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

13 In the Matter of the Accusation Against:

Case No. 77/20-3281

14 **ECMB SERVICES, INC.,**  
15 **DBA 1ST STOP CAR CARE & SMOG**  
16 **MIGUEL BELTRAN, PRESIDENT/TREASURER**  
17 **EMMA IRENE CASTILLO LIMON, SECRETARY**  
**3008 N. 2nd Ave.**  
**Chula Vista, CA 91910**

**ACCUSATION**

18 **Automotive Repair Dealer Registration No. ARD**  
**283712**  
19 **Smog Check Station License No. RC 283712**  
20 **Brake Station License No. BS 283712, Class C**  
**Lamp Station License No. LS 283712, Class A**

21 Respondent.

22  
23 **PARTIES**

- 24 1. Patrick Dorais (Complainant) brings this Accusation solely in his official capacity as  
25 the Chief of the Bureau of Automotive Repair (Bureau), Department of Consumer Affairs.  
26 2. On or about May 24, 2016, the Bureau issued Automotive Repair Dealer Registration  
27 Number ARD 283712 to ECMB Services, Inc., dba 1st Stop Car Care & Smog; Miguel Beltran,  
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1 President/Treasurer; Emma Irene Castillo Limon, Secretary (Respondent). The Automotive  
2 Repair Dealer Registration was in full force and effect at all times relevant to the charges brought  
3 herein and will expire on May 31, 2022, unless renewed.

4 3. On or about May 17, 2021, the Bureau issued Smog Check Station License Number  
5 RC 283712 to Respondent. The Smog Check Station License will expire on May 31, 2022,  
6 unless renewed.

7 4. On or about May 17, 2021, the Bureau issued Lamp Station License Number LS  
8 283712, class A, to Respondent. The Lamp Station License will expire on May 31, 2022, unless  
9 renewed.

10 5. On or about May 17, 2021, the Bureau issued Brake Station License Number BS  
11 283712, class C, to Respondent. The Brake Station License will expire on May 31, 2022, unless  
12 renewed.

### 13 **JURISDICTION**

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

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

21 8. Health and Safety Code section 44002 provides, in pertinent part, that the Director  
22 has all the powers and authority granted under the Automotive Repair Act for enforcing the  
23 Motor Vehicle Inspection Program.

24 9. Health and Safety Code section 44072.6 provides, in pertinent part, that the expiration  
25 or suspension of a license by operation of law, or by order or decision of the Director of  
26 Consumer Affairs, or a court of law, or the voluntary surrender of the license shall not deprive the  
27 Director of jurisdiction to proceed with disciplinary action.

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**STATUTORY PROVISIONS**

10. 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.

(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 his or her signature, as soon as the customer signs the document.

(4) Any other conduct which constitutes fraud.

....

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

(7) Any willful departure from or disregard of accepted trade standards for good and workmanlike repair in any material respect, which is prejudicial to another without consent of the owner or his or her duly authorized representative.

....

11. Section 9884.9 of the Code 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, and shall do either of the following:

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1 (1) Make a notation on the invoice of the same facts set forth in the notation on  
2 the work order.

3 (2) Upon completion of the repairs, obtain the customer's signature or initials to  
4 an acknowledgment of notice and consent, if there is an oral consent of the customer  
5 to additional repairs, in the following language:

"I acknowledge notice and oral approval of an increase in the original estimated price.	
_____	
_____	(signature or initials)"

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10 Nothing in this section shall be construed as requiring an automotive repair  
11 dealer to give a written estimated price if the dealer does not agree to perform the  
12 requested repair.

12 12. Section 9884.13 of the Code states:

13 The expiration of a valid registration shall not deprive the director or chief of  
14 jurisdiction to proceed with any investigation or disciplinary proceeding against an  
15 automotive repair dealer or to render a decision invalidating a registration temporarily  
16 or permanently.

