The discrepancies in
7 the OIS Test Data proved that the OIS DAD was not connected to the 2005 Buick Lacrosse CX
8 being certified, which caused the issuance of a fraudulent Smog Check Certificate of Compliance.

9 **Previous Failing Tests: No. 4-2005 Buick Lacrosse CX**

10 49. Two previous failing tests were performed on the 2005 Buick Lacrosse CX.

11 50. On or about May 1, 2024, the most recent test was performed at another station. The
12 2005 Buick Lacrosse CX failed the inspection for a tampered catalyst. No dynamic data was
13 collected during the inspection.

14 51. On or about February 22, 2024, the older failed test was performed at another station.
15 The 2005 Buick Lacrosse CX failed the inspection for a tampered catalyst. The test detail also
16 indicated confirmed DTC P0340, but the vehicle's MIL was not illuminated. No dynamic data
17 was collected during the inspection.

18 **Fraudulent Inspection No. 5-2004 Chrysler PT Cruiser**

19 52. A Bureau Representative reviewed the OIS Test Data for Respondent Route 66
20 Smog. The review indicated that on or about June 20, 2024, a 2004 Chrysler PT Cruiser was
21 tested, and Certificate of Compliance Number TU113138C was issued by revoked Inspector
22 Urzua.

23 53. The Dynamic OBD Data and Dynamic Data Charts data for the 2004 Chrysler PT
24 Cruiser showed that between timestamps 392 and 19061, the engine speed was steady at
25 approximately 700 RPM. During this time, the throttle was fixed at 14.9% opening, the MAP
26 was fixed at 44 kPa, and the ignition timing advance for the number 1 cylinder was fixed at 16
27 degrees BTDC. After timestamp 19061, the engine speed accelerated to approximately 1500
28 RPM. From the time the engine RPM increased off idle to the higher RPMs, the throttle was

fixed at the same 14.9% opening, the MAP was fixed at the same 44 kPa, and the ignition timing advance for the number 1 cylinder was fixed at the same 16 degrees BTDC.

54. During the entire period, the dynamic data was collected, the only parameter that changed was the engine RPM. The throttle position, the MAP, and the ignition timing advance readings remained unchanged even though the engine speed was increased. These readings were not characteristic or expected for normal engine operation. The discrepancies in the OIS Test Data proved that the OIS DAD was not connected to the 2004 Chrysler PT Cruiser being certified, which caused the issuance of a fraudulent Smog Check Certificate of Compliance.

Previous Failing Tests: No. 5-2004 Chrysler PT Cruiser

55. On or about April 11, 2023, a previous failing test was performed at another station on the 2004 Chrysler PT Cruiser. The 2004 Chrysler PT Cruiser failed the inspection for incomplete OBDII readiness monitors. No dynamic data was collected during the inspection.

Surveillance/Station Inspection June 20, 2024

56. On or about June 20, 2024, Bureau Representative S.K. conducted a surveillance of Respondent Route 66 Smog's facility. The station operated out of a single unit testing bay in a multi-unit complex. There was enough room for one (1) vehicle in the testing bay and only one door for entrance and exit to the unit. Respondent Route 66 Smog's facility can only be observed from inside the complex.

57. Bureau Representative S.K. was assisted by Bureau Representatives R.G., A.R. and E.S. Prior to the surveillance, Bureau Representative S.K. showed Bureau Representatives R.G. and A.R. a photograph of revoked Inspector Urzua from the Bureau records and informed them that he was the only inspector assigned to Respondent Route 66 Smog's facility.

58. Bureau Representatives S.K., R.G., A.R. and E.S. arrived near the proximity of Respondent Route 66 Smog's facility at approximately 1640 hours. Bureau Representative S.K. monitored the only driveway to access the complex in one (1) vehicle while R.G., A.R. and E.S. were in another vehicle monitoring testing data and waiting for Bureau Representative S.K.'s instruction.

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1 59. The Bureau's database indicated a test on a 2002 Acura RSX was initiated on the OIS
2 analyzer at 1641 hours. While the test was in progress, Bureau Representative S.K. received a
3 notification that an OBDII defeat device was being used during the inspection.

4 60. The Bureau's database indicated a test on a 1999 Ford Expedition was initiated on the
5 BAR97 analyzer at 1645 hours while the test on the Acura RSX was still in progress. The Bureau
6 database indicated the test on the 2002 Acura RSX was completed at 1650 hours, and the vehicle
7 was certified.

8 61. The Bureau's database indicated a test on a 2006 Toyota Sienna was initiated at 1650
9 hours. While the test was in progress, Bureau Representative S.K. received a notification that an
10 OBDII defeat device was being used during the inspection. The inspection on the 2006 Sienna
11 was completed at 1701 hours. The vehicle had the certificate blocked.

12 62. At approximately 1705 hours, while Bureau Representative S.K. monitored the
13 driveway to the complex, Bureau Representatives R.G., A.R. and E.S. entered the complex and
14 were able to monitor Respondent Route 66 Smog's facility from the parking area. Bureau
15 Representatives R.G., A.R. and E.S. observed a black 2021 Chevrolet Silverado pickup,
16 California License Number 67223D3, parked perpendicular to the testing bay. The positioning of
17 the truck prevented any vehicles from entering or exiting the business and partially blocked the
18 view to the inside of the test bay. Bureau Representative R.G. confirmed he did not have a clear
19 view inside of the testing bay, but was certain an SUV was not present inside.

20 63. At 1709 hours, the Bureau's database indicated the test on the 1999 Ford Expedition
21 had been completed and the Expedition was certified. Bureau Representative S.K. instructed the
22 Bureau Representatives R.G., A.R. and E.S. to visit Respondent Route 66 Smog's facility,
23 perform an inspection, and collect any evidence.

