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

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| In the Matter of the Accusation Against:<br><br>**BRIAN'S AUTO CARE CENTER INC.**<br>**DBA BRIANS AUTO CARE CENTER,**<br>**BRIAN MOSTAFAI, PRESIDENT**<br>**BRIAN BAHRAM JR. MOSTAFAIE,**<br>**SECRETARY/TREASURER**<br>125 E 12th Street<br>Marysville, CA 95901<br><br>**Automotive Repair Dealer Registration No. ARD 206296**<br>**Smog Check, Test-and-Repair, Station License No. RC 206296**<br><br>Respondent. | Case No. 77/25-899<br><br>**ACCUSATION** |

## PARTIES

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

**Automotive Repair Dealer Registration**

2. In and around 1999, the Bureau issued Automotive Repair Dealer Registration Number ARD 206296 (registration) to Brian's Auto Care Center, Inc., dba Brians Auto Care Center (Respondent), with Brian Mostafai as president and Brian Bahram Jr. Mostafaie as

secretary and treasurer. The Automotive Repair Dealer Registration was in full force and effect at all times relevant to the charges brought herein and will expire on August 31, 2026, unless renewed.

**Smog Check, Test-and-Repair, Station License**

3. On or about August 1, 2025, the Bureau issued Smog Check, Test-and-Repair, Station License Number RC 206296 (station license) to Respondent. The Smog Check, Test-and-Repair, Station License was in full force and effect at all times relevant to the charges brought herein and will expire on August 31, 2026, unless renewed.

## JURISDICTION

4. This Accusation is brought before the Director of the Department of Consumer Affairs (Director) for the Bureau under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

5. Code section 118, subdivision (b), provides that the suspension, expiration, surrender or cancellation of a license shall not deprive the Director of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated.

6. Code section 477 provides, in pertinent part, that "Board" includes "bureau," "commission," "committee," "department," "division," "examining committee," "program," and "agency." "License" includes certificate, registration or other means to engage in a business or profession regulated by the Code.

7. Code section 9884.7 provides that the Director may revoke any automotive repair dealer registration.

8. Code section 9884.13 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.

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9. Health and Safety Code section 44002 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.

10. Health and Safety Code section 44072.6 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.

11. Health and Safety Code section 44072.8 states that 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.

**STATUTORY PROVISIONS**

12. Code section 9884.7 states, in pertinent part:

> (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.
>
> . . .
>
> (3) Failing or refusing to give to a customer a copy of any document requiring the customer's signature as soon as the customer signs the document.
>
> (4) Any other conduct that constitutes fraud.
>
> (5) Conduct constituting gross negligence.
>
> (6) Failure in any material respect to comply with the provisions of this chapter or regulations adopted pursuant to it.
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> . . . .

13. Code section 9884.8 states:

> All work done by an automotive repair dealer, including all warranty work, shall be recorded on an invoice and shall describe all service work done and parts supplied. Service work and parts shall be listed separately on the invoice, which shall

also state separately the subtotal prices for service work and for parts, not including sales tax, and shall state separately the sales tax, if any, applicable to each. If any used, rebuilt, or reconditioned parts are supplied, the invoice shall clearly state that fact. If a part of a component system is composed of new and used, rebuilt or reconditioned parts, that invoice shall clearly state that fact. The invoice shall include a statement indicating whether any crash parts are original equipment manufacturer crash parts or nonoriginal equipment manufacturer aftermarket crash parts. One copy of the invoice shall be given to the customer and one copy shall be retained by the automotive repair dealer.

14. Code section 9884.9, subdivision (a) states:

(a) The automotive repair dealer shall give to the customer a written estimated price for labor and parts necessary for a specific job, except as provided in subdivision (e). No work shall be done and no charges shall accrue before authorization to proceed is obtained from the customer. No charge shall be made for work done or parts supplied in excess of the estimated price, or the posted price specified in subdivision (e), without the oral or written consent of the customer that shall be obtained at some time after it is determined that the estimated or posted price is insufficient and before the work not estimated or posted is done or the parts not estimated or posted are supplied. Written consent or authorization for an increase in the original estimated or posted price may be provided by electronic mail or facsimile transmission from the customer. The bureau may specify in regulation the procedures to be followed by an automotive repair dealer if an authorization or consent for an increase in the original estimated price is provided by electronic mail or facsimile transmission. If that consent is oral, the dealer shall make a notation on the work order of the date, time, name of person authorizing the additional repairs, and telephone number called, if any, together with a specification of the additional parts and labor and the total additional cost . . .