16 13. Section 9889.1 of the Code states:

17 Any license issued pursuant to Articles 5 and 6 [commencing with section  
18 9887.1 of the Automotive Repair Act], may be suspended or revoked by the director.  
19 The director may refuse to issue a license to any applicant for the reasons set forth in  
20 Section 9889.2. The proceedings under this article shall be conducted in accordance  
21 with Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of  
22 the Government Code, and the director shall have all the powers granted therein.

21 14. Section 9889.3 of the Code states:

22 The director may suspend, revoke, or take other disciplinary action against a  
23 license as provided in this article [Article 7 (commencing with section 9889.1) of  
24 Chapter 20.3 of Division 3 of the Business and Professions Code] if the licensee or  
25 any partner, officer, or director thereof:

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

26 ...

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

...

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

(i) Is convicted of a violation of Section 551 of the Penal Code.

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

16. 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 . . .

17. 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.

**REGULATORY PROVISIONS**

18. California Code of Regulations, title 16, section 3353, states:

No work for compensation shall be commenced and no charges shall accrue without specific authorization from the customer in accordance with the following requirements:

(a) Estimate for Parts and Labor. Every dealer shall give to each customer a written estimated price for labor and parts for a specific job.

(b) Estimate for Auto Body or Collision Repairs. Every dealer, when doing auto body or collision repairs, shall give to each customer a written estimated price for parts and labor for a specific job. Parts and labor shall be described separately and each part shall be identified, indicating whether the replacement part is new, used, rebuilt or reconditioned. The estimate shall also describe replacement crash parts as original equipment manufacturer (OEM) crash parts or non-OEM aftermarket crash parts.

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1 (c) Additional Authorization. The dealer shall obtain the customer's  
2 authorization before any additional work not estimated is done or parts not estimated  
3 are supplied. This authorization shall be in written, oral, or electronic form, and shall  
4 describe additional repairs, parts, labor and the total additional cost.

5 (1) If the authorization from the customer for additional repairs, parts, or labor  
6 in excess of the written estimated price is obtained orally, the dealer shall also make a  
7 notation on the work order and on the invoice of the date, time, name of the person  
8 authorizing the additional repairs, and the telephone number called, if any, together  
9 with the specification of the additional repairs, parts, labor and the total additional  
10 costs.

11 ...

12 (4) The additional repairs, parts, labor, total additional cost, and a statement  
13 that the additional repairs were authorized either orally, or by fax, or by e-mail shall  
14 be recorded on the final invoice to Section 9884.9 of the Business and Professions  
15 Code. All documentation must be retained pursuant to Section 9884.11 of the  
16 Business and Professions Code.

17 ....

18 19. California Code of Regulations, title 16, section 3356, subdivision (b), states:

19 If a customer is to be charged for a part, that part shall be specifically listed as  
20 an item in the invoice, as provided in subparagraph (B) of paragraph (2) of subsection  
21 (a) above. If that-item is not listed in the invoice, it shall not be regarded as a part,  
22 and a separate charge may not be made for it.

23 20. California Code of Regulations, title 16, section 3371 states:

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

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

30 No automotive repair dealer or individual in charge shall, in filling out an  
31 estimate, invoice, or work order, or record required to be maintained by section  
32 3340.15(e) of this chapter, withhold therefrom or insert therein any statement or  
33 information which will cause any such document to be false or misleading, or where  
34 the tendency or effect thereby would be to mislead or deceive customers, prospective  
35 customers, or the public.

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1 **COST RECOVERY**

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

8 **FACTUAL ALLEGATIONS**

9 **Undercover Operation #1 – 2001 GMC**

10 23. On February 26, 2020, an undercover operator with the Bureau (Operator 1) took the  
11 Bureau’s 2001 GMC to Respondent’s facility. Prior to the undercover run, a Bureau  
12 representative inspected and documented the vehicle’s brake system. Other than the vehicle’s  
13 low front brake pad linings, all existing brake system components were in good condition and did  
14 not need replacement.