24 64. Bureau Representative A.R. entered Respondent Route 66 Smog's facility first,
25 followed by Bureau Representatives R.G. and E.S. When they arrived, Bureau Representatives
26 R.G., A.R. and E.S. recognized revoked Inspector Urzua at Respondent Route 66 Smog's facility
27 with another male, who was sitting in the driver's seat of a 1996 Lincoln Continental, California
28 License Number 8PJL600, parked on the dynamometer. Bureau Representatives R.G., A.R. and

1 E.S. did not recognize the second individual. Bureau Representative R.G. photographed revoked
2 Inspector Urzua and the other male in the test bay.

3 65. Bureau Representatives A.R. and R.G. attempted to question revoked Inspector Urzua
4 about the 1999 Expedition he just certified. Revoked Inspector Urzua refused to answer any
5 questions and walked into the adjacent bay of another business. The other individual at
6 Respondent Route 66 Smog's facility refused to answer any questions and attempted to block
7 Bureau Representatives R.G., A.R. and E.S. from inspecting Respondent Route 66 Smog's
8 facility.

9 66. Bureau Representative S.K. arrived at the location approximately 1715 hours. When
10 Bureau Representative S.K. arrived, a black 2021 Chevrolet Silverado, California License
11 Number 67223D3, was parked perpendicular to the testing bay, blocking any vehicle from
12 entering or exiting. As Bureau Representative S.K. walked into the testing bay to perform an
13 inspection, revoked Inspector Urzua had already left. Bureau Representative S.K. recognized the
14 other individual at the station as Robert Perez/Roberto Silva Perez ("Perez"). Bureau
15 Representative S.K. had prior contact with Perez at other stations that Bureau Representative S.K.
16 investigated for fraudulent smog check activity. Perez was previously licensed as a Smog Check
17 Inspector Number EO634504 and had his license revoked. Perez, who was agitated, was verbally
18 abusive and stated the shop was closed, demanding that Bureau Representatives S.K., R.G., A.R.
19 and E.S. leave.

20 67. Bureau Representative S.K. informed Perez that they had the right to inspect the
21 Respondent Route 66 Smog's facility since it was open for business. Bureau Representative S.K.
22 briefly entered the testing bay and took photographs. There was a stack of several unsigned
23 Vehicle Inspection Reports ("VIR") for inspections performed earlier in the day and the day prior,
24 but the station had no corresponding invoices. There were no documents for the test just
25 performed on the 1999 Ford Expedition. Perez stated he was closing the station and threatened to
26 close the door on anyone inside.

27 68. Bureau Representative S.K. questioned Perez about whether he was the station
28 manager of Respondent Route 66 Smog's facility. Perez stated he had nothing to do with the

1 business but wouldn't explain why he was at Respondent Route 66 Smog's facility. Bureau
2 Representative S.K. exited the station and completed a station inspection report documenting his
3 findings. Bureau Representative S.K. was unable to print the inspection report while at the
4 station and later attempted to e-mail a copy of the report to Respondent Route 66 Smog's Owner
5 Amador Calderon Valiente ("Valiente"), but the e-mail in the Bureau's records was not valid.

6 69. Bureau Representative S.K. informed Perez that the station's analyzers were being
7 locked until he could meet with the station owner and that he could pass the information to
8 revoked Inspector Urzua. Bureau Representatives S.K., R.G., A.R. and E.S. left Respondent
9 Route 66 Smog's facility at approximately 1800 hours. The Bureau Representatives R.G., A.R.
10 and E.S. later completed declarations of their station visit.

11 70. Bureau Representative S.K. later received Department of Motor Vehicles' records
12 stating that the Lincoln Continental was registered to revoked Inspector Urzua, and the 2021
13 Chevrolet Silverado pickup was registered to Perez.

14 71. On or about June 20, 2024, Bureau Representative S.K. returned to the Riverside
15 Field Office and downloaded the OIS and BAR97 Test Summary for all tests performed at
16 Respondent Route 66 Smog's facility. Bureau Representative S.K. also printed the BAR97 Test
17 Detail for the test performed on the 1999 Ford Expedition. The information for the inspection
18 was presented in the form of a summary, which showed the following information:

- 19 • Analyzer number;
- 20 • Number of the Licensed Smog Check Inspector who purportedly conducted the test;
- 21 • Date of the test;
- 22 • Start and end times of the test;
- 23 • Vehicle type and vehicles purportedly tested identified by vehicle year, vehicle make,
24 vehicle type, license number, vehicle identification number ("VIN"), test results;
- 25 • Test type;
- 26 • Fuel type;
- 27 • Inspection reason;
- 28 • Certificate number (if issued);
- Overall test result;
- Visual, functional, and OBDII result; and
- Emissions result (If applicable).

72. The summary continued with the Acceleration Simulation Mode ("ASM") 5015
emissions readings and the ASM 2525 emissions readings, if applicable. The ASM utilizes the

dynamometer, as opposed to the two-speed idle test (“TSI”), which measures tailpipe emissions at two engine speeds with the vehicle static. The TSI test is primarily used for heavy-duty (over 9999-lbs. gross vehicle weight rating) vehicles, vehicles with full-time traction control, or full-time four-wheel drive vehicles.

