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

12 In the Matter of the Accusation Against:
13 **JONG WON PYUN dba JOHN'S AUTO 76**
2702 E. Firestone Blvd.
South Gate, CA 90280
14
Automotive Repair Dealer Reg. No. ARD 263894
15 Smog Check Station License No. RC 263894
Lamp Station License No. LS 263894
16 Brake Station License No. BS 263894
17 **and**
18 **JONG WON PYUN**
2702 E. Firestone Blvd.
19 South Gate, CA 90280
20 Smog Check Inspector License No. EO 29379
Smog Check Repair Technician License No. EI
21 29379 (*formerly Advanced Emission Specialist*
Technician EA 29379)
22
Lamp Adjuster License No. LA 29379
23 Brake Adjuster License No. BA 29379
24 Respondents.

Case No. **77/16-43**

A C C U S A T I O N

25 Complainant alleges:

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

3 **ARD & Station Licenses**

4 2. On or about January 26, 2011, the Bureau of Automotive Repair issued Auto Repair
5 Dealer Registration Number ARD 263894 to Jong Won Pyun, dba John's Auto 76. The Auto
6 Repair Dealer Registration was in full force and effect at all times relevant to the charges brought
7 herein and will expire on January 31, 2017, unless renewed.

8 3. On or about February 2, 2011, the Bureau of Automotive Repair issued Smog Check
9 Station License Number RC 263894 to Jong Won Pyun, dba John's Auto 76. The Smog Check
10 Station License was in full force and effect at all times relevant to the charges brought herein and
11 will expire on January 31, 2017, unless renewed.

12 4. On or about February 2, 2011, the Bureau of Automotive Repair issued Lamp Station
13 License No. LS 263894 to Jong Won Pyun, dba John's Auto 76. The Lamp Station License was
14 in full force and effect at all times relevant to the charges brought herein and will expire on
15 January 31, 2017, unless renewed.

16 5. On or about February 2, 2011, the Bureau of Automotive Repair issued Brake Station
17 License No. BS 263894 to Jong Won Pyun, dba John's Auto 76. The Brake Station License was
18 in full force and effect at all times relevant to the charges brought herein and will expire on
19 January 31, 2017, unless renewed.

20 **Adjuster & Technician Licenses**

21 6. In 1996, the Bureau of Automotive Repair issued Advanced Emission Specialist
22 Technician License EA 29379 to Jong Won Pyun. Pursuant to California Code of Regulations,
23 title 16, section 3340.28, subdivision (e), upon Respondent's election, said license was renewed
24 as Smog Check Inspector License Number EO 29379 and Check Repair Technician License
25 Number EI 29379, effective December 9, 2013. The Smog Check Inspector License and Check
26 Repair Technician License were in full force and effect at all times relevant to the charges
27 brought herein and will expire on March 31, 2018, unless renewed.

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(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.

....

(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.

14. Bus. & Prof. Code section 9889.3 states, in pertinent part:

The director may suspend, revoke, or take other disciplinary action against a license as provided in this article [Article 7 (commencing with section 9889.1) of the Automotive Repair Act] if the licensee or any partner, officer, or director thereof:

(a) Violates any section of the Business and Professions Code which relates to his or her licensed activities.

....

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

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

....

(h) Violates or attempts to violate the provisions of this chapter relating to the particular activity for which he or she is licensed . . .

15. Bus. & Prof. 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."

1 16. Bus. & Prof. Code section 9889.16 states:

2 Whenever a licensed adjuster in a licensed station upon an inspection or
3 after an adjustment, made in conformity with the instructions of the bureau,
4 determines that the lamps or the brakes upon any vehicle conform with the
5 requirements of the Vehicle Code, he shall, when requested by the owner or driver of
6 the vehicle, issue a certificate of adjustment on a form prescribed by the director,
7 which certificate shall contain the date of issuance, the make and registration number
8 of the vehicle, the name of the owner of the vehicle, and the official license of the
9 station.

7 17. Bus. & Prof. Code section 9889.22 states:

8 The willful making of any false statement or entry with regard to a
9 material matter in any oath, affidavit, certificate of compliance or noncompliance, or
10 application form which is required by this chapter [the Automotive Repair Act] or
11 Chapter 5 (commencing with Section 44000) of Part 5 of Division 26 of the Health
12 and Safety Code constitutes perjury and is punishable as provided in the Penal Code.