15. Health and Safety Code section 44072.2 states, in pertinent part:

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:

. . .

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

. . . .

**REGULATORY PROVISIONS**

16. California Code of Regulations, title 16, (CCR) section 3353, states:

An estimate shall be provided to and authorized by the customer before any work commences. The estimate shall meet the requirements of Business and Professions Code section 9884.9 as well as the following:

(a) Estimate for Parts and Labor. Every automotive repair dealer shall give to each customer an estimate containing the estimated price for parts and labor for a specific job prior to obtaining authorization. Each part listed in the estimate shall be

new unless specifically identified as a used, rebuilt, or reconditioned part.

(b) Estimate for Auto Body or Collision Repairs. Every automotive repair dealer, when doing auto body or collision repairs, shall give to each customer an itemized estimate containing the estimated price for parts and labor for a specific job. Parts and labor shall be described separately and each part shall be listed in the estimate. Each part listed in the estimate shall be new unless specifically identified as a used, rebuilt or reconditioned part. Each new replacement crash part listed in the estimate shall be an original equipment manufacturer (OEM) part unless specifically identified as a non-OEM aftermarket crash part.

(c) Teardown Estimates.

If it is necessary to tear down a vehicle or vehicle component in order to diagnose, the automotive repair dealer shall do all of the following:

(1) Estimate of teardown. The automotive repair dealer shall first give the customer an estimate for the teardown and obtain authorization for the teardown. The estimate shall include the following:

(A) The cost of reassembling the vehicle or component.

(B) The cost of all parts and labor necessary to replace items that are normally destroyed by teardown of the vehicle or component such as gaskets, seals and O rings.

(C) If applicable, notification that the act of teardown might prevent the restoration of the vehicle or component to the condition in which it was provided by the customer.

(D) The maximum time it will take the automotive repair dealer to reassemble the vehicle or component in the event the customer elects not to proceed with the repair or maintenance of the vehicle. The automotive repair dealer shall reassemble the vehicle or component within the time period specified in the teardown estimate. The maximum time shall be counted from the date of authorization of the teardown.

(2) Itemized estimate for repair after teardown. Upon completion of the teardown, the automotive repair dealer shall give the customer an itemized estimate for labor and parts necessary for the required repair. The automotive repair dealer shall then obtain the customer's authorization for either repair or reassembly before any further diagnosis or repair is done or charges accrue.

(3) If, after teardown, a customer declines repair or reassembly, the automotive repair dealer shall, as applicable, document on the teardown invoice that the customer declined repair or reassembly.

(d) Sublet Disclosure. No automotive repair shall be done by someone other than the automotive repair dealer or his or her employees without the consent of the customer, unless the customer cannot reasonably be notified. An automotive repair dealer shall include with the estimate a statement of any sublet repair to be performed on the vehicle. If requested by the customer, an automotive repair dealer shall disclose the name and location of the facility performing the sublet repair.

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17. CCR, section 3353.1, subdivision (a) states:

No diagnosis or repair, including no-charge and warranty repairs, shall commence and no charges shall accrue without specific authorization from the customer. Any estimate or revised work order provided to the customer shall be authorized by the customer or the customer's designee in written, oral, or electronic form.

18. CCR, section 3354 states:

(a) Exceeding Original Estimate. Except as provided in subsection (c), before any additional diagnosis or repair is commenced, and before any additional charges accrue for labor or parts in excess of the original estimated and authorized price, the automotive repair dealer shall:

(1) give the customer an estimate that describes all additional parts and labor, provides the cost of all additional parts and labor, and provides a total revised cost; and

(2) obtain customer authorization and record the authorization as specified in sections 3353.1 and 3356 of this Article and section 9884.9 of the Business and Professions Code.

. . . .