73. Bureau Representative S.K. compared the BAR97 test details to the observations of Bureau Representatives R.G., A.R., E.S. and himself. Bureau Representative S.K. noted the following discrepancy:

Fraudulent Inspection No. 6-1999 Ford Expedition

74. On or about June 20, 2024, the BAR97 Test Detail showed that between 1645 and 1709 hours, a 1999 Ford Expedition was tested and issued Certificate of Compliance Number TY790590C that was issued by revoked Inspector Urzua. During the time the 1999 Ford Expedition was certified, it was not present at the station. During the inspection, a 1996 Lincoln Continental, California License Number 7UAA686, registered to revoked Inspector Urzua, was observed in the testing bay.

75. On or about June 20, 2024, the Bureau’s records showed that the 1996 Continental was tested twice at Respondent Route 66 Smog’s facility. The Continental failed the first inspection and passed the second inspection conducted earlier in the day.

Meeting With Respondent Route 66 Smog’s Owner Amador Calderon Valiente-June 21, 2024

76. On or about June 21, 2024, the Bureau Representative met with Valiente at the Riverside Field Office to discuss testing data and the visit to his station on or about June 20, 2024. The Bureau Representative informed Valiente that the Bureau had evidence that a 1999 Ford Expedition was fraudulently certified at his station by revoked Inspector Urzua.

77. Valiente stated he was unaware of what was happening at his station, and the Route 66 Smog Check was a side business. Valiente stated he was a full-time electrician but was familiar with how a smog check station operated. Valiente stated he met revoked Inspector Urzua about a year prior and trusted him to properly manage and run his business. Valiente stated he

1 didn't have any other employees managing his business and didn't know of anyone named
2 Roberto Silva Perez.

3 78. The Bureau Representative informed Valiente that he was responsible for activity at
4 his station, and they discussed ways to better monitor his business to ensure compliance with
5 Smog Check testing regulations. Valiente stated that revoked Inspector Urzua no longer worked
6 for him and requested that he be removed from the station. Valiente stated he was currently
7 looking for a replacement technician.

8 79. The Bureau Representative informed Valiente that he or his employees were to grant
9 the Bureau access to inspect his station anytime the station was testing vehicles or during normal
10 business hours.

11 80. The Bureau Representative requested all estimates, invoices, and VIRs for all
12 inspections performed at his station since June 1, 2024. The Bureau Representative informed
13 Valiente that he could bring the records to the Riverside Field Office or make arrangements for a
14 representative to get the records by June 27, 2024.

15 81. Valiente stated he understood everything that was discussed during the meeting, and
16 compliance with the Automotive Repair Act was mandatory. The Bureau Representative
17 informed Valiente that failure to comply with regulations was grounds for disciplinary action.
18 The Bureau Representative completed a station inspection report documenting their meeting,
19 which they both signed and dated. The Bureau Representative gave a copy to Valiente.

20 **Additional Data Review**

21 82. After the Bureau Representative met with Valiente, the Bureau Representative
22 continued to monitor station testing data. On or about July 17, 2024, Respondent Gutierrez was
23 added to Respondent Route 66 Smog as the licensed smog inspector. On or about September 25,
24 2024, Respondent Anguiano was added to Respondent Route 66 Smog as the licensed smog
25 inspector. Testing data showed that Respondents Gutierrez and Anguiano were also using an
26 OBDII defeat device to perform fraudulent Smog Check inspections.

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Fraudulent Inspection No. 7-2002 Toyota Camry LE

83. A Bureau Representative reviewed the OIS Test Data for Respondent Route 66 Smog. The review indicated that on or about August 8, 2024, a 2002 Toyota Camry LE was tested, and Certificate of Compliance Number UC257464C was issued by Respondent Gutierrez.

84. The Dynamic OBD Data and Dynamic Data Charts data for the 2002 Toyota Camry LE showed that between timestamps 1002 and 26643, the engine speed was steady at approximately 700 RPM. During this time, the throttle was fixed at 15.7% opening, the MAF was fixed at 3.1 gps, and the ignition timing advance for the number 1 cylinder was fixed at 9 degrees BTDC. After timestamp 26643, the engine speed accelerated to approximately 1900 RPM. From the time the engine RPM increased off idle to the higher RPMs, the throttle was fixed at the same 15.7% opening, the MAF was fixed at the same 3.1 gps, and the ignition timing advance for the number 1 cylinder was fixed at the same 9 degrees BTDC.

85. During the entire period, the dynamic data was collected, the only parameter that changed was the engine RPM. The throttle position, the MAF, and the ignition timing advance readings remained unchanged even though the engine speed was increased. These readings were not characteristic or expected for normal engine operation. The discrepancies in the OIS Test Data proved that the OIS DAD was not connected to the 2002 Toyota Camry LE being certified, which caused the issuance of a fraudulent Smog Check Certificate of Compliance.

Previous Failing Tests: No. 7-2002 Toyota Camry LE

86. On or about April 30, 2024, a previous failing test was performed at another station on the 2002 Toyota Camry LE. The 2002 Camry LE failed the inspection for an illuminated MIL, confirmed diagnostic trouble codes P1135 and P1155, and incomplete OBDII readiness monitors. The Dynamic OBDII PID data collected during the test showed that the expected change in the throttle, MAF, and ignition timing advance parameters as characteristic or expected for normal engine operation.

Fraudulent Inspection No. 8-2000 Chevrolet Silverado C1500

87. A Bureau Representative reviewed the OIS Test Data for Respondent Route 66 Smog. The review indicated that on or about August 8, 2024, a 2000 Chevrolet Silverado C1500

1 was tested, and Certificate of Compliance Number UC257465C was issued by Respondent
2 Gutierrez.