11 18. Bus. & Prof. Code section 9889.9 states that “[w]hen any license has been revoked or
12 suspended following a hearing under the provisions of this article [Article 7 (commencing with
13 section 9889.1) of the Automotive Repair Act], any additional license issued under Articles 5 and
14 6 of this chapter in the name of the licensee may be likewise revoked or suspended by the
15 director.”

16 19. Section 44072.2 of the Health and Safety Code states:

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

20 “(a) Violates any section of this chapter and the regulations adopted pursuant to this chapter

21 ...

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

23 ...

24 “(f) Aids or abets unlicensed persons to evade the provisions of this chapter.

25 20. Health & Saf. Code section 44072.8 states that when a license has been revoked or
26 suspended following a hearing under this article, any additional license issued under this chapter
27 in the name of the licensee may be likewise revoked or suspended by the director.

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1 required by law and that the vehicle had passed the inspections. In addition, the Brake
2 Adjustment Certification falsely indicated that the vehicle had been road tested and stopped
3 within 25 feet from a speed of 20 miles per hour.

4 25. On April 7 and 8, 2015, the Bureau program representative at the Bureau's vehicle
5 documentation lab re-inspected the 2000 Honda and found that tamper seals were still in place
6 and that the right front brake rotor and rear brake rotor were, as previously documented, still
7 undersized to dimensions that were outside of the manufacturer's minimum thickness
8 specifications. The program representative also determined that the left headlamp was still out of
9 proper adjustment for certification and that the license plate lamp bulb was still defective.

10 2002 Honda

11 26. In April 2015, a Bureau program representative at one of the Bureau's vehicle
12 documentation labs documented the condition of one of the Bureau's undercover vehicles, a 2002
13 Honda. At that time, the program representative machined the right front brake rotor and left
14 rear brake drum to measurements that were outside of the manufacturer's specifications for
15 discard. The program representative also moved the left and right headlamps out of proper
16 adjustment and installed a defective light bulb in the vehicle's left rear brake/tail light assembly.
17 As a result of these defects, the vehicle was not capable of passing proper inspections for brake
18 and lamp certifications.

19 27. On April 24, 2015, an undercover operator of the Bureau took the Bureau-
20 documented 2002 Honda to Respondent's facility and requested brake, lamp, and smog
21 inspections on the vehicle. Respondent agreed to provide the inspections but did not provide a
22 written estimate to the undercover operator before commencing any work. At the conclusion of
23 the inspections, Respondent provided the undercover operator with Certificate of Brake
24 Adjustment No. BC 2031554 and Certificate of Lamp Adjustment No. LC 1998355, both signed
25 under penalty of perjury by Respondent attesting that he had performed the inspections as
26 required by law and that the vehicle had passed the inspections. In addition, the Brake
27 Adjustment Certification falsely indicated that the vehicle had been road tested and stopped
28 within 25 feet from a speed of 20 miles per hour.

1 28. On April 30, 2015, the Bureau program representative at the Bureau's vehicle
2 documentation lab re-inspected the 2002 Honda and found that tamper seals were still in place
3 and that the right front brake rotor and left rear brake drum were, as previously documented, still
4 outside manufacturer's specifications for discard. The program representative also determined
5 that the left headlamp was still out of proper adjustment for certification.

6 **2002 Honda**

7 29. In April 2015, a Bureau program representative at one of the Bureau's vehicle
8 documentation labs documented the condition of one of the Bureau's undercover vehicles,
9 another 2002 Honda. At that time, the program representative machined the right front brake
10 rotor and left rear brake rotor to measurements that were outside of the manufacturer's
11 specifications for discard. The program representative also moved the left and right headlamps
12 out of proper adjustment and installed a defective license plate lamp bulb. As a result of these
13 defects, the vehicle was not capable of passing proper inspections for brake and lamp
14 certifications.