19. CCR, section 3356 states, in pertinent part:

. . .

(c) The invoice shall separately list, describe and identify all of the following:

(1) All services and repairs performed, including any diagnosis or warranty repairs, and the prices for each.

(2) Each part supplied, in such a manner that the customer can understand what was purchased, and the price for each described part. The description of each part shall state whether the part was new, used, reconditioned, rebuilt, an OEM crash part, or a non-OEM aftermarket crash part. Part kits containing several components may be listed as a single part on the invoice and identified by brand name and corresponding part number or similar designation.

. . . .

20. CCR, section 3371, states:

No automotive repair dealer shall publish, utter, or make or cause to be published, uttered, or made any false or misleading statement or advertisement which is known to be false or misleading, or which by the exercise of reasonable care should be known to be false or misleading. Advertisements and advertising signs shall clearly show the name and address listed on the automotive repair dealer's State registration certificate.

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21. CCR, 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(e) of this chapter, withhold therefrom or insert therein any statement or information which will cause any such document to be false or misleading, or where the tendency or effect thereby would be to mislead or deceive customers, prospective customers, or the public.

## COST RECOVERY

22. Code section 125.3 provides, in pertinent part, that a Board may request the administrative law judge to direct a licentiate 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.

## UNDERCOVER OPERATION #1 – 2007 FORD

23. On and between September 4, 2024, through November 14, 2024, a Bureau representative documented the brake system on the Bureau's 2007 Ford. The representative confirmed the brake system was operating within manufacturer's specifications. A malfunction to the brake fluid level switch was introduced to cause the red brake warning light to illuminate and the brake fluid was documented at the minimum level indicator of the brake master cylinder reservoir. Also, the brake pads and rotors were documented in good working condition and not in need of replacement. The only repair necessary to correct the illuminated red brake warning light was to properly diagnose the failed brake fluid level switch, replace the fluid level sensor and add brake fluid to the master cylinder reservoir.

24. On or about January 14, 2025, a Bureau undercover operator (operator) drove the documented 2007 Ford to Respondent's facility, Brians Auto Care Center. The operator met with president Brian Mostafai (Mostafai), on behalf of Respondent, regarding her appointment to have the brake warning light diagnosed. Mostafai gave the operator an estimate to sign that did not have any prices for the work listed on the estimate. Also, Mostafai did not provide the operator with a signed copy of the estimate or any verbal cost estimate. Later that day, Mostafai called the operator and said the 2007 Ford needed its front and rear brakes replaced and a brake fluid flush. Respondent explained that the brakes had overheated and were glazed. Mostafai also said the

rear brakes would need to be replaced within three to six months because they were at 40%. Mostafai told the operator that the cost to make the repairs would be $953.17. The operator asked Mostafai for clarification as to what repairs needed to be done to fix the warning light. Mostafai stated that the front brakes and the brake fluid flush needed to be repaired now and the rear brakes could wait. The operator verbally authorized the repairs for the front brake replacement and the brake fluid flush.

25. A few hours later, Mostafai contacted the operator and told her that the repairs were completed, but there was an issue getting the brake warning sensor to reset and that the sensor might need to be replaced. Shortly after, a person who identified himself as Junior, on behalf of Respondent, contacted the operator and said that they had been able to reset the sensor. The operator arrived at Respondent's facility and spoke with Junior who told her that the Ford's rear brakes would need to be replaced soon because they were old and would overwork the front brakes. Respondent received an invoice for $486.89 and asked Junior to note on the invoice which brake repairs still needed to be completed.

26. On or about January 15, 2025, a Bureau representative performed a post-run inspection on the 2007 Ford using the invoice from Respondent's facility and found the following: (1) Respondent had unnecessarily replaced the left and right front brake rotors and front brake pads; (2) the measurements listed on the invoice for the front brake pads and rotors were not accurate; (3) the invoice showed a charge for a brake fluid flush, which Respondent had not performed and had not been needed; and, (4) Respondent had disconnected the brake fluid level switch connector thereby disabling the warning system for a low brake fluid level condition, leaving the vehicle in an unsafe condition.