3 88. The Dynamic OBD Data and Dynamic Data Charts data for the 2000 Chevrolet
4 Silverado C1500 showed that between timestamps 447 and 23414, the engine speed was steady at
5 approximately 750 RPM. During this time, the throttle was fixed at .4% opening, the MAF was
6 fixed at 6.76 gps, the MAP was fixed at 38 kPa, and the ignition timing advance for the number 1
7 cylinder was fixed at 19.5 degrees BTDC. After timestamp 23414, the engine speed accelerated
8 to approximately 1500 RPM. From the time the engine RPM increased off idle to the higher
9 RPMs, the throttle was fixed at the same .4% opening, the MAF was fixed at the same 6.76 gps,
10 the MAP was fixed at the same 38 kPa, and the ignition timing advance for the number 1 cylinder
11 was fixed at the same 19.5 degrees BTDC.

12 89. During the entire period, the dynamic data was collected, the only parameter that
13 changed was the engine RPM. The throttle position, the MAF, the MAP, and the ignition timing
14 advance readings remained unchanged even though the engine speed was increased. These
15 readings were not characteristic or expected for normal engine operation. The discrepancies in
16 the OIS Test Data proved that the OIS DAD was not connected to the 2000 Chevrolet Silverado
17 C1500 being certified, which caused the issuance of a fraudulent Smog Check Certificate of
18 Compliance.

19 **Previous Failing Tests: No. 8-2000 Chevrolet Silverado C1500**

20 90. On or about July 31, 2024, a previous failing test was performed on the 2000
21 Chevrolet Silverado C1500 by Respondent Gutierrez at Respondent Route 66 Smog's facility.
22 The 2000 Chevrolet Silverado C1500 failed the inspection for incomplete OBDII readiness
23 monitors. The Dynamic OBDII PID data collected during the test showed that the expected
24 change in the throttle, the MAF, the MAP, and ignition timing advance parameters as
25 characteristic or expected for normal engine operation.

26 **Fraudulent Inspection No. 9-2003 Chevrolet Avalanche C1500**

27 91. A Bureau Representative reviewed the OIS Test Data for Respondent Route 66
28 Smog. The review indicated that on or about August 9, 2024, a 2003 Chevrolet Avalanche C1500

1 was tested, and Certificate of Compliance Number UC257471C was issued by Respondent
2 Gutierrez.

3 92. The Dynamic OBD Data and Dynamic Data Charts data for the 2003 Chevrolet
4 Avalanche C1500 showed that between timestamps 388 and 21687, the engine speed was steady
5 at approximately 600 RPM. During this time, the throttle was fixed at 14.9% opening, the MAF
6 was fixed at 3.86 gps, the MAP was fixed at 34 kPa, and the ignition timing advance for the
7 number 1 cylinder was fixed at 18 degrees BTDC. After timestamp 21687, the engine speed
8 accelerated to approximately 1725 RPM. From the time the engine RPM increased off idle to the
9 higher RPMs, the throttle was fixed at the same 14.9% opening, the MAF was fixed at the same
10 3.86 gps, the MAP was fixed at the same 34 kPa, and the ignition timing advance for the number
11 1 cylinder was fixed at the same 18 degrees BTDC.

12 93. During the entire period, the dynamic data was collected, the only parameter that
13 changed was the engine RPM. The throttle position, the MAF, the MAP, and the ignition timing
14 advance readings remained unchanged even though the engine speed was increased. These
15 readings were not characteristic or expected for normal engine operation. The discrepancies in
16 the OIS Test Data proved that the OIS DAD was not connected to the 2003 Chevrolet Avalanche
17 C1500 being certified, which caused the issuance of a fraudulent Smog Check Certificate of
18 Compliance.

19 **Previous Failing Tests: No. 9-2003 Chevrolet Avalanche C1500**

20 94. On or about August 28, 2023, a previous failing test was performed on the 2003
21 Chevrolet Avalanche C1500 at another station. The 2003 Chevrolet Avalanche C1500 failed the
22 inspection for the visual inspection (Crankcase Emission Controls and Other Emission Related
23 Components/Systems), an illuminated MIL, incomplete OBDII readiness monitors, and
24 confirmed OBDII DTCs P0102 and P0300. No Dynamic OBDII PID data was collected during
25 the test.

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Fraudulent Inspection No. 10-2004 Ford Escape XLT

95. A Bureau Representative reviewed the OIS Test Data for Respondent Route 66 Smog. The review indicated that on or about August 9, 2024, a 2004 Ford Escape XLT was tested, and Certificate of Compliance Number UC257474C was issued by Respondent Gutierrez.

96. The Dynamic OBD Data and Dynamic Data Charts data for the 2004 Ford Escape XLT showed that between timestamps 382 and 18334, the engine speed was steady at approximately 625 RPM. During this time, the throttle was fixed at 20.8% opening, the MAF was fixed at .42 gps, and the ignition timing advance for the number 1 cylinder was fixed at 0 degrees BTDC. After timestamp 18334, the engine speed accelerated to approximately 1900 RPM. From the time the engine RPM increased off idle to the higher RPMs, the throttle was fixed at the same 20.8% opening, the MAF was fixed at the same .42 gps, and the ignition timing advance for the number 1 cylinder was fixed at the same 0 degrees BTDC.

97. During the entire period, the dynamic data was collected, the only parameter that changed was the engine RPM. The throttle position, the MAF, and the ignition timing advance readings remained unchanged even though the engine speed was increased. These readings were not characteristic or expected for normal engine operation. The discrepancies in the OIS Test Data proved that the OIS DAD was not connected to the 2004 Ford Escape XLT being certified, which caused the issuance of a fraudulent Smog Check Certificate of Compliance.