15 30. On May 6, 2015, an undercover operator of the Bureau took the Bureau-documented
16 2002 Honda to Respondent's facility and requested brake, lamp, and smog inspections on the
17 vehicle. Respondent agreed to provide the inspections but did not provide a written estimate to
18 the undercover operator before commencing any work. At the conclusion of the inspections,
19 Respondent provided the undercover operator with Certificate of Brake Adjustment No. BC
20 2031586 and Certificate of Lamp Adjustment No. LC 1998387, both signed under penalty of
21 perjury by Respondent attesting that he had performed the inspections as required by law and that
22 the vehicle had passed the inspections. In addition, the Brake Adjustment Certification falsely
23 indicated that the vehicle had been road tested and stopped within 25 feet from a speed of 20
24 miles per hour.

25 31. On May 7, 2015, the Bureau program representative at the Bureau's vehicle
26 documentation lab re-inspected the 2002 Honda and found that tamper seals were still intact and
27 that the right front brake rotor and left rear brake rotor were, as previously documented, still
28 outside manufacturer's specifications for discard. The program representative also determined

1 that the left and right headlamps were still out of proper adjustment for certification and that the
2 license plate lamp bulb was still defective.

3 **FIRST CAUSE FOR DISCIPLINE**

4 **(Untrue or Misleading Statements)**

5 32. Respondent Jong Won Pyun's, dba John's Auto 76, Automotive Repair Dealer
6 registration is subject to disciplinary action pursuant to Bus. & Prof. Code section 9884.7,
7 subdivision (a)(1), in that Respondent made or authorized statements which he knew or in the
8 exercise of reasonable care should have known to be untrue or misleading, as follows:

9 a. Respondent falsely certified under penalty of perjury on brake certificates that the
10 brake components on the Bureau's undercover vehicles were in a satisfactory condition. Further,
11 Respondent falsely certified that the Bureau's undercover vehicles had been road tested.

12 b. Respondent falsely certified under penalty of perjury that the headlamps and external
13 vehicle lights on the Bureau's undercover vehicles were functioning and properly adjusted.

14 Complainant refers to, and by this reference incorporates, the allegations contained in
15 paragraphs 23 through 31, inclusive, as though set forth fully herein.

16 **SECOND CAUSE FOR DISCIPLINE**

17 **(Fraud)**

18 33. Respondent Jong Won Pyun's, dba John's Auto 76, Automotive Repair Dealer
19 registration is subject to disciplinary action pursuant to Bus. & Prof. Code section 9884.7,
20 subdivision (a)(4), in that Respondent committed acts that constitute fraud by obtaining payment
21 from Bureau operators for performing the applicable inspections, adjustments and/or repairs of
22 the brake and lighting systems on the Bureau's undercover vehicles as specified by the Bureau
23 and in accordance with the Vehicle Code. In fact, Respondent failed to perform the necessary
24 inspections, adjustments, and repairs in compliance with Bureau Regulations or the Vehicle Code.
25 Complainant refers to, and by this reference incorporates, the allegations contained in paragraphs
26 23 through 31, inclusive, as though set forth fully herein.

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1 **THIRD CAUSE FOR DISCIPLINE**

2 **(Gross Negligence)**

3 34. Respondent Jong Won Pyun's, dba John's Auto 76, Automotive Repair Dealer
4 registration is subject to disciplinary action pursuant to Bus. & Prof. Code section 9884.7,
5 subdivision (a)(5), in that Respondent engaged in acts constituting gross negligence.
6 Complainant refers to, and by this reference incorporates, the allegations contained in paragraphs
7 23 through 31, inclusive, as though set forth fully herein.

8 **FOURTH CAUSE FOR DISCIPLINE**

9 **(Failure to Comply with the Bus. & Prof. Code)**

10 35. Respondent Jong Won Pyun's, dba John's Auto 76, Automotive Repair Dealer
11 registration is subject to disciplinary action pursuant to Bus. & Prof. Code section 9884.7,
12 subdivision (a)(6), in that Respondent failed to comply with provisions of that Code in the
13 following material respects:

- 14 a. **Section 9889.16:** Respondent issued brake and lamp certificates to Bureau
15 undercover vehicles that were not in compliance with Bureau Regulations or the requirements of
16 the Vehicle Code.
- 17 b. **Section 9889.22:** Respondent willfully made false statements or entries on brake and
18 lamp certificates issued to Bureau undercover vehicles.