15 24. Operator 1 arrived at Respondent’s facility at approximately 0959 hours and met with  
16 a male identified as “Mike.” Operator 1 requested a brake inspection for the 2001 GMC. At  
17 Mike’s request, Operator 1 accompanied Mike on a test drive of the vehicle. Mike estimated it  
18 would take approximately one-hour to inspect the vehicle and said that he did not think the  
19 vehicle needed brakes, but he would send pictures of any concerns after the inspection. Operator  
20 1 signed and was provided a copy of the estimate for a “no charge brake inspection” that included  
21 a \$3.00 Hazardous Materials fee. Operator 1 left the facility.

22 25. At approximately 1130 hours, Operator 1 called Respondent regarding the status of  
23 the 2001 GMC and was advised Respondent was very busy and it would take an additional two  
24 hours to complete the inspection.

25 26. At approximately 1445 hours, Operator 1 called Respondent again regarding the  
26 status of the 2001 GMC and was advised that the vehicle had just been pulled into the shop and  
27 inspection would be completed in fifteen to twenty minutes.

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1           27. At approximately 1600 hours, Operator 1 missed a call from Respondent. Operator 1  
2 returned the call and spoke with Mike, who told Operator 1 that the 2001 GMC had a brake fluid  
3 leak coming from the right rear brake line at the caliper. Mike said the brake lines needed to be  
4 replaced in pairs, and it would cost \$150.00 each. Mike said there was water in the brake fluid,  
5 which contaminated it and causes erosion in the brake system that damages the seals. Mike told  
6 Operator 1 he wanted to bleed the complete brake system after the brake hoses were replaced to  
7 remove all contaminated brake fluid. Mike also said the leaking brake hose would cause the  
8 brake pedal to go soft and the vehicle would eventually run out of fluid causing it to have no  
9 brakes. Mike said the front brake pads were low and he recommended replacing the front brake  
10 pads and resurfacing the front brake rotors. Mike told Operator 1 the job would cost \$557.83, and  
11 the repairs would be completed the following day. Operator 1 heard Mike ask someone in the  
12 background if they had sent Operator 1 the pictures yet and the person replied, “yes.” Operator 1  
13 authorized \$557.83 to replace two brake lines, bleed the complete brake system, and replace the  
14 front brake pads. Operator 1 later received a text message that could not be downloaded from an  
15 unidentified phone number.

16           28. On February 27, 2020, at approximately 0815 hours, Operator 1 called Respondent  
17 and spoke with an unidentified female regarding the 2001 GMC and when it would be complete.  
18 Operator 1 was told Mike would call her back in five minutes.

19           29. At approximately 1000 hours, Operator 1 called Respondent and spoke with a male  
20 who identified himself as “Olof.” Olof told Operator 1 the 2001 GMC should be completed  
21 around 1230 hours.

22           30. At approximately 1225 hours, Operator 1 received a call from Olof, who said the  
23 repairs were complete.

24           31. At approximately 1240 hours, Operator 1 returned to Respondent’s facility and met  
25 with a male identified as “George.” Operator 1 paid George \$557.83, tax included. George  
26 provided Operator 1 with a final invoice and the keys to the 2001 GMC. Mike was also there and  
27 asked Operator 1 if she received the pictures. Operator 1 told Mike that she had not, and he said  
28 he would try to send the pictures again. Operator 1 never received any pictures.





1 would bleed the complete brake system. Respondent charged Operator 1 for bleeding the  
2 complete brake system but did not actually complete the service.

3 b. Respondent's employee/representative Mike falsely stated the right rear hose in  
4 the 2001 GMC was leaking and required the replacement of both rear lines (hoses). Respondent  
5 listed and charged to replace two hoses on the final invoice but only replaced one brake hose.  
6 The brake hose that was replaced did not need to be.

7 c. Respondent falsely stated on its invoice for the 2008 Toyota "customer heard a  
8 squealing noise." Operator 2 never made that statement.

9 d. Respondent falsely entered the incorrect odometer reading on the estimate and  
10 the invoice for the 2001 GMC. The odometer reading was 161,705, but Respondent documented  
11 it as 161,200.