Fraudulent Inspection No. 11-2005 Dodge RAM 1500 ST

98. A Bureau Representative reviewed the OIS Test Data for Respondent Route 66 Smog. The review indicated that on or about August 14, 2024, a 2005 Dodge RAM 1500 ST was tested, and Certificate of Compliance Number UC257490C was issued by Respondent Gutierrez.

99. The Dynamic OBD Data and Dynamic Data Charts data for the 2005 Dodge RAM 1500 ST showed that between timestamps 373 and 21118, the engine speed was steady at approximately 550 RPM. During this time, the throttle was fixed at 11% opening, the MAP was fixed at 91 kPa, and the ignition timing advance for the number 1 cylinder was fixed at -64 degrees BTDC. After timestamp 21118, the engine speed accelerated to approximately 1700 RPM. From the time the engine RPM increased off idle to the higher RPMs, the throttle was

fixed at the same 11% opening, the MAP was fixed at the same 91 kPa, and the ignition timing advance for the number 1 cylinder was fixed at the same -64 degrees BTDC.

100. During the entire period, the dynamic data was collected, the only parameter that changed was the engine RPM. The throttle position, the MAP, and the ignition timing advance readings remained unchanged even though the engine speed was increased. These readings were not characteristic or expected for normal engine operation. The discrepancies in the OIS Test Data proved that the OIS DAD was not connected to the 2005 Dodge RAM 1500 ST being certified, which caused the issuance of a fraudulent Smog Check Certificate of Compliance.

Fraudulent Inspection No. 12-2002 Lexus IS 300

101. A Bureau Representative reviewed the OIS Test Data for Respondent Route 66 Smog. The review indicated that on or about September 26, 2024, a 2002 Lexus IS 300 was tested, and Certificate of Compliance Number IZ901885C was issued by Respondent Anguiano.

102. The Dynamic OBD Data and Dynamic Data Charts data for the 2002 Lexus IS 300 showed that between timestamps 992 and 21256, the engine speed was steady at approximately 675 RPM. During this time, the throttle was fixed at 16.1% opening, the MAF was fixed at 4.87 gps, and the ignition timing advance for the number 1 cylinder was fixed at 12.5 degrees BTDC. After timestamp 21256, the engine speed accelerated to approximately 2050 RPM. From the time the engine RPM increased off idle to the higher RPMs, the throttle was fixed at the same 16.1% opening, the MAF was fixed at the same 4.87 gps, and the ignition timing advance for the number 1 cylinder was fixed at the same 12.5 degrees BTDC.

103. During the entire period, the dynamic data was collected, the only parameter that changed was the engine RPM. The throttle position, the MAF, and the ignition timing advance readings remained unchanged even though the engine speed was increased. These readings were not characteristic or expected for normal engine operation. The discrepancies in the OIS Test Data proved that the OIS DAD was not connected to the 2002 Lexus IS 300 being certified, which caused the issuance of a fraudulent Smog Check Certificate of Compliance.

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Previous Failing Tests: No. 12-2002 Lexus IS 300

104. On or about August 28, 2024, a previous failing test was performed on the 2002 Lexus IS 300 at another station in the city of Fresno. The 2002 Lexus IS 300 failed the inspection for incomplete OBDII readiness monitors. The Dynamic OBDII PID data collected during the test showed that the expected change in the throttle, the MAF, and ignition timing advance parameters as characteristic or expected for normal engine operation.

Fraudulent Inspection No. 13-2003 Chevrolet Tahoe K1500

105. A Bureau Representative reviewed the OIS Test Data for Respondent Route 66 Smog. The review indicated that on or about September 26, 2024, a 2003 Chevrolet Tahoe K1500 was tested, and Certificate of Compliance Number IZ901888C was issued by Respondent Anguiano.

106. The Dynamic OBD Data and Dynamic Data Charts data for the 2003 Chevrolet Tahoe K1500 showed that between timestamps 390 and 19539, the engine speed was steady at approximately 525 RPM. During this time, the throttle was fixed at 11.4% opening, the MAF was fixed at 5.21 gps, the MAP was fixed at 35 kPa, and the ignition timing advance for the number 1 cylinder was fixed at 16.5 degrees BTDC. After timestamp 19539, the engine speed accelerated to approximately 1800 RPM. From the time the engine RPM increased off idle to the higher RPMs, the throttle was fixed at the same 11.4% opening, the MAF was fixed at the same 5.21 gps, the MAP was fixed at the same 35 kPa, and the ignition timing advance for the number 1 cylinder was fixed at the same 16.5 degrees BTDC.

107. During the entire period, the dynamic data was collected, the only parameter that changed was the engine RPM. The throttle position, the MAF, the MAP, and the ignition timing advance readings remained unchanged even though the engine speed was increased. These readings were not characteristic or expected for normal engine operation. The discrepancies in the OIS Test Data proved that the OIS DAD was not connected to the 2003 Chevrolet Tahoe K1500 being certified, which caused the issuance of a fraudulent Smog Check Certificate of Compliance.

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1 **Previous Failing Tests: No. 13-2003 Chevrolet Tahoe K1500**

2 108. On or about August 6, 2024, a previous failing test was performed on the 2003
3 Chevrolet Tahoe K1500 at another station in the city of Fresno. The 2003 Chevrolet Tahoe
4 K1500 failed the inspection for the functional smoke test. No Dynamic OBDII PID data was
5 collected during the test.

6 **Fraudulent Inspection No. 14-2007 Pontiac Grand Prix**

7 109. A Bureau Representative reviewed the OIS Test Data for Respondent Route 66
8 Smog. The review indicated that on or about September 26, 2024, a 2007 Pontiac Grand Prix was
9 tested, and Certificate of Compliance Number IZ901890C was issued by Respondent Anguiano.