**FIRST CAUSE FOR DISCIPLINE**

**(Untrue and Misleading Statements and Records)**

27. Respondent's registration is subject to disciplinary action under Code section 9884.7, subdivision (a)(1), in conjunction with CCR, section 3371 and 3373, in that Respondent made statements which Respondent knew or by exercise of reasonable care should have known were untrue or misleading, as set forth above in paragraphs 23 through 26 and as follows:

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a. Respondent told the Bureau operator that the front and rear brake needed to be replaced, when, in fact, they were in good working order and did not need replacing;

b. Respondent told the Bureau operator that a brake fluid flush was needed when, in fact, the only repair needed was to replace the fluid level sensor and add brake fluid to the master cylinder reservoir;

c. Respondent stated on the invoice that the rear brake pads and rotors needed to be replaced, when they were in good working order and did not need replacement;

d. Respondent inaccurately documented the measurements of the brake pads and rotors on the invoice; and/or,

e. Respondent stated on the invoice that a brake fluid flush had been performed when it had not.

**SECOND CAUSE FOR DISCIPLINE**

**(Fraud)**

28. Respondent's registration subject to disciplinary action under Code section 9884.7, subdivision (a)(4), in that it committed fraud by charging for a brake fluid flush that was not performed and charged to replace the front brake pads and rotors that did not need to be replaced, as set forth above in paragraphs 23 through 26 and incorporated herein by reference.

**THIRD CAUSE FOR DISCIPLINE**

**(Gross Negligence)**

29. Respondent's registration is subject to disciplinary action under Code section 9884.7, subdivision (a)(5), in that Respondent committed acts that constitute gross negligence by intentionally defeating the brake fluid level sensor leaving the 2007 Ford in an unsafe condition, as set forth above in paragraphs 23 through 26 and incorporated herein by reference.

**FOURTH CAUSE FOR DISCIPLINE**

**(Failure to Comply with the Automotive Repair Act - Estimate and Authorization Requirements)**

30. Respondent's registration is subject to disciplinary action under Code section 9884.7, subdivision (a)(6), in that Respondent failed to comply with the Automotive Repair Act by

violating Code section 9884.9, subdivision (a). Specifically, Respondent failed to provide the Bureau operator with an estimated cost of the repairs, as set forth above in paragraph 24 and incorporated herein by reference.

**FIFTH CAUSE FOR DISCIPLINE**

**(Failure to Give a Customer a Copy of a Signed Document When Signed)**

31. Respondent's registration is subject to disciplinary action under Code section 9884.7, subdivision (a)(3), in that Respondent failed to provide the customer with a copy of the signed estimate, as set forth above in paragraph 24 and incorporated herein by reference.

**UNDERCOVER OPERATION #2 – 2004 FORD**

32. On and between February 20, 2025, through March 21, 2025, a Bureau representative documented the powertrain management system, fuel, and ignition systems on the Bureau's 2004 Ford. A defective fuel injector was introduced to cylinder #5 of the engine, causing the Malfunction Indicator Lamp (MIL) to illuminate and the engine to run rough. The only repair necessary to correct the illuminated MIL was to replace the faulty cylinder #5 fuel injector.

33. On or about April 15, 2025, a Bureau operator (operator) went to Respondent's facility and spoke with an unidentified man on behalf of Respondent. The operator told the man that the engine did not feel right, had a flashing warning light, and asked for a diagnosis The man identified the flashing warning light as the check engine light and gave the operator a document to sign with an estimated price of $155.00. The operator was not given a copy of the signed estimate before the operator left the facility. A few hours later, the operator spoke on the telephone with an unidentified man at Respondent's facility who said that Respondent found multiple misfire codes for the engine and that required further testing. Later, the operator spoke with another unidentified man at Respondent's facility who stated that Respondent had found no issues with the spark plugs and coils and that additional testing was needed, including a compression test and a cylinder leak down test. The man told the operator it would cost an additional $175.00 to do a cylinder leak down test, but did not provide an updated total cost. The operator verbally authorized the testing.

