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8  
9 **BEFORE THE**  
**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. **79/25-1454**

13 **UBALDO CURIEL ZEPEDA d.b.a.**  
**JURUPA V SMOG**  
14 **6645 Mission Blvd # C**  
**Riverside, CA 92509**

OAH No.

**ACCUSATION**

15 **-and-**

16 **19197 Painted Rock St**  
17 **Perris, CA 92570**

18 **Automotive Repair Dealer Registration No.**  
19 **ARD 301891; Smog Check Station License No.**  
**TC 301891**

20 **-and-**

21 **UBALDO CURIEL ZEPEDA**  
22 **19197 Painted Rock St**  
**Perris, CA 92570**

23 **Smog Check Inspector License No. EO 635028**

24 **-and-**

25 **ERNESTO CARRILLO**  
26 **3572 Banbury Dr Apt 27**  
**Riverside, CA 92505**

27 **Smog Check Inspector License No. EO 644580**  
28

**BRANDON FRANCISCO MOBASSER**  
**34732 Woods Pl**  
**Beaumont, CA 92223**

**Smog Check Inspector License No. EO 644392**

Respondents.

**PARTIES**

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

2. On or about March 4, 2022, Bureau of Automotive Repair issued Automotive Repair Dealer Registration Number ARD 301891 to Ubaldo C Zepeda dba Jurupa V Smog (Respondent Jurupa V Smog). The Automotive Repair Dealer Registration was in full force and effect at all times relevant to the charges brought herein and will expire on March 31, 2026, unless renewed.

3. On or about March 30, 2022, Bureau of Automotive Repair issued Smog Check, Test-Only, Station License Number TC 301891 to Ubaldo C Zepeda dba Jurupa V Smog. The Smog Check, Test-Only, Station License was in full force and effect at all times relevant to the charges brought herein and will expire on March 31, 2026, unless renewed.

4. Respondent is also certified as a STAR Station. The certification was issued on April 26, 2022, and will remain active unless the ARD registration and/or Smog Check Station license is revoked, canceled, licenses become delinquent, or the certification is suspended. The certification was suspended on March 8, 2024.

5. On or about December 10, 2012, Bureau of Automotive Repair issued Smog Check Inspector License Number EO 635028 to Ubaldo Curiel Zepeda (Respondent Zepeda). The Smog Check Inspector License was in full force and effect at all times relevant to the charges brought herein and will expire on May 31, 2027, unless renewed.

6. On or about September 25, 2023, Bureau of Automotive Repair issued Smog Check Inspector License Number EO 644580 to Ernesto Carrillo (Respondent Carrillo). 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.

7. On or about June 14, 2023, Bureau of Automotive Repair issued Smog Check Inspector License Number EO 644392 to Brandon Francisco Mobasser (Respondent Mobasser). The Smog Check Inspector License was in full force and effect at all times relevant to the charges brought herein and will expire on August 31, 2025, unless renewed.

## JURISDICTION

8. This Accusation is brought before the Director of the Department of Consumer Affairs (“Director”) for the Bureau, under the authority of the following laws.

9. Section 9884.7 of the Business and Professions Code<sup>1</sup> provides that the Director may revoke an ARD registration.

10. 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.

11. 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.

12. 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 disciplinary action.

## STATUTORY PROVISIONS

13. Section 9884.7 of the Code states:

(a) The director, where 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.

<sup>1</sup> All statutory references herein shall be to the Business and Professions Code unless specifically stated otherwise.

1 (1) Making or authorizing in any manner or by any means whatever any  
2 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.

3 ...

4 (4) Any other conduct which constitutes fraud.

5 ...

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

8 14. Section 44072.2 of the Health and Safety Code states:

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

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

13 ...

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

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

18 ...

19 15. Section 44072.10 of the Health and Safety Code states, in pertinent part:

20 ...

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

24 (1) Clean piping, as defined by the department.

25 ...

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

27 ...”

28 ///

1 **REGULATORY PROVISIONS**

2 16. California Code of Regulations, title 16, section 3340.24, subdivision (c), states:

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

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

6 A smog check technician shall comply with the following requirements at all  
times while licensed.

7 (a) A licensed technician shall inspect, test and repair vehicles in accordance  
8 with section 44012 of the Health and Safety Code, section 44035 of the  
Health and Safety Code, and section 3340.42 of this article. . . .”

9 18. California Code of Regulations, title 16, section 3340.35, states, in pertinent part:

10 . . . .

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

14 19. California Code of Regulations, title 16, section 3340.42, sets forth specific emissions  
15 test methods and procedures which apply to all vehicles inspected in the State of California.

16 **COST RECOVERY**

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

23 **VID DATA REVIEW**

24 21. Beginning March 9, 2015, California’s Smog Check Program was updated to require  
25 the use of an On-Board Diagnostic Inspection System (“OIS”). OIS is the Smog Check  
26 equipment required in all areas of the State when inspecting most model-year 2000 and newer  
27 gasoline and hybrid vehicles and most 1998 and newer diesel vehicles. The system consists of a  
28 certified Data Acquisition Device (“DAD”), computer, bar code scanner, and printer. The DAD

1 is an On-Board Diagnostic (“OBD”) scan tool that, when requested by the California OIS  
2 software, retrieves OBD data from the vehicle. All OBD data that the vehicle indicates it  
3 supports is requested by the California OIS software and will be retrieved. The DAD connects  
4 between the OIS computer and the vehicle’s DLC. The California OIS software requires a  
5 continuous Internet connection when performing a Smog Check inspection and the OIS software  
6 communicates with BAR’s central database through the Internet connection. The bar code  
7 scanner is used to input technician information, the vehicles identification number (“VIN”), and  
8 DMV renewal information. The printer provides a Vehicle Inspection Report (“VIR”) containing  
9 inspection results for motorists and a Smog Check Certificate of Compliance number for passing  
10 vehicles.

11 22. Data retrieved and recorded during an OIS smog check includes; the eVIN, which is  
12 the digitally stored VIN programmed into the vehicle’s Powertrain Control Module (“PCM”); the  
13 communication protocol, which is the manufacturer/vehicle specific language the PCM uses to  
14 relay information; and the number of Parameter Identifications (“PIDs”), which is the number of  
15 specific data values each PCM uses related to emissions controls.