10 110. The Dynamic OBD Data and Dynamic Data Charts data for the 2007 Pontiac Grand
11 Prix showed that between timestamps 360 and 19997, the engine speed was steady at
12 approximately 800 RPM. During this time, the throttle was fixed at 15.7% opening, the MAF
13 was fixed at 6.1 gps, the MAP was fixed at 37 kPa, and the ignition timing advance for the
14 number 1 cylinder was fixed at 20 degrees BTDC. After timestamp 19997, the engine speed
15 accelerated to approximately 1900 RPM. From the time the engine RPM increased off idle to the
16 higher RPMs, the throttle was fixed at the same 15.7% opening, the MAF was fixed at the same
17 6.1 gps, the MAP was fixed at the same 37 kPa, and the ignition timing advance for the number 1
18 cylinder was fixed at the same 20 degrees BTDC.

19 111. During the entire period, the dynamic data was collected, the only parameter that
20 changed was the engine RPM. The throttle position, the MAF, the MAP, and the ignition timing
21 advance readings remained unchanged even though the engine speed was increased. These
22 readings were not characteristic or expected for normal engine operation. The discrepancies in
23 the OIS Test Data proved that the OIS DAD was not connected to the 2007 Pontiac Grand Prix
24 being certified, which caused the issuance of a fraudulent Smog Check Certificate of Compliance.

25 **Previous Failing Tests: No. 14-2007 Pontiac Grand Prix**

26 112. On or about June 5, 2024, a previous failing test was performed on the 2007 Pontiac
27 Grand Prix at another station. The 2007 Pontiac Grand Prix failed the inspection for an
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1 illuminated MIL, incomplete OBDII readiness monitors, and stored OBDII DTCs P0118, P0499,
2 and P0455. No Dynamic OBDII PID data was collected during the test. test.

3 **Fraudulent Inspection No. 15-2000 Chevrolet Suburban C1500**

4 113. A Bureau Representative reviewed the OIS Test Data for Respondent Route 66
5 Smog. The review indicated that on or about September 26, 2024, a 2000 Chevrolet Suburban
6 C1500 was tested, and Certificate of Compliance Number IZ901893C was issued by Respondent
7 Anguiano.

8 114. The Dynamic OBD Data and Dynamic Data Charts data for the 2000 Chevrolet
9 Suburban C1500 showed that between timestamps 363 and 19848, the engine speed was steady at
10 approximately 550 RPM. During this time, the throttle was fixed at 4.7% opening, the MAF was
11 fixed at 4.9 gps, the MAP was fixed at 34 kPa, and the ignition timing advance for the number 1
12 cylinder was fixed at 23 degrees BTDC. After timestamp 19848, the engine speed accelerated to
13 approximately 1825 RPM. From the time the engine RPM increased off idle to the higher RPMs,
14 the throttle was fixed at the same 4.7% opening, the MAF was fixed at the same 4.9 gps, the MAP
15 was fixed at the same 37 kPa, and the ignition timing advance for the number 1 cylinder was
16 fixed at the same 23 degrees BTDC.

17 115. During the entire period, the dynamic data was collected, the only parameter that
18 changed was the engine RPM. The throttle position, the MAF, the MAP, and the ignition timing
19 advance readings remained unchanged even though the engine speed was increased. These
20 readings were not characteristic or expected for normal engine operation. The discrepancies in
21 the OIS Test Data proved that the OIS DAD was not connected to the 2000 Chevrolet Suburban
22 C1500 being certified, which caused the issuance of a fraudulent Smog Check Certificate of
23 Compliance.

24 **FIRST CAUSE FOR DISCIPLINE**

25 **(Untrue or Misleading Statements)**

26 116. Respondent Route 66 Smog's Automotive Repair Registration is subject to discipline
27 pursuant to Code section 9884.7, subdivision (a)(1) and California Code of Regulations, title 16,
28 section 3373, in that between March 16, 2024, through September 26, 2024, Respondent Route 66

Smog made or authorized statements which he knew or in the exercise of reasonable care should have known to be untrue or misleading, as follows: Respondent Route 66 Smog certified that vehicles 1 through 15, set forth above, had passed inspection and were in compliance with applicable laws and regulations. Respondent Route 66 Smog conducted the inspections on the vehicles using the clean plugging method by substituting or using different vehicles or another source during the OBD II functional tests to issue smog certificates of compliance for the fourteen (14) vehicles and using the clean piping method in order to issue smog certificate of compliance for one (1) vehicle and did not test or inspect the fifteen (15) vehicles as required by Health and Safety Code section 44012. Complainant refers to, and by this reference incorporates, the allegations set forth above in paragraphs 27 through 115, as though fully set forth.

SECOND CAUSE FOR DISCIPLINE

(Fraud)

117. Respondent Route 66 Smog's Automotive Repair Registration is subject to discipline pursuant to Code section 9884.7, subdivision (a)(4), in that between March 16, 2024, through September 26, 2024, Respondent Route 66 Smog committed acts that constitute fraud by issuing electronic smog certificates of compliance for vehicles 1 through 15, set forth above, without performing bona fide inspections of the emission control devices and systems on those vehicles, thereby depriving the People of the State of California of the protection afforded by the Motor Vehicle Inspection Program. Complainant refers to, and by this reference incorporates, the allegations set forth above in paragraphs 27 through 115, as though fully set forth.