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34. The next day, the operator received a call from Mostafai on behalf of Respondent who said he had found low compression in cylinder #5 of the engine. Mostafai explained that both cylinder heads needed to be removed, inspected and repaired by a sublet machine repair shop. Mostafai confirmed with the operator that inspecting and repairing the cylinder heads would repair the flashing warning light and the rough-running engine. The operator asked Mostafai for a total cost and Mostafai stated it would be between $2,500.00 and $3,500.00 depending on which machine shop could do the repairs. Mostafai never gave the operator an estimate for the parts Respondent would use and told the operator it would take two to three weeks to complete. The operated verbally authorized the repairs.

35. On or about May 5, 2025, the operator spoke with Mostafai, who said that Respondent had found an issue with a fuel injector on the back of the engine and that he had "made an executive decision" to replace it as preventative maintenance. Mostafai did not provide a cost to replace the injector and did not provide an updated total cost for repairs. The next day, the operator went to Respondent's facility and spoke with an unidentified man who said that Respondent had put oil in the engine and asked the operator to bring the 2004 Ford back when it was due for an oil change. The man also told the operator to bring the 2004 Ford back for a brake inspection soon because that the brakes might need to be cleaned or replaced. The man gave the operator a copy of the invoice for $3,710.02.

36. On or about May 8, 2025, a Bureau representative performed a post-run inspection on the 2004 Ford using the invoice from Respondent's facility and found the following: (1) Respondent incorrectly documented that the defective fuel injector that Respondent replaced was on cylinder #1 when it was cylinder #5; (2) Respondent did not document the results of any leak down or injector balance tests; (3) Respondent partially documented the compression tests results; (4) Respondent documented on the invoice that the engine compression was low when, in fact, the engine compression was within manufacturer's specification; and (5) Respondent's removal and sublet repair of the cylinder heads was unnecessary.

37. Additionally, Respondent failed to document the operator's additional authorizations on the invoice and had charged $3,200.00 for cylinder head repairs that were not needed.

**SIXTH CAUSE FOR DISCIPLINE**

**(Untrue and Misleading Statements and Records)**

38. Respondent's registration is subject to disciplinary action under Code section 9884.7, subdivision (a)(1), in conjunction with CCR, section 3371 and 3373, in that Respondent made statements which Respondent knew or by exercise of reasonable care should have known were untrue or misleading, as set forth above in paragraphs 32 through 37, as follows:

a. Respondent told the Bureau operator that both cylinder heads needed to be removed, inspected, and repaired when the only repair needed was to replace the faulty cylinder #5 fuel injector; and,

b. Respondent told the Bureau operator that the brake rotors might need to be cleaned or replaced soon when they were in good working order and did not then need cleaning or replacing at all.

**SEVENTH CAUSE FOR DISCIPLINE**

**(Fraud)**

39. Respondent's registration is subject to disciplinary action under Code section 9884.7, subdivision (a)(4), in that Respondent committed fraud when performing repairs on the 2004 Ford by charging approximately $3,200.00 for cylinder head repairs that were not needed to fix the MIL, as set forth above in paragraphs 32 through 37 and incorporated herein by reference.

**EIGHTH CAUSE FOR DISCIPLINE**

**(Failure to Comply with the Automotive Repair Act - Invoice Requirements)**

40. Respondent's registration is subject to disciplinary action under Code section 9884.7, subdivision (a)(6), in that Respondent failed to comply with the Automotive Repair Act when by violating Code section 9884.8 and CCR, section 3356, subdivisions (c)(1) and (c)(2). Specifically, Respondent did not properly and accurately record on the invoice all the repairs and diagnostics performed on the 2004 Ford, as set forth above in paragraphs 33 and 36 and incorporated herein by reference.

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**NINTH CAUSE FOR DISCIPLINE**

**(Failure to Comply with the Automotive Repair Act - Estimate and Authorization Requirements)**

41. Respondent's registration is subject to disciplinary action under Code section 9884.7, subdivision (a)(6), in that Respondent failed to comply with the Automotive Repair Act by violating Code section 9884.9, subdivision (a), CCR, section 3353.1, subsection (a), CCR, section 3354, subsections (a)(1) and (a)(2), regarding estimate and authorization requirements, as follows:

a. Respondent failed to provide the Bureau operator with a copy of the signed estimate for the 2004 Ford; as set forth above in paragraph 33 and incorporated herein by reference;

c. Respondent failed to document the additional authorizations for repairs on the 2004 Ford's invoice, as set forth above in paragraphs 33 through 37 and incorporated herein by reference; and/or,

d. Respondent replaced a fuel injector on the 2004 Ford without obtaining authorization, as set forth above in paragraphs 35 and incorporated herein by reference.