19 Complainant refers to, and by this reference incorporates, the allegations contained in
20 paragraphs 23 through 31, inclusive, as though set forth fully herein.

21 **FIFTH CAUSE FOR DISCIPLINE**

22 **(Violations of Regulations)**

23 36. Respondent Jong Won Pyun's, dba John's Auto 76, Automotive Repair Dealer
24 registration is subject to disciplinary action pursuant to Bus. & Prof. Code section 9884.7,
25 subdivision (a)(6), in that Respondent failed to comply with provisions of California Code of
26 Regulations, title 16, in the following material respects:

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1 a. **Section 3305, subdivision (a)**: Respondent failed to inspect the brake systems or
2 inspect and adjust the lamp systems on the Bureau's undercover vehicles in accordance with the
3 specifications, instructions, and directives issued by the Bureau and the vehicle manufacturer.

4 b. **Section 3316, subdivision (d)(2)**: Respondent issued lamp certifications to the
5 Bureau's undercover vehicles when all of the lamps, lighting equipment, and/or related electrical
6 systems on the vehicles were not in compliance with Bureau regulations.

7 c. **Section 3321, subdivision (c)(2)**: Respondent issued brake certifications to the
8 Bureau's undercover vehicles when the brake systems on the vehicles had not been appropriately
9 tested or inspected.

10 d. **Section 3353, subdivision (a)**: Respondent failed to provide written estimates to
11 Bureau operators prior to commencing work for compensation on the undercover vehicles.

12 Complainant refers to, and by this reference incorporates, the allegations contained in
13 paragraphs 23 through 31, inclusive, as though set forth fully herein.

14 **SIXTH CAUSE FOR DISCIPLINE**

15 **(Failure to Comply with the Bus. & Prof. Code)**

16 37. Respondent Jong Won Pyun's, dba John's Auto 76, brake and lamp station licenses
17 are subject to disciplinary action pursuant to Bus. & Prof. Code section 9889.3, subdivisions (a)
18 and (h), in that Respondent violated the provisions of Bus. & Prof. Code sections 9884.9,
19 subdivision (a), 9889.16, and 9889.22 relating to Respondent's licensed activities. Complainant
20 refers to, and by this reference incorporates, the allegations contained in paragraphs 23 through
21 31, inclusive, as though set forth fully herein.

22 **SEVENTH CAUSE FOR DISCIPLINE**

23 **(Failure to Comply with Regulations)**

24 38. Respondent Jong Won Pyun's, dba John's Auto 76, brake and lamp station licenses
25 are subject to disciplinary action pursuant to Bus. & Prof. Code section 9889.3, subdivision (c), in
26 that Respondent failed to comply with the provisions of California Code of Regulations, title 16,
27 sections 3305, subdivision (a), 3316, subdivision (d)(2), and 3321, subdivision (c)(2).

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1 Complainant refers to, and by this reference incorporates, the allegations contained in paragraphs
2 23 through 31, inclusive, as though set forth fully herein.

3 **EIGHTH CAUSE FOR DISCIPLINE**

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

5 39. Respondent Jong Won Pyun's, dba John's Auto 76, brake and lamp station licenses
6 are subject to disciplinary action pursuant to Bus. & Prof. Code section 9889.3, subdivision (d), in
7 that Respondent committed acts involving dishonesty, fraud, or deceit whereby another was
8 injured. Complainant refers to, and by this reference incorporates, the allegations contained in
9 paragraphs 23 through 31, inclusive, as though set forth fully herein.

10 **NINTH CAUSE FOR DISCIPLINE**

11 **(Issuance of False/Fraudulent Smog Certification)**

12 40. Respondent Jong Won Pyun's, dba John's Auto 76, smog station license registration
13 is subject to disciplinary action pursuant to California Code of Regulations, title 16, section
14 3340.24, subdivision (c), in that Respondent falsely and/or fraudulently issued a certificate of
15 compliance to the Bureau's undercover 2000 Honda on April 7, 2015. Complainant refers to,
16 and by this reference incorporates, the allegations contained in paragraphs 23 through 25,
17 inclusive, as though set forth fully herein.