16 23. During an OIS inspection, engine operating parameters are retrieved from the  
17 vehicle’s OBD II system and recorded to the VID. This is accomplished during the functional  
18 portion of the OIS Smog Check inspection by plugging the DAD into the vehicle’s DLC when  
19 prompted by the OIS analyzer screen prompt. Some of the parameters recorded are:

- 20 • Engine speed in revolutions per minute (RPM)
- 21 • Throttle position as measured by a throttle position sensor (TPS) mounted onto  
22 the throttle shaft. Measured in a percentage of opening from 0% at idle and near  
23 or up to 100% at full throttle.
- 24 • Manifold absolute pressure as measured by a manifold air pressure sensor (MAP)  
25 connected to an intake manifold source, measured in kilo pascals (kpa). Typical  
26 readings for a normally aspirated vehicle as follows: 0 kpa being absolute vacuum,  
27 25kpa to 45kpa at idle, 101 kpa at full throttle, same as atmospheric pressure at  
28 sea level.

- Mass air flow as measured by a mass air flow sensor (MAF) mounted in the engine's air intake tract. Measured in grams per second (gps).<sup>2</sup>
- Ignition timing is set by the vehicle PCM based on engine speed and load, and is measured in degrees Before Top Dead Center (BTDC).

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

25. During an OIS Smog Check inspection, along with other visual and functional inspections, there is an OBD II query portion of the inspection. The OBD II query is performed with the engine idling and, when requested by the OIS analyzer, and an elevated or increased engine speed.

26. If the vehicle passes the visual, functional and tailpipe tests, it passes the overall inspection, and a Certificate of Compliance is issued and transmitted electronically to the Vehicle Information Database ("VID"). These Certificates of Compliance are purchased in blocks of fifty (50) through the EIS or OIS from the VID, using a pre-arranged electronic bank account debit system or by check, via mail, from Bureau Headquarters in Sacramento. Each Certificate of Compliance has a unique control number so that it can be tracked to determine which Smog Check Station purchased the Certificate of Compliance and to which vehicle it was issued.

27. The VID contains registration data from Department of Motor Vehicles ("DMV") plus emission standards, vehicle smog check inspections, smog check stations and technicians,

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<sup>2</sup> Not all vehicles include both MAP and MAF parameters. Many vehicles will have either MAP or MAF parameters separately.

1 and Certificates of Compliance. The VID receives the passing smog check results immediately  
2 following the inspection. During the vehicle registration process, the DMV accesses the VID to  
3 verify that the vehicle has been tested and certified. The Bureau can also access the VID to view  
4 test data on smog check inspections performed at any Smog Check Station, or search for, retrieve,  
5 and print a test record for a particular vehicle which has been tested. The EIS or OIS, depending  
6 on the test type, also prints a Vehicle Inspection Report (“VIR”), which is a physical record of the  
7 test results and shows the Certificate of Compliance number that was issued if the vehicle passed  
8 the smog inspection.

9 28. The smog check technician must sign the VIR under penalty of perjury to indicate  
10 that the inspection was done within Bureau guidelines. Smog Check Stations are required by law  
11 to maintain a copy of the VIR along with a copy of the repair invoice for three years. The  
12 consumer’s VIR serves as a receipt and proof that the VID was updated, and a Certificate of  
13 Compliance was issued. Licensed Smog Check Technicians are the only persons authorized by  
14 the Bureau to perform official inspections. They are issued a personal access code and a license,  
15 which are used to gain access to the EIS and OIS to perform smog check inspections.  
16 Unauthorized use of another technician’s access code or license is prohibited.

17 29. Respondents have engaged in numerous acts or omissions constituting violations of  
18 the Automotive Repair Act (Business and Professions Code section 9880 *et seq.*) and Motor  
19 Vehicle Inspection Program (Health and Safety Code section 44000 *et seq.*) through their practice  
20 of “clean plugging.”<sup>3</sup> Respondent’s employees’ OIS Test Data available on the State database  
21 indicates that Respondents are involved in fraudulent smog inspection activities. A Bureau  
22 representative initiated an investigation based on information transmitted to the VID for smog  
23 check inspections performed by Respondent’s employees. The investigation revealed that the  
24 data related to certain vehicles certified by Respondent’s employees contained a pattern of  
25 unmistakable discrepancies between the information transmitted during the inspections and

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26 <sup>3</sup> “Clean plugging” refers to the use of another vehicle’s properly functioning On Board  
27 Diagnostic, generation II, (OBD II) system, or another source, to generate passing diagnostic  
28 readings for the purpose of issuing fraudulent smog Certificates of Compliance to vehicles that  
are not in smog compliance and/or not present for testing.



documented information known about the vehicles at issue. Specifically, the representative compared the data received from the certified vehicles to data from vehicles of the same year, make, and model and determined that the data from at least fifteen (15) of the certified vehicles were fraudulently tested by Respondent's employees during the smog inspection using the "clean plugging" method as follows:

**Fraudulent Inspection #1 (Carrillo):**

30. Bureau representative Steve Koch (Koch) reviewed the VID data for Jurupa V Smog. The review indicates on December 8, 2023, a 2002 BMW M3, CA license 5TEL416, VIN WBSBL93412JR13696 (2002 M3), was tested and Smog Check certificate # IX781080C was issued under licensed Smog Check technician #EO644580, Carrillo.

31. The dynamic data and PID charts for the 2002 M3 shows between time stamps 169 and 17789, engine speed is steady at approximately 825 RPM. During this time, the TPS is fixed at a 0% opening, MAF is fixed at 7.15 gps, and the spark timing for #1 cylinder is fixed at 21.5 degrees BTDC. After time stamp 17789, the engine speed accelerates to approximately 1525 RPM. From the time the engine RPM increases off idle to the higher RPMs, the TPS is fixed at the same 0% opening, MAF is fixed at the same 7.15 gps, and the spark timing for #1 cylinder is also still fixed at the same 21.5 degrees BTDC.