THIRD CAUSE FOR DISCIPLINE

(Material Violation of Automotive Repair Act)

118. Respondent Route 66 Smog's Automotive Repair Registration is subject to disciplinary action under Code section 9884.7, subdivision (a)(6), in that between March 16, 2024, through September 26, 2024, regarding vehicles 1 through 15, set forth above, Respondent Route 66 Smog failed in a material respect to comply with the provisions of this chapter or regulations adopted pursuant to it by issuing electronic smog certificates of compliance for the fifteen (15) vehicles without performing bona fide inspections of the emissions control devices

1 and systems on those vehicles, thereby depriving the People of the State of California of the
2 protection afforded by the Motor Vehicle Inspection Program. Complainant refers to, and by this
3 reference incorporates, the allegations set forth above in paragraphs 27 through 115, as though
4 fully set forth.

5 **FOURTH CAUSE FOR DISCIPLINE**

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

7 119. Respondent Route 66 Smog's Smog Check, Test Only Station License is subject to
8 discipline pursuant to Health and Safety Code section 44072.2, subdivision (a), in that between
9 March 16, 2024, through September 26, 2024, regarding vehicles 1 through 15, set forth above,
10 Respondent Route 66 Smog failed to comply with the following sections of that Code:

11 a. **Section 44012:** Respondent Route 66 Smog failed to ensure that the emission control
12 tests were performed on vehicles 1 through 15, in accordance with procedures prescribed by the
13 department.

14 b. **Section 44015, subdivision (b):** Respondent Route 66 Smog issued electronic smog
15 certificates of compliance for vehicles 1 through 15, without ensuring that the vehicles were
16 properly tested and inspected to determine if they were in compliance with Health and Safety
17 Code section 44012.

18 c. **Section 44059:** Respondent Route 66 Smog willfully made false entries for the
19 electronic smog certificates of compliance by certifying that those vehicles had been inspected as
20 required when, in fact, they had not.

21 Complainant refers to, and by this reference incorporates, the allegations set forth above in
22 paragraphs 27 through 115, as though fully set forth.

23 **FIFTH CAUSE FOR DISCIPLINE**

24 **(Failure to Comply with Regulations Pursuant to the**
25 **Motor Vehicle Inspection Program)**

26 120. Respondent Route 66 Smog's Smog Check, Test Only Station License is subject to
27 discipline pursuant to Health and Safety Code section 44072.2, subdivision (c), in that between
28 March 16, 2024, through September 26, 2024, regarding vehicles 1 through 15, set forth above,

Respondent Route 66 Smog failed to comply with provisions of California Code of Regulations, title 16, as follows:

a. **Section 3340.24, subdivision (c)**: Respondent Route 66 Smog falsely or fraudulently issued electronic smog certificates of compliance for those vehicles without performing bona fide inspections of the emission control devices and systems on the vehicles as required by Health and Safety Code section 44012.

b. **Section 3340.35, subdivision (c)**: Respondent Route 66 Smog issued electronic smog certificates of compliance even though those vehicles had not been inspected in accordance with section 3340.42 of that Code.

c. **Section 3340.41, subdivision (c)**: Respondent Route 66 Smog knowingly entered false information into the emissions inspection system for the fifteen (15) vehicles identified above.

d. **Section 3340.42**: Respondent Route 66 Smog failed to conduct the required smog tests and inspections on those vehicles in accordance with the Bureau's specifications.

Complainant refers to, and by this reference incorporates, the allegations set forth above in paragraphs 27 through 115, as though fully set forth.

SIXTH CAUSE FOR DISCIPLINE

(Dishonesty, Fraud or Deceit)

121. Respondent Route 66 Smog's Smog Check, Test Only Station License is subject to discipline pursuant to Health and Safety Code sections 44072.2, subdivision (d) in conjunction with 44072.10, subdivision (c), in that between March 16, 2024, through September 26, 2024, regarding vehicles 1 through 15, set forth above, Respondent Route 66 Smog committed acts involving dishonesty, fraud or deceit whereby another was injured by issuing electronic smog certificates of compliance for those vehicles without performing bona fide inspections of the emission control devices and systems on the vehicles, thereby depriving the People of the State of California of the protection afforded by the Motor Vehicle Inspection Program. Complainant refers to, and by this reference incorporates, the allegations set forth above in paragraphs 27 through 115, as though fully set forth.

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1 **SEVENTH CAUSE FOR DISCIPLINE**

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

3 122. Respondent Gutierrez’s Smog Check Inspector License is subject to disciplinary
4 action under Health and Safety Code section 44072.2, subdivision (a), in that between August 8,
5 2024, through August 14, 2024, regarding vehicles 7 through 11, set forth above, Respondent
6 Gutierrez violated the following Health and Safety Code sections:

7 a. **Section 44012, subdivision (a):** Respondent Gutierrez 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 Gutierrez failed to perform emission
11 control tests on the vehicles identified above in accordance with procedures prescribed by the
12 Bureau.

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

16 d. **Section 44059:** Respondent Gutierrez willfully made false entries for the electronic
17 certificates of compliance by certifying that the vehicles identified above 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 27 through 30 and 82 through 100, as though fully set forth.

21 **EIGHTH CAUSE FOR DISCIPLINE**

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

24 123. Respondent Gutierrez’s Smog Check Inspector License is subject to discipline
25 pursuant to Health and Safety Code section 44072.2, subdivision (c), in that between August 8,
26 2024, through August 14, 2024, regarding vehicles 7 through 11, set forth above, he failed to
27 comply with provisions of California Code of Regulations, title 16, as follows:

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

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

7 c. **Section 3340.41, subdivision (c)**: Respondent Gutierrez knowingly entered false
8 information into the emissions inspection system for the five (5) vehicles identified above.

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

11 Complainant refers to, and by this reference incorporates, the allegations set forth above in
12 paragraphs 27 through 30 and 82 through 100, as though fully set forth.