12 **SECOND CAUSE FOR DISCIPLINE**

13 **(Failure to Provide a Copy of the Work Order)**

14 41. Respondent is subject to disciplinary action under Code section 9884.7, subdivision  
15 (a)(3), in that Respondent failed provide Operator 2 with a copy of the signed estimate.  
16 Complainant incorporates by reference paragraphs 34 through 39, above, as if fully set forth  
17 herein.

18 **THIRD CAUSE FOR DISCIPLINE**

19 **(Fraud – ARD Registration)**

20 42. Respondent is subject to disciplinary action under Code section 9884.7, subdivision  
21 (a)(4), in that Respondent committed acts constituting fraud as set forth in paragraphs 23 through  
22 39, above, and as follows:

23 a. Respondent sold and charged to bleed the entire brake system on the 2001  
24 GMC, which was unnecessary and was not actually done.

25 b. Respondent sold and charged to replace two brake lines (hoses) on the 2001  
26 GMC that were not needed, and Respondent only actually installed one of the two.

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1 **FOURTH CAUSE FOR DISCIPLINE**

2 **(Willful Departure/Disregard of Accepted Trade Standards)**

3 43. Respondent is subject to disciplinary action under Code section 9884.7, subdivision  
4 (a)(7), for its willful departure from or disregard of accepted trade standards for good and  
5 workmanlike repair in any material respect when it improperly resurfaced both front brake discs  
6 on the 2008 Toyota resulting in runout measurements out of specification. Complainant  
7 incorporates by reference paragraphs 34 through 39, above, as if fully set forth herein.

8 **FIFTH CAUSE FOR DISCIPLINE**

9 **(Estimate and Authorization Requirements)**

10 44. Respondent is subject to disciplinary action under Code section 9884.9, subdivision  
11 (a), for failing to provide Operator 1 a written estimate of work to be performed, and for failing to  
12 document Operator 1’s telephone authorization for the additional work on the final invoice.  
13 Complainant incorporates by reference paragraphs 23 through 33, above, as if fully set forth  
14 herein.

15 **SIXTH CAUSE OF DISCIPLINE**

16 **(Estimate/Work Order Requirements – 16 CCR 3353)**

17 45. Respondent is subject to disciplinary action under Code section 9884.7, subdivision  
18 (a)(6), in conjunction with California Code of Regulations, Title 16, Section 3353, for failing to  
19 provide Operator 1 a written estimate of work to be performed and for failing to document  
20 Operator 1’s telephone authorization for the additional work on the final invoice. Complainant  
21 incorporates by reference paragraphs 23 through 33, above, as if fully set forth herein.

22 **SEVENTH CAUSE OF DISCIPLINE**

23 **(Failure to Show Business Name as Registered – 16 CCR 3356(b))**

24 46. Respondent is subject to disciplinary action under Code section 9884.7, subdivision  
25 (a)(6), in conjunction with California Code of Regulations, Title 16, Section 3356, subdivision  
26 (b), for failing to show its correct business name – as registered with the Bureau – on its invoices.  
27 The invoices provided to Operator 1 and Operator 2 showed Respondent’s name as “1st Stop Car  
28 Care,” but Respondent’s registered with the Bureau as “1st Stop Car Care & Smog.”

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**EIGHTH CAUSE OF DISCIPLINE**

**(Untrue or Misleading Statements/Records – 16 CCR 3371)**

47. Respondent is subject to disciplinary action under Code section 9884.7, subdivision (a)(6), in conjunction with California Code of Regulations, Title 16, Section 3371, in that Respondent made untrue or misleading statements that were known to be false or misleading, or which by the exercise of reasonable care should be known to be false or misleading, as set forth in the First Cause of Discipline, above. Complainant incorporates by reference paragraphs 23 through 40, above, as if fully set forth herein.