32. During the entire period the dynamic data was collected, the only parameter that changed was engine RPM. The TPS, MAF, and spark timing readings remained unchanged even though the engine speed was increased. These readings are not characteristic or expected for normal engine operation. The discrepancies in the dynamic data prove the DAD was not connected to the 2002 M3 being certified, causing the issuance of a fraudulent Smog Check certificate of compliance.

**Fraudulent Inspection #2 (Carrillo):**

33. Koch reviewed the VID data for Jurupa V Smog. The review indicates on December 23, 2023, a 2000 Mazda MPV Wagon, CA license 6HZZ446, VIN JM3LW28G0Y0141775 (2000 MPV), was tested and Smog Check certificate # TQ301034C was issued under licensed Smog Check Technician #EO644580, Carrillo.

1           34. The dynamic data and PID charts for the 2000 MPV shows, between time stamps 332  
2 and 18399, engine speed is steady at approximately 725 RPM. During this time, the TPS is fixed  
3 at a 0% opening, MAF is fixed at 3.6 gps, and the spark timing for #1 cylinder is fixed at 10.5  
4 degrees BTDC. After time stamp 18399, the engine speed accelerates to approximately 1700  
5 RPM. From the time the engine RPM increases off idle to the higher RPMs, the TPS is fixed at  
6 the same 0% opening, MAF is fixed at the same 3.6 gps, and the spark timing for #1 cylinder is  
7 also still fixed at the same 10.5 degrees BTDC.

8           35. During the entire period the dynamic data was collected, the only parameter that  
9 changed was engine RPM. The TPS, MAF, and spark timing readings remained unchanged even  
10 though the engine speed was increased. These readings are not characteristic or expected for  
11 normal engine operation. The discrepancies in the dynamic data prove the DAD was not  
12 connected to the 2000 MPV being certified, causing the issuance of a fraudulent Smog Check  
13 certificate of compliance.

14           **Fraudulent Inspection #3 (Carrillo):**

15           36. Koch reviewed the VID data for Jurupa V Smog. The review indicates on December  
16 29, 2023, a 2005 Hummer H2, CA license 6AMU752, VIN 5GRGN23U05H101413 (2005 H2),  
17 was tested and Smog Check certificate # TQ413437C was issued under licensed Smog Check  
18 Technician #EO644580, Carrillo.

19           37. The dynamic data and PID charts for the 2005 H2 shows, between time stamps 30  
20 and 19299, engine speed is steady at approximately 600 RPM. During this time, the TPS is fixed  
21 at a 4.7% opening, MAF is fixed at 5.93 gps, MAP is fixed at 35 kPa, and the spark timing for #1  
22 cylinder is fixed at 15 degrees BTDC. After time stamp 19299, the engine speed accelerates to  
23 approximately 1950 RPM. From the time the engine RPM increases off idle to the higher RPMs,  
24 the TPS is fixed at the same 4.7% opening, MAF is fixed at the same 5.93 gps, MAP is fixed at  
25 the same 35 kPa, and the spark timing for #1 cylinder is also still fixed at the same 15 degrees  
26 BTDC.

27           38. During the entire period the dynamic data was collected, the only parameter that  
28 changed was engine RPM. The TPS, MAF, MAP and spark timing readings remained unchanged

1 even though the engine speed was increased. These readings are not characteristic or expected for  
2 normal engine operation. The discrepancies in the dynamic data prove the DAD was not  
3 connected to the 2005 H2 being certified, causing the issuance of a fraudulent Smog Check  
4 certificate of compliance.

5 **Fraudulent Inspection #4 (Carrillo):**

6 39. Koch reviewed the VID data for Jurupa V Smog. The review indicates on December  
7 29, 2023, a 2004 Nissan Altima Base, CA license 7NPA288, VIN 1N4AL11D14C181283 (2004  
8 Altima), was tested and Smog Check certificate # TQ413438C was issued under licensed Smog  
9 Check technician #EO644580, Carrillo.

10 40. The dynamic data and PID charts for the 2004 Altima shows, between time stamps  
11 187 and 19408, engine speed is steady at approximately 725 RPM. During this time, the TPS is  
12 fixed at a 2% opening, MAF is fixed at 3.27 gps, and the spark timing for #1 cylinder is fixed at  
13 12 degrees BTDC. After time stamp 19408, the engine speed accelerates to approximately 1925  
14 RPM. From the time the engine RPM increases off idle to the higher RPMs, the TPS is fixed at  
15 the same 2% opening, MAF is fixed at the same 3.27 gps, and the spark timing for #1 cylinder is  
16 also still fixed at the same 12 degrees BTDC.

17 41. During the entire period the dynamic data was collected, the only parameter that  
18 changed was engine RPM. The TPS, MAF, and spark timing readings remained unchanged even  
19 though the engine speed was increased. These readings are not characteristic or expected for  
20 normal engine operation. The discrepancies in the dynamic data prove the DAD was not  
21 connected to the 2004 Altima being certified, causing the issuance of a fraudulent Smog Check  
22 certificate of compliance.

23 **Fraudulent Inspection #5 (Carrillo):**

24 42. Koch reviewed the VID data for Jurupa V Smog. The review indicates on January 3,  
25 2024, a 2004 Subaru Impreza WRX, CA license 5CWA756, VIN JF1GD29694G506483 (2004  
26 WRX), was tested and Smog Check certificate # TQ537584C was issued under licensed Smog  
27 Check technician #EO644580, Carrillo.

43. The dynamic data PID charts for the 2004 WRX shows, between time stamps 186 and 20166, engine speed is steady at approximately 700 RPM. During this time, the TPS is fixed at 10.6% opening, MAF is fixed at 2.49 gps, MAP is fixed at 29 kPa, and the spark timing for #1 cylinder is fixed at 11 degrees BTDC. After time stamp 20166, the engine speed accelerates to approximately 1600 RPM. From the time the engine RPM increases off idle to the higher RPMs, the TPS is fixed at the same 10.6% opening, MAF is fixed at the same 2.49 gps, MAP is fixed at the same 29 kPa, and the spark timing for #1 cylinder is also still fixed at the same 11 degrees BTDC.

44. During the entire period the dynamic data was collected, the only parameter that changed was engine RPM. The TPS, MAF, MAP, and spark timing readings remained unchanged even though the engine speed was increased. These readings are not characteristic or expected for normal engine operation. The discrepancies in the dynamic data prove the OIS DAD was not connected to the 2004 WRX being certified, causing the issuance of a fraudulent Smog Check certificate of compliance.