13 **NINTH CAUSE FOR DISCIPLINE**

14 **(Dishonesty, Fraud, or Deceit – Respondent Gutierrez)**

15 124. Respondent Gutierrez's Smog Check Inspector License is subject to disciplinary
16 action under Health and Safety Code section 44072.2, subdivision (d), in conjunction with Health
17 and Safety Code section 44072.10, subdivision (c), in that between August 8, 2024, through
18 August 14, 2024, regarding vehicles 7 through 11, set forth above, Respondent Gutierrez
19 committed acts involving dishonesty, fraud, or deceit when he issued electronic smog certificates
20 of compliance for the vehicles without performing bona fide inspections of the emission control
21 devices and systems on those vehicles, thereby depriving the People of the State of California of
22 the protection afforded by the Motor Vehicle Inspection Program. Complainant refers to, and by
23 this reference incorporates, the allegations set forth above in paragraphs 27 through 30 and 82
24 through 100, as though fully set forth.

25 **TENTH CAUSE FOR DISCIPLINE**

26 **(Violations of the Motor Vehicle Inspection Program – Respondent Anguiano)**

27 125. Respondent Anguiano's Smog Check Inspector License is subject to disciplinary
28 action under Health and Safety Code section 44072.2, subdivision (a), in that on or about

September 26, 2024, regarding vehicles 12 through 15, set forth above, Respondent Anguiano violated the following Health and Safety Code sections:

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

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

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

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

Complainant refers to, and by this reference incorporates, the allegations set forth above in paragraphs 27 through 30, 82, and 101 through 115, as though fully set forth.

ELEVENTH CAUSE FOR DISCIPLINE

(Failure to Comply with Regulations Pursuant to the Motor Vehicle Inspection Program – Respondent Anguiano)

126. Respondent Anguiano's Smog Check Inspector License is subject to discipline pursuant to Health and Safety Code section 44072.2, subdivision (c), in that on or about September 26, 2024, regarding vehicles 12 through 15, set forth above, he failed to comply with provisions of California Code of Regulations, title 16, as follows:

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

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

c. **Section 3340.41, subdivision (c):** Respondent Anguiano knowingly entered false information into the emissions inspection system for the four (4) vehicles identified above.

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

Complainant refers to, and by this reference incorporates, the allegations set forth above in paragraphs 27 through 30, 82, and 101 through 115, as though fully set forth.

TWELFTH CAUSE FOR DISCIPLINE

(Dishonesty, Fraud, or Deceit – Respondent Anguiano)

127. Respondent Anguiano's Smog Check Inspector License is subject to disciplinary action under Health and Safety Code section 44072.2, subdivision (d), in conjunction with Health and Safety Code section 44072.10, subdivision (c), in that on or about September 26, 2024, regarding vehicles 12 through 15, set forth above, Respondent Anguiano committed acts involving dishonesty, fraud, or deceit when he issued electronic smog certificates of compliance for the vehicles without performing bona fide inspections of the emission control devices and systems on those vehicles, thereby depriving the People of the State of California of the protection afforded by the Motor Vehicle Inspection Program. Complainant refers to, and by this reference incorporates, the allegations set forth above in paragraphs 27 through 30, 82, and 101 through 115, as though fully set forth.

OTHER MATTERS

128. Pursuant to Code section 9884.7, subdivision (c), the director may suspend revoke, or place on probation the registrations for all places of business operated in this state by Amador Calderon Valiente, upon a finding that said Respondent Route 66 Smog has, or is, engaged in a course of repeated and willful violations of the laws and regulations pertaining to an automotive repair dealer.

129. Pursuant to Health and Safety Code section 44072.8, if Smog Check, Test Only

Station License No. TC 303254, issued to Amador Calderon Valiente-Owner dba The Route 66

1 Smog Check, 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.

4 130. Pursuant to Health and Safety Code section 44072.8, if Smog Check Inspector
5 License No. EO 644493, issued to Jose Angel Novoa Gutierrez, is revoked or suspended, any
6 additional license issued under Chapter 5 of Part 5 of Div 26 of the Health and Safety Code in the
7 name of said licensee may be likewise revoked or suspended by the director.

8 131. Pursuant to Health and Safety Code section 44072.8, if Smog Check Inspector
9 License No. EO 644341, issued to Victor Antonio Bonilla-Anguiano, is revoked or suspended,
10 any additional license issued under Chapter 5 of Part 5 of Div 26 of the Health and Safety Code in
11 the 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 303254, issued to Amador Calderon Valiente-Owner dba The Route 66 Smog Check;

18 2. Revoking, suspending, or placing on probation any other automotive repair dealer
19 registration issued in the name of Amador Calderon Valiente;

20 3. Revoking or suspending Smog Check, Test-Only, Station License Number TC
21 303254, issued to Amador Calderon Valiente-Owner dba The Route 66 Smog Check;

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 Amador Calderon Valiente;

24 5. Revoking or suspending Smog Check Inspector License Number EO 644493, issued
25 to Jose Angel Novoa Gutierrez;

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 Jose Angel Novoa Gutierrez;

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7. Revoking or suspending Smog Check Inspector License Number EO 644341, issued to Victor Antonio Bonilla-Anguiano;

8. Revoking or suspending any additional license issued under Chapter 5, Part 5 of Division 26 of the Health and Safety Code in the name of Victor Antonio Bonilla-Anguiano;

9. Ordering Amador Calderon Valiente, Jose Angel Novoa Gutierrez, and Victor Antonio Bonilla-Anguiano to pay the Bureau of Automotive Repair the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3, and if placed on probation, the costs of probation monitoring;

and,

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

DATED: As of digital signature date

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

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