**NINTH CAUSE OF DISCIPLINE**

**(Untrue or Misleading Statements/Records – 16 CCR 3373)**

48. Respondent is subject to disciplinary action under Code section 9884.7, subdivision (a)(6), in conjunction with California Code of Regulations, Title 16, Section 3373, in that Respondent made untrue or misleading statements that were known to be false or misleading, or which by the exercise of reasonable care should be known to be false or misleading, as set forth in the First Cause of Discipline, above. Complainant incorporates by reference paragraphs 23 through 40, above, as if fully set forth herein.

**TENTH CAUSE FOR DISCIPLINE**

**(Fraud – Brake and Lamp Station Licenses)**

49. Respondent is subject to disciplinary action under Code section 9889.3, subdivision (d), in that Respondent committed acts involving dishonesty, fraud, or deceit whereby another was injured as set forth in paragraphs 19 through 35, above, and as follows:

- a. Respondent sold and charged to bleed the entire brake system on the 2001 GMC, which was unnecessary and was not actually done.
- b. Respondent sold and charged to replace two brake lines (hoses) on the 2001 GMC that were not needed, and Respondent only actually installed one of the two.

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1 **ELEVENTH CAUSE FOR DISCIPLINE**

2 **(Dishonesty, Fraud, or Deceit – Smog Check Station License)**

3 50. Respondent is subject to disciplinary action under Health and Safety Code section  
4 44072.2, subdivision (d), in that Respondent committed acts involving dishonesty, fraud, or deceit  
5 whereby another was injured as set forth in paragraphs 19 through 35, above, and as follows:

6 a. Respondent sold and charged to bleed the entire brake system on the 2001  
7 GMC, which was unnecessary and was not actually done.

8 b. Respondent sold and charged to replace two brake lines (hoses) on the 2001  
9 GMC that were not needed, and Respondent only actually installed one of the two.

10 **OTHER MATTERS**

11 51. Pursuant to Code section 9884.7, subdivision (c), the Director may suspend,  
12 revoke, or place on probation the registration for all places of business operated in this state by  
13 ECMB Services, Inc., upon a finding that said Respondent has, or is, engaged in a course of  
14 repeated and willful violations of the laws and regulations pertaining to an automotive repair  
15 dealer.

16 52. Pursuant to Code section 9889.9, if Respondent's Lamp Station License Number  
17 LS 283712 is revoked or suspended, the Director may likewise revoke or suspend any additional  
18 license issued under Articles 5 and 6 of Chapter 20.3 of the Code in the name of ECMB  
19 Services, Inc.

20 53. Pursuant to Code section 9889.9, if Respondent's Brake Station License Number  
21 BS 283712 is revoked or suspended, the Director may likewise revoke or suspend any additional  
22 license issued under Articles 5 and 6 of Chapter 20.3 of the Code in the name of ECMB  
23 Services, Inc.

24 54. Pursuant to Health and Safety Code section 44072.8, if Respondent's Smog  
25 Check Station License Number RC 283712 is revoked or suspended, the Director may likewise  
26 revoke or suspend any additional license issued under Chapter 5 of the Health and Safety Code  
27 in the name of ECMB Services, Inc.

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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 283712, issued to ECMB Services, Inc., dba 1st Stop Car Care & Smog;
2. Revoking or suspending any other Automotive Repair Dealer Registration issued to ECMB Services, Inc.;
3. Revoking or suspending Smog Check Station License Number RC 283712, issued to ECMB Services, Inc., dba 1st Stop Car Care & Smog;
4. Revoking or suspending any additional licenses issued under Chapter 5 of Part 5 of Division 26 of the Health and Safety Code in the name of ECMB Services, Inc.;
5. Revoking or suspending Lamp Station License Number LS 283712, issued to ECMB Services, Inc., dba 1st Stop Car Care & Smog;
6. Revoking or suspending Brake Station License Number BS 283712, issued to ECMB Services, Inc., dba 1st Stop Car Care & Smog;
7. Revoking or suspending any additional licenses issued under Article 5 and 6 of Chapter 20.3 of the Business and Professions Code in the name of ECMB Services, Inc.;
8. Ordering ECMB Services, Inc., dba 1st Stop Car Care & Smog; Miguel