**Fraudulent Inspection #6 (Zepeda):**

45. Koch reviewed the VID data for Jurupa V Smog. The review indicates on January 9, 2024, a 2002 Ford Explorer XLS, CA license 5LNR010, VIN 1FMZU62E12ZA31680 (2002 Explorer), was tested and Smog Check certificate # IX983557C was issued under licensed Smog Check Technician #EO635028, Zepeda.

46. The dynamic data and PID charts for the 2002 Explorer shows, between time stamps 21 and 25069, engine speed is steady at approximately 650 RPM. During this time, the TPS is fixed at 17.6% opening, MAF is fixed at .16 gps, and the spark timing for #1 cylinder is fixed at 0 degrees BTDC. After time stamp 25069, the engine speed accelerates to approximately 1800 RPM. From the time the engine RPM increases off idle to the higher RPMs, the TPS is fixed at the same 17.6% opening, MAF is fixed at the same .16 gps, and the spark timing for #1 cylinder is also still fixed at the same 0 degrees BTDC.

47. During the entire period the dynamic data was collected, the only parameter that changed was engine RPM. The TPS, MAF, and spark timing readings remained unchanged even

1 though the engine speed was increased. These readings are not characteristic or expected for  
2 normal engine operation. The discrepancies in the dynamic data prove the DAD was not  
3 connected to the 2002 Explorer being certified, causing the issuance of a fraudulent Smog Check  
4 certificate of compliance.

5 **Fraudulent Inspection #7 (Zepeda):**

6 48. Koch reviewed the VID data for Jurupa V Smog. The review indicates on January 24,  
7 2024, a 2002 Chevrolet Tahoe C1500, CA license 76651V2, VIN 1GNEC13Z72R271642 (2002  
8 Tahoe), was tested and Smog Check certificate # TS180711C was issued under licensed Smog  
9 Check technician #EO635028, Zepeda.

10 49. The dynamic data and PID charts for the 2002 Tahoe shows, between time stamps 43  
11 and 18233, engine speed is steady at approximately 550 RPM. During this time, the TPS is fixed  
12 at 10.2% opening, MAF is fixed at 6.36 gps, MAP is fixed at 41 kPa, and the spark timing for #1  
13 cylinder is fixed at 17.5 degrees BTDC. After time stamp 18233, the engine speed accelerates to  
14 approximately 1950 RPM. From the time the engine RPM increases off idle to the higher RPMs,  
15 the TPS is fixed at the same 10.2% opening, MAF is fixed at the same 6.36 gps, MAP is fixed at  
16 the same 41 kPa, and the spark timing for #1 cylinder is also still fixed at the same 17.5 degrees  
17 BTDC.

18 50. During the entire period the dynamic data was collected, the only parameter that  
19 changed was engine RPM. The TPS, MAF, MAP, and spark timing readings remained unchanged  
20 even though the engine speed was increased. These readings are not characteristic or expected for  
21 normal engine operation. The discrepancies in the dynamic data prove the DAD was not  
22 connected to the 2002 Tahoe being certified, causing the issuance of a fraudulent Smog Check  
23 certificate of compliance.

24 **Fraudulent Inspection #8 (Zepeda):**

25 51. Koch reviewed the VID data for Jurupa V Smog. The review indicates on February 3,  
26 2024, a 2001 GMC New Sierra C1500, CA license 35530Z1, VIN 2GTEC19V611330877 (2001  
27 New Sierra), was tested and Smog Check certificate # TS368742C was issued under licensed  
28 Smog Check Technician #EO635028, Zepeda.

52. The dynamic data and PID charts for the 2001 New Sierra shows, between time stamps 24 and 25024, engine speed is steady at approximately 550 RPM. During this time, the TPS is fixed at 0% opening, MAF is fixed at 4.36 gps, MAP is fixed at 35 kPa, and the spark timing for #1 cylinder is fixed at 22.5 degrees BTDC. After time stamp 25024, the engine speed accelerates to approximately 2150 RPM. From the time the engine RPM increases off idle to the higher RPMs, the TPS is fixed at the same 0% opening, MAF is fixed at the same 4.36 gps, MAP is fixed at the same 35 kPa, and the spark timing for #1 cylinder is also still fixed at the same 22.5 degrees BTDC.

53. During the entire period the dynamic data was collected, the only parameter that changed was engine RPM. The TPS, MAF, MAP, and spark timing readings remained unchanged even though the engine speed was increased. These readings are not characteristic or expected for normal engine operation. The discrepancies in the dynamic data prove the DAD was not connected to the 2001 New Sierra being certified, causing the issuance of a fraudulent Smog Check certificate of compliance.

#### **Previous Failing Tests: 2001 New Sierra**

54. Two previous failing tests were performed on the 2001 New Sierra.

The most recent failing test was performed on the 2001 New Sierra at another station on May 25, 2023. The 2001 New Sierra failed the test for incomplete OBD readiness monitors. No dynamic PID data was collected during the test.

55. The earlier failing test was performed on the 2001 New Sierra at another station on March 14, 2023. The 2001 New Sierra failed the test for Visual: Tampered Other Emission Related Components/Systems, and incomplete OBD readiness monitors. No dynamic PID data was collected during the test.

#### **Fraudulent Inspection #9 (Mobasser):**

56. Koch reviewed the VID data for Jurupa V Smog. The review indicates on April 5, 2024, a 2000 Toyota Camry CE, CA license 4KRA124, VIN 4T1BG22K1YU663446 (2000 Camry), was tested and Smog Check certificate # TU772249C was issued under licensed Smog Check Technician #EO644392, Mobasser.

1           57. The dynamic data and PID charts for the 2000 Camry shows, between time stamps  
2 150 and 20055, engine speed is steady at approximately 700 RPM. During this time, the TPS is  
3 fixed at 12.9% opening, MAP is fixed at 25 kPa, and the spark timing for #1 cylinder is fixed at  
4 6.5 degrees BTDC. After time stamp 20055, the engine speed accelerates to approximately 1700  
5 RPM. From the time the engine RPM increases off idle to the higher RPMs, the TPS is fixed at  
6 the same 12.9% opening, MAP is fixed at the same 25 kPa, and the spark timing for #1 cylinder is  
7 also still fixed at the same 6.5 degrees BTDC.