**TENTH CAUSE FOR DISCIPLINE**

**(Failure to Give a Customer a Copy of a Signed Document When Signed)**

42. Respondent's registration is subject to disciplinary action under Code section 9884.7, subdivision (a)(3), in that Respondent failed to provide the customer with a copy of the signed estimate, as set forth above in paragraph 33 and incorporated herein by reference.

**ELEVENTH CAUSE FOR DISCIPLINE**

**(Dishonest, Fraud or Deceit)**

43. Respondent's station license is subject to disciplinary action under Health and Safety Code section 44072.2, subdivision (d), in that Respondent committed dishonest, fraudulent, or deceitful acts whereby another was injured, as set forth in paragraphs 23 through 26 and 32 through 37, and incorporated herein by reference.

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## MATTERS IN AGGRAVATION

44. To determine the degree of discipline, if any, to be imposed, Complainant alleges as follows: On or about January 23, 2024, the Bureau held a proactive conference with president Brian Mostafai on behalf of Respondent. The conference was held to discuss compliance concerns regarding violations of Code section 9884.7, subdivisions (a)(1) (untrue and misleading statements) and (a)(2) (allowing customer to sign a work order without listing the vehicle's odometer reading at time of repair); 9884.8 (failure to comply with invoice requirements); 9884.9, subdivision (a) (failure to comply with estimate and authorization requirements); CCR, sections 3353, subsection (a) (failure to provide a customer with an estimated price for parts and labor prior to obtaining authorization), 3354, subsection (a)(2) (failure to record authorization prior to additional diagnosis or repair is commenced), and 3356, subsection (c)(1) (failure to record all services and repairs performed and the price for each). Respondent was advised that the conference was held to allow corrective action and that a station inspection, documented vehicle, or data review may be employed to confirm compliance Respondent was also advised to follow all laws and regulations of the Automotive Repair Act. Respondent was informed that future violations of the Automotive Repair Act could result in disciplinary action, which could jeopardize Respondent's Automotive Repair Dealer Registration Number ARD 206296.

## OTHER MATTERS

45. 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 Respondent, upon a finding that he has or is engaged in a course of repeated and willful violation of the laws and regulations pertaining to an automotive repair dealer.

46. Pursuant to Health and Safety Code section 44072.8, if Smog Check, Test-and-Repair, Station License Number RC 206296, issued to Respondent is revoked or suspended, any additional license issued under Chapter 5 of Part 5 of Division 26 of the Health and Safety Code in the name of said licensee may be likewise revoked or suspended by the director.

## PRAYER

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

1. Revoking or suspending Automotive Repair Dealer License Number ARD 206296, issued to Brian's Auto Care Center Inc. dba Brians Auto Care Center with Brian Mostafai as president and Brian Bahram Jr. Mostafaie as secretary and treasurer;

2. Revoking or suspending any other automotive repair dealer registration issued to Brian's Auto Care Center Inc.;

3. Revoking or suspending Smog Check, Test-and-Repair, Station License Number RC 206296, issued to Brian's Auto Care Center Inc. dba Brians Auto Care Center with Brian Mostafai as president and Brian Bahram Jr. Mostafaie as secretary and treasurer;

4. Revoking or suspending any additional license issued under Chapter 5 of Part 5 of Division 26 of the Health and Safety Code issued to Brian's Auto Care Center Inc.;

5. Ordering Respondent to pay the Bureau the reasonable costs of the investigation and enforcement of this case, pursuant to Code section 125.3 and, if placed on probation, the costs of probation monitoring; and,

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

DATED: As of Digital Signature Date

Dorais, Patrick@DCA

Digitally signed by Dorais, Patrick@DCA
Date: 2026.02.09 13:16:57 -08'00'

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

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