18 **TENTH CAUSE FOR DISCIPLINE**

19 **(Dishonest Acts)**

20 41. Respondent Jong Won Pyun's, dba John's Auto 76, smog station license is subject to
21 disciplinary action pursuant to Health and Safety Code section 44072.2, subdivision (d), in that
22 Respondent committed acts involving dishonesty, fraud, and/or deceit whereby another was
23 injured with respect to inspections performed on three (3) undercover Bureau vehicles.
24 Complainant refers to, and by this reference incorporates, the allegations contained in paragraphs
25 23 through 31, inclusive, as though set forth fully herein.

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1 **ELEVENTH CAUSE FOR DISCIPLINE**

2 **(Failure to Comply with the Bus. & Prof. Code)**

3 42. Respondent Jong Won Pyun's brake and lamp adjuster licenses are subject to
4 disciplinary action pursuant to Bus. & Prof. Code section 9889.3, subdivisions (a) and (h), in that
5 he violated the provisions of Bus. & Prof. Code sections 9884.9, subdivision (a), 9889.16, and
6 9889.22 relating to his licensed activities. Complainant refers to, and by this reference
7 incorporates, the allegations contained in paragraphs 23 through 31, inclusive, as though set forth
8 fully herein.

9 **TWELFTH CAUSE FOR DISCIPLINE**

10 **(Violations of Regulations)**

11 43. Respondent Jong Won Pyun's brake and lamp adjuster licenses are subject to
12 disciplinary action pursuant to Bus. & Prof. Code section 9889.3, subdivision (c), in that he failed
13 to comply with the provisions of California Code of Regulations, title 16, sections 3305,
14 subdivision (a), 3316, subdivision (d)(2), and 3321, subdivision (c)(2). Complainant refers to, and
15 by this reference incorporates, the allegations contained in paragraphs 23 through 31, inclusive, as
16 though set forth fully herein.

17 **THIRTEENTH CAUSE FOR DISCIPLINE**

18 **(Issuance of False/Fraudulent Smog Certification)**

19 44. Respondent Jong Won Pyun's smog check inspector and smog check repair
20 technician licenses are subject to disciplinary action pursuant to California Code of Regulations,
21 title 16, section 3340.24, subdivision (c), in that Respondent falsely and/or fraudulently issued a
22 certificate of compliance to the Bureau's undercover 2000 Honda on April 7, 2015. Complainant
23 refers to, and by this reference incorporates, the allegations contained in paragraphs 23 through
24 25, inclusive, as though set forth fully herein.

25 **FOURTEENTH CAUSE FOR DISCIPLINE**

26 **(Failure to Perform Smog Inspection in accordance with State Law)**

27 45. Respondent Jong Won Pyun's smog check inspector and smog check repair
28 technician licenses are subject to disciplinary action pursuant to Health and Safety Code section

1 44072.2, subdivision (a), in conjunction with California Code of Regulations, title 16, section
2 3340.30, subdivision (a), in that Respondent failed to inspect the Bureau's undercover 2000
3 Honda on April 7, 2015, in accordance with state law. Complainant refers to, and by this reference
4 incorporates, the allegations contained in paragraphs 23 through 25, inclusive, as though set forth
5 fully herein.

6 **FIFTEENTH CAUSE FOR DISCIPLINE**

7 **(Dishonest Acts)**

8 46. Respondent Jong Won Pyun's smog check inspector and smog check repair
9 technician licenses are subject to disciplinary action pursuant to Health and Safety Code section
10 44072.2, subdivision (d), in that Respondent committed acts involving dishonesty, fraud, and/or
11 deceit whereby another was injured with respect to inspections performed on three (3) undercover
12 Bureau vehicles. Complainant refers to, and by this reference incorporates, the allegations
13 contained in paragraphs 23 through 31, inclusive, as though set forth fully herein.