8           58. During the entire period the dynamic data was collected, the only parameter that  
9 changed was engine RPM. The TPS, MAP, and spark timing readings remained unchanged even  
10 though the engine speed was increased. These readings are not characteristic or expected for  
11 normal engine operation. The discrepancies in the dynamic data prove the DAD was not  
12 connected to the 2000 Camry being certified, causing the issuance of a fraudulent Smog Check  
13 certificate of compliance.

14           **Fraudulent Inspection #10 (Mobasser):**

15           59. Koch reviewed the VID data for Jurupa V Smog. The review indicates on April 8,  
16 2024, a 2003 Ford Econoline E150 Van, CA license 7D28611, VIN 1FTRE14W33HA04577  
17 (2003 Econoline), was tested and Smog Check certificate # TU972012C was issued under  
18 licensed Smog Check technician #EO644392, Mobasser.

19           60. The dynamic data and PID charts for the 2003 Econoline shows, between time stamps  
20 23 and 18760, engine speed is steady at approximately 700 RPM. During this time, the TPS is  
21 fixed at 17.6% opening, MAF is fixed at 4.09 gps, and the spark timing for #1 cylinder is fixed at  
22 11 degrees BTDC. After time stamp 18760, the engine speed accelerates to approximately 1700  
23 RPM. From the time the engine RPM increases off idle to the higher RPMs, the TPS is fixed at  
24 the same 17.6% opening, MAF is fixed at the same 4.09 gps, and the spark timing for #1 cylinder  
25 is also still fixed at the same 11 degrees BTDC.

26           61. During the entire period the dynamic data was collected, the only parameter that  
27 changed was engine RPM. The TPS, MAF, and spark timing readings remained unchanged even  
28 though the engine speed was increased. These readings are not characteristic or expected for

1 normal engine operation. The discrepancies in the dynamic data prove the DAD was not  
2 connected to the 2003 Econoline being certified, causing the issuance of a fraudulent Smog  
3 Check certificate of compliance.

4 **Fraudulent Inspection #11 (Mobasser):**

5 62. Koch reviewed the VID data for Jurupa V Smog. The review indicates on April 10,  
6 2024, a 2002 Chevrolet Silverado C2500 Heavy Duty, CA license 14831M3, VIN  
7 1GCHC23UX2F112681 (2002 Silverado HD), was tested and Smog Check certificate  
8 TU972023C was issued under licensed Smog Check Technician #EO644392, Mobasser.

9 63. The dynamic data and PID charts for the 2002 Silverado HD shows, between time  
10 stamps 30 and 29989, engine speed is steady at approximately 600 RPM. During this time, the  
11 TPS is fixed at 0% opening, MAF is fixed at 4.96 gps, MAP is fixed at 30 kPa, and the spark  
12 timing for #1 cylinder is fixed at 15 degrees BTDC. After time stamp 29989, the engine speed  
13 accelerates to approximately 2050 RPM. From the time the engine RPM increases off idle to the  
14 higher RPMs, the TPS is fixed at the same 0% opening, MAF is fixed at the same 4.96 gps, MAP  
15 is fixed at the same 30 kPa, and the spark timing for #1 cylinder is also still fixed at the same 15  
16 degrees BTDC.

17 64. During the entire period the dynamic data was collected, the only parameter that  
18 changed was engine RPM. The TPS, MAF, MAP, and spark timing readings remained unchanged  
19 even though the engine speed was increased. These readings are not characteristic or expected for  
20 normal engine operation. The discrepancies in the dynamic data prove the DAD was not  
21 connected to the 2002 Silverado HD being certified, causing the issuance of a fraudulent Smog  
22 Check certificate of compliance.

23 **Previous Failing Test: 2002 Silverado HD**

24 65. A previous failing test was performed on the 2002 Silverado HD by licensed  
25 inspector Zepeda at Jurupa V Smog on March 18, 2024. The 2002 Silverado HD failed the test for  
26 incomplete OBD readiness monitors. The vehicle also had a pending OBD DTC P0308. The  
27 dynamic PID data collected during the test shows the expected change in the TPS, MAF, MAP,  
28 and spark timing parameters as characteristic or expected for normal engine operation.



**Fraudulent Inspection #12 (Mobasser):**

66. Koch reviewed the VID data for Jurupa V Smog. The review indicates on April 20, 2024, a 2003 Toyota Echo, CA license 5GAH954, VIN JTDBT123435037069 (2003 Echo), was tested and Smog Check certificate # TW234937C was issued under licensed Smog Check Technician #EO644392, Mobasser.

67. The dynamic data and PID charts for the 2003 Echo shows, between time stamps 134 and 18273, engine speed is steady at approximately 700 RPM. During this time, the TPS is fixed at 11% opening, MAF is fixed at 1.75 gps, and the spark timing for #1 cylinder is fixed at 5.5 degrees BTDC. After time stamp 18273, the engine speed accelerates to approximately 1925 RPM. From the time the engine RPM increases off idle to the higher RPMs, the TPS is fixed at the same 11% opening, MAF is fixed at the same 1.75 gps, and the spark timing for #1 cylinder is also still fixed at the same 5.5 degrees BTDC.

68. During the entire period the dynamic data was collected, the only parameter that changed was engine RPM. The TPS, MAF, and spark timing readings remained unchanged even though the engine speed was increased. These readings are not characteristic or expected for normal engine operation. The discrepancies in the OIS Test Data prove the DAD was not connected to the 2003 Echo being certified, causing the issuance of a fraudulent Smog Check certificate of compliance.

**Fraudulent Inspection #13 (Mobasser):**

69. Koch reviewed the VID data for Jurupa V Smog. The review indicates on April 20, 2024, a 2005 Mercedes-Benz ML 500, CA license 5KRJ572, VIN 4JGAB75EX5A553411 (2005 ML 500), was tested and Smog Check certificate # TW234939C was issued under licensed Smog Check technician #EO644392, Mobasser.

70. The dynamic data and PID charts for the 2005 ML 500 shows, between time stamps 174 and 17927, engine speed is steady at approximately 650 RPM. During this time, the TPS is fixed at 3.9% opening, MAF is fixed at 5.41 gps, MAP is fixed at 33 kPa, and the spark timing for #1 cylinder is fixed at -7.5 degrees BTDC. After time stamp 17927, the engine speed accelerates to approximately 1650 RPM. From the time the engine RPM increases off idle to the

1 higher RPMs, the TPS is fixed at the same 3.9% opening, MAF is fixed at the same 5.41 gps,  
2 MAP is fixed at the same 33 kPa, and the spark timing for #1 cylinder is also still fixed at the  
3 same -7.5 degrees BTDC.

4 71. During the entire period the dynamic data was collected, the only parameter that  
5 changed was engine RPM. The TPS, MAF, MAP, and spark timing readings remained unchanged  
6 even though the engine speed was increased. These readings are not characteristic or expected for  
7 normal engine operation. The discrepancies in the dynamic data prove the DAD was not  
8 connected to the 2005 ML 500 being certified, causing the issuance of a fraudulent Smog Check  
9 certificate of compliance.

10 **Fraudulent Inspection #14 (Zepeda):**

11 72. Koch reviewed the VID data for Jurupa V Smog. The review indicates on October 11,  
12 2024, a 2004 Infiniti I35, CA license 8KIT566, VIN JNKDA31A64T208278 (2004 I35), was  
13 tested and Smog Check certificate # JB480692C was issued under licensed Smog Check  
14 Technician #EO635028, Zepeda.

15 73. The dynamic data PID charts for the 2004 I35 shows, between time stamps 389 and  
16 17762, engine speed is steady at approximately 800 RPM. During this time, the TPS is fixed at  
17 0% opening, MAF is fixed at .2 gps, and the spark timing for #1 cylinder is fixed at 63.5 degrees  
18 BTDC. After time stamp 17762, the engine speed accelerates to approximately 1750 RPM. From  
19 the time the engine RPM increases off idle to the higher RPMs, the TPS is fixed at the same 0%  
20 opening, MAF is fixed at the same .2 gps, and the spark timing for #1 cylinder is also still fixed at  
21 the same 63.5 degrees BTDC.

22 74. During the entire period the dynamic data was collected, the only parameter that  
23 changed was engine RPM. The TPS, MAF, and spark timing readings remained unchanged even  
24 though the engine speed was increased. These readings are not characteristic or expected for  
25 normal engine operation. The discrepancies in the dynamic data prove the DAD was not  
26 connected to the 2004 I35 being certified, causing the issuance of a fraudulent Smog Check  
27 certificate of compliance.

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**Fraudulent Inspection #15 (Zepeda):**

75. Koch reviewed the VID data for Jurupa V Smog. The review indicates on January 29, 2025, a 2005 Chrysler Sebring Touring, CA license P541250, VIN 1C3EL55R95N646069 (2005 Sebring), was tested and Smog Check certificate # UK016638C was issued under licensed Smog Check Technician #EO635028, Zepeda.

76. The dynamic data and PID charts for the 2005 Sebring shows, between time stamps 115 and 18860, engine speed is steady at approximately 700 RPM. During this time, the TPS is fixed at 14.9% opening, MAP is fixed at 33 kPa, and the spark timing for #1 cylinder is fixed at 7 degrees BTDC. After time stamp 18860, the engine speed accelerates to approximately 1600 RPM. From the time the engine RPM increases off idle to the higher RPMs, the TPS is fixed at the same 14.9% opening, MAP is fixed at the same 33 kPa, and the spark timing for #1 cylinder is also still fixed at the same 7 degrees BTDC.

77. During the entire period the dynamic data was collected, the only parameter that changed was engine RPM. The TPS, MAP, and spark timing readings remained unchanged even though the engine speed was increased. These readings are not characteristic or expected for normal engine operation. The discrepancies in the dynamic data prove the DAD was not connected to the 2005 Sebring being certified, causing the issuance of a fraudulent Smog Check certificate of compliance.

**FIRST CAUSE FOR DISCIPLINE**

**(Untrue or Misleading Statements - Respondent Jurupa V Smog)**

78. Respondent Jurupa V Smog's registration is subject to disciplinary action pursuant to section 9884.7, subdivision (a)(1), in that Respondent's employees made or authorized statements which they knew or in the exercise of reasonable care should have known to be untrue or misleading, as follows: Respondent's employees certified that the vehicles set forth above in paragraphs 30-77, had passed inspection and were in compliance with applicable laws and regulations. In fact, Respondent's employees conducted the inspections on those vehicles using the clean plugging method in order to issue smog certificates of compliance, and did not test or inspect the vehicles as required by Health and Safety Code section 44012.

1 **SECOND CAUSE FOR DISCIPLINE**

2 **(Fraud - Respondent Jurupa V Smog)**

3 79. Respondent Jurupa V Smog's registration is subject to disciplinary action pursuant to  
4 section 9884.7, subdivision (a)(4), in that Respondent Jurupa V Smog's employees committed  
5 acts which constitute fraud by issuing electronic certificates of compliance for the vehicles set  
6 forth above in paragraphs 30-77, without performing bona fide inspections of the emission  
7 control devices and systems on those vehicles, thereby depriving the People of the State of  
8 California of the protection afforded by the Motor Vehicle Inspection Program.

9 **THIRD CAUSE FOR DISCIPLINE**

10 **(Failure to Comply with the Motor Vehicle Inspection Program –**

11 **Respondent Jurupa V Smog)**

12 80. Respondent Jurupa V Smog's smog station license is subject to disciplinary action  
13 pursuant to Health and Safety Code section 44072.2, subdivision (a), in conjunction with Health  
14 and Safety Code section 44072.10 subdivision (c), in that regarding the vehicles set forth above in  
15 paragraphs 30-77, Respondent Jurupa V Smog failed to comply with the following sections of the  
16 Health and Safety Code:

17 (a) **Section 44012**: Respondent Jurupa V Smog's employees failed to ensure that the  
18 emission control tests were performed on the vehicles, in accordance with procedures prescribed  
19 by the department.