14 **SIXTEENTH CAUSE FOR DISCIPLINE**

15 **(Aiding Unlicensed Activity)**

16 47. Respondent Jong Won Pyun's smog check inspector and smog check repair
17 technician licenses are subject to disciplinary action pursuant to Health and Safety Code section
18 44072.2, subdivision (f), in that Respondent aided and/or abetted an unlicensed person to evade
19 the provisions of the Motor Vehicle Inspection Program with respect to the smog inspection of
20 the Bureau's undercover 2000 Honda on April 7, 2015. Complainant refers to, and by this
21 reference incorporates, the allegations contained in paragraphs 23 through 25, inclusive, as
22 though set forth fully herein.

23 **OTHER MATTERS**

24 48. Pursuant to Bus. & Prof. Code section 9884.7, subdivision (c), the Director may
25 suspend, revoke or place on probation the registration for all places of business operated in this
26 state by Respondent Jong Won Pyun upon a finding that said Respondent has, or is, engaged in a
27 course of repeated and willful violations of the laws and regulations pertaining to an automotive
28 repair dealer.

1 49. Pursuant to Health & Saf. Code section 44072.8, if Smog Check Station License
2 Number RC 263894, issued to Jong Won Pyun, dba John's Auto 76, is revoked or suspended, any
3 additional license issued under Chapter 5 of the Health & Saf. Code in the name of said licensee
4 may be likewise revoked or suspended by the Director.

5 50. Pursuant to Bus. & Prof. Code section 9889.9, if Lamp Station License Number
6 LS 263894, issued to Jong Won Pyun, dba John's Auto 76, is revoked or suspended, any
7 additional license issued under Articles 5 and 6 of Chapter 20.3 of the Bus. & Prof. Code in the
8 name of said licensee may be likewise revoked or suspended by the Director.

9 51. Pursuant to Bus. & Prof. Code section 9889.9, if Brake Station License Number
10 BS 263894, issued to Jong Won Pyun, dba John's Auto 76, is revoked or suspended, any
11 additional license issued under Articles 5 and 6 of Chapter 20.3 of the Bus. & Prof. Code in the
12 name of said licensee may be likewise revoked or suspended by the Director.

13 52. Pursuant to Health & Saf. Code section 44072.8, if Smog Check Inspector License
14 Number EO 29379 and/or Check Repair Technician License Number EI 29379 issued to Jong
15 Won Pyun, are revoked or suspended, any additional license issued under Chapter 5 of the Health
16 & Saf. Code in the name of said licensee may be likewise revoked or suspended by the Director.

17 53. Pursuant to Bus. & Prof. Code section 9889.9, if Brake Adjuster License Number
18 BA 29379 issued to Jong Won Pyun, is revoked or suspended, any additional license issued under
19 Articles 5 and 6 of Chapter 20.3 of the Bus. & Prof. Code in the name of said licensee may be
20 likewise revoked or suspended by the Director.

21 54. Pursuant to Bus. & Prof. Code section 9889.9, if Lamp Adjuster License Number
22 LA 29379 issued to Jong Won Pyun, is revoked or suspended, any additional license issued under
23 Articles 5 and 6 of Chapter 20.3 of the Bus. & Prof. Code in the name of said licensee may be
24 likewise revoked or suspended by the Director.

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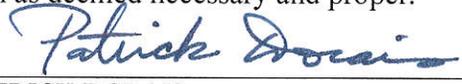
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PRAYER

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

1. Revoking or suspending Auto Repair Dealer Registration Number ARD 263894, issued to Jong Won Pyun, dba John's Auto 76;
2. Revoking or suspending Smog Check Station License Number RC 263894, issued to Jong Won Pyun, dba John's Auto 76;
3. Revoking or suspending Lamp Station License Number LS 263894, issued to Jong Won Pyun, dba John's Auto 76;
4. Revoking or suspending Brake Station License Number BS 263894, issued to Jong Won Pyun, dba John's Auto 76;
5. Revoking or suspending Smog Check Inspector License Number EO 29379, issued to Jong Won Pyun;
6. Revoking or suspending Smog Check Repair Technician License Number EI 29379, issued to Jong Won Pyun;
7. Revoking or suspending Brake Adjuster License Number BA 29379, class C, issued to Jong Won Pyun;
8. Revoking or suspending Lamp Adjuster License Number LA 29379, class A, issued to Jong Won Pyun;
9. Ordering Jong Won Pyun 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;
10. Taking such other and further action as deemed necessary and proper.

DATED: February 26, 2016



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