20 (b) **Section 44015**: Respondent Jurupa V Smog's employees issued electronic  
21 certificates of compliance for the vehicles, without ensuring that the vehicles were properly tested  
22 and inspected to determine if they were in compliance with Health and Safety Code section  
23 44012.

24 **FOURTH CAUSE FOR DISCIPLINE**

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

26 **Respondent Jurupa V Smog)**

27 81. Respondent Jurupa V Smog's smog station license is subject to disciplinary action  
28 pursuant to Health and Safety Code section 44072.2, subdivision (c), in that regarding the

1 vehicles set forth above in paragraphs 30-77, Respondent's employees failed to comply with the  
2 following provisions of the California Code of Regulations, Title 16, as follows:

3 (a) **Section 3340.35, subdivision (c)**: Respondent Jurupa V Smog's employees issued  
4 electronic certificates of compliance even though those vehicles had not been inspected in  
5 accordance with section 3340.42, Title 16, of the California Code of Regulations.

6 (b) **Section 3340.42**: Respondent Jurupa V Smog's employees failed to conduct the  
7 required smog tests and inspections on those vehicles in accordance with the Bureau's  
8 specifications.

9 **FIFTH CAUSE FOR DISCIPLINE**

10 **(Dishonesty, Fraud or Deceit - Respondent Jurupa V Smog)**

11 82. Respondent Jurupa V Smog's smog station license is subject to disciplinary action  
12 pursuant to Health and Safety Code section 44072.2, subdivision (d), in conjunction with Health  
13 and Safety Code section 44072.10 subdivision (c), in that regarding the vehicles set forth above in  
14 paragraphs 30-77, Respondent Jurupa V Smog's employee's committed acts involving  
15 dishonesty, fraud or deceit whereby another was injured by issuing electronic certificates of  
16 compliance for those vehicles without performing bona fide inspections of the emission control  
17 devices and systems on the vehicles, thereby depriving the People of the State of California of the  
18 protection afforded by the Motor Vehicle Inspection Program.

19 **SIXTH CAUSE FOR DISCIPLINE**

20 **(Violations of the Motor Vehicle Inspection Program – Respondent Zepeda)**

21 83. Respondent Zepeda's smog check inspector license is subject to discipline pursuant to  
22 Health and Safety Code section 44072.2, subdivision (a), in that regarding the vehicles set forth  
23 above in paragraphs 45-53 and 72-77, Respondent Zepeda failed to comply with section 44012 of  
24 the Health and Safety Code in a material respect, as follows: Respondent Zepeda failed to  
25 perform the emission control tests on those vehicles in accordance with procedures prescribed by  
26 the department.

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1 **SEVENTH CAUSE FOR DISCIPLINE**

2 **(Failure to Comply with Regulations Pursuant to the Motor Vehicle Inspection Program –**  
3 **Respondent Zepeda)**

4 84. Respondent Zepeda's smog check inspector license is subject to discipline pursuant to  
5 Health and Safety Code section 44072.2, subdivision (c), in that regarding the vehicles set forth  
6 above in paragraphs 45-53 and 72-77, Respondent Zepeda failed to comply with provisions of the  
7 California Code of Regulations, title 16, as follows:

8 (a) **Section 3340.30, subdivision (a)**: Respondent Zepeda failed to inspect and test those  
9 vehicles in accordance with Health and Safety Code section 44012.

10 (b) **Section 3340.41, subdivision (c)**: Respondent Zepeda entered false information into  
11 the EIS.

12 (c) **Section 3340.42**: Respondent Zepeda failed to conduct the required smog tests and  
13 inspections on those vehicles in accordance with the Bureau's specifications.

14 **EIGHTH CAUSE FOR DISCIPLINE**

15 **(Dishonesty, Fraud or Deceit - Respondent Zepeda)**

16 85. Respondent Zepeda's smog check inspector license is subject to discipline pursuant to  
17 Health and Safety Code section 44072.2, subdivision (d), in conjunction with Health and Safety  
18 Code section 44072.10 subdivision (c), in that regarding the vehicles set forth above in  
19 paragraphs 45-53 and 72-77, Respondent Zepeda committed acts involving dishonesty, fraud or  
20 deceit whereby another was injured by issuing electronic certificates of compliance for those  
21 vehicles without performing bona fide inspections of the emission control devices and systems on  
22 the vehicles., thereby depriving the People of the State of California of the protection afforded by  
23 the Motor Vehicle Inspection Program.

24 **NINTH CAUSE FOR DISCIPLINE**

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

26 86. Respondent Carrillo's smog check inspector license is subject to discipline pursuant  
27 to Health and Safety Code section 44072.2, subdivision (a), in that regarding the vehicles set forth  
28 above in paragraphs 30-44, Respondent Carrillo failed to comply with section 44012 of the

1 Health and Safety Code in a material respect, as follows: Respondent Carrillo failed to perform  
2 the emission control tests on those vehicles in accordance with procedures prescribed by the  
3 department.

4 **TENTH CAUSE FOR DISCIPLINE**

5 **(Failure to Comply with Regulations Pursuant to the Motor Vehicle Inspection Program –**  
6 **Respondent Carrillo)**

7 87. Respondent Carrillo's smog check inspector license is subject to discipline pursuant  
8 to Health and Safety Code section 44072.2, subdivision (c), in that regarding the vehicles set forth  
9 above in paragraphs 30-44, Respondent Carrillo failed to comply with provisions of the  
10 California Code of Regulations, title 16, as follows:

11 (a) **Section 3340.30, subdivision (a)**: Respondent Carrillo failed to inspect and test  
12 those vehicles in accordance with Health and Safety Code section 44012.

13 (b) **Section 3340.41, subdivision (c)**: Respondent Carrillo entered false information into  
14 the EIS.

15 (c) **Section 3340.42**: Respondent Carrillo failed to conduct the required smog tests and  
16 inspections on those vehicles in accordance with the Bureau's specifications.

17 **ELEVENTH CAUSE FOR DISCIPLINE**

18 **(Dishonesty, Fraud or Deceit - Respondent Carrillo)**

19 88. Respondent Carrillo's smog check inspector license is subject to discipline pursuant  
20 to Health and Safety Code section 44072.2, subdivision (d), in conjunction with Health and  
21 Safety Code section 44072.10 subdivision (c), in that regarding the vehicles set forth above in  
22 paragraphs 30-44, Respondent Carrillo committed acts involving dishonesty, fraud or deceit  
23 whereby another was injured by issuing electronic certificates of compliance for those vehicles  
24 without performing bona fide inspections of the emission control devices and systems on the  
25 vehicles., thereby depriving the People of the State of California of the protection afforded by the  
26 Motor Vehicle Inspection Program.

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1 **TWELFTH CAUSE FOR DISCIPLINE**

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

3 89. Respondent Mobasser’s smog check inspector license is subject to discipline pursuant  
4 to Health and Safety Code section 44072.2, subdivision (a), in that regarding the vehicles set forth  
5 above in paragraphs 56-64, and 66-71, Respondent Mobasser failed to comply with section 44012  
6 of the Health and Safety Code in a material respect, as follows: Respondent Carrillo failed to  
7 perform the emission control tests on those vehicles in accordance with procedures prescribed by  
8 the department.

9 **THIRTEENTH CAUSE FOR DISCIPLINE**

10 **(Failure to Comply with Regulations Pursuant to the Motor Vehicle Inspection Program –**  
11 **Respondent Mobasser)**

12 90. Respondent Mobasser’s smog check inspector license is subject to discipline pursuant  
13 to Health and Safety Code section 44072.2, subdivision (c), in that regarding the vehicles set forth  
14 above in paragraphs 56-64, and 66-71, Respondent Mobasser failed to comply with provisions of  
15 the California Code of Regulations, title 16, as follows:

16 (a) **Section 3340.30, subdivision (a):** Respondent Mobasser failed to inspect and test  
17 those vehicles in accordance with Health and Safety Code section 44012.

18 (b) **Section 3340.41, subdivision (c):** Respondent Mobasser entered false information  
19 into the EIS.

20 (c) **Section 3340.42:** Respondent Mobasser failed to conduct the required smog tests and  
21 inspections on those vehicles in accordance with the Bureau’s specifications.

22 **FOURTEENTH CAUSE FOR DISCIPLINE**

23 **(Dishonesty, Fraud or Deceit - Respondent Mobasser)**

24 91. Respondent Mobasser’s smog check inspector license is subject to discipline pursuant  
25 to Health and Safety Code section 44072.2, subdivision (d), in conjunction with Health and  
26 Safety Code section 44072.10 subdivision (c), in that regarding the vehicles set forth above in  
27 paragraphs 56-64, and 66-71, Respondent Mobasser committed acts involving dishonesty, fraud  
28 or deceit whereby another was injured by issuing electronic certificates of compliance for those



1 vehicles without performing bona fide inspections of the emission control devices and systems on  
2 the vehicles., thereby depriving the People of the State of California of the protection afforded by  
3 the Motor Vehicle Inspection Program.

4 **OTHER MATTERS**

5 92. Pursuant to Business & Professions Code section 9884.7, subdivision (c), the Director  
6 may suspend, revoke, or place on probation the registration for all places of business operated in  
7 this State by Respondent Jurupa V Smog upon a finding that Respondent Jurupa V Smog has, or  
8 is, engaged in a course of repeated and willful violations of the laws and regulations pertaining to  
9 an automotive repair dealer.

10 93. Pursuant to Health & Safety Code section 44072.8, if Smog Check, Test Only Station  
11 License Number TC 301891 issued to Respondent Jurupa V Smog is revoked or suspended  
12 following a hearing under this article, any additional license issued under Chapter 5, Part 5,  
13 Division 26 in the name of said licensee may be likewise revoked or suspended by the Director.

14 94. Pursuant to Health & Safety Code section 44072.8, if Smog Check Inspector License  
15 Number EO 644580 issued to Respondent Carrillo, is revoked or suspended following a hearing  
16 under this article, any additional license issued under Chapter 5, Part 5, Division 26 in the name  
17 of said licensee may be likewise revoked or suspended by the Director.

18 95. Pursuant to Health & Safety Code section 44072.8, if Smog Check Inspector License  
19 Number EO 635028, issued to Respondent Zepeda, is revoked or suspended following a hearing  
20 under this article, any additional license issued under Chapter 5, Part 5, Division 26 in the name  
21 of said licensee may be likewise revoked or suspended by the Director.

22 96. Pursuant to Health & Safety Code section 44072.8, if Smog Check Inspector License  
23 Number EO 644392, issued to Respondent Mobasser, is revoked or suspended following a  
24 hearing under this article, any additional license issued under Chapter 5, Part 5, Division 26 in the  
25 name of said licensee may be likewise revoked or suspended by the Director.

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**PRAYER**

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

1. Revoking or suspending Automotive Repair Dealer Registration Number ARD 301891, issued to Ubaldo C Zepeda dba Jurupa V Smog;
2. Revoking or suspending any other Automotive Repair Dealer Registration issued to Respondent Ubaldo C Zepeda;
3. Revoking or suspending Smog Check, Test-Only, Station License Number TC 301891, issued to Ubaldo C Zepeda dba Jurupa V Smog;
4. Revoking or suspending Smog Check Inspector License Number EO 635028, issued to Ubaldo Curiel Zepeda;
5. Revoking or suspending any additional license issued under Chapter 5 of Part 5 of Division 26 of the Health and Safety Code in the name of Respondent Ubaldo Curiel Zepeda;
6. Revoking or suspending Smog Check Inspector License Number EO 644580, issued to Ernesto Carrillo;
7. Revoking or suspending any additional license issued under Chapter 5 of Part 5 of Division 26 of the Health and Safety Code in the name of Respondent Ernesto Carrillo;
8. Revoking or suspending Smog Check Inspector License Number EO 644392, issued to Brandon Francisco Mobasser;
9. Revoking or suspending any additional license issued under Chapter 5 of Part 5 of Division 26 of the Health and Safety Code in the name of Respondent Brandon Francisco Mobasser;
10. Ordering Ubaldo C Zepeda, Ubaldo Curiel Zepeda, Ernesto Carrillo and Brandon Francisco Mobasser 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,

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

DATED: As of digital signature date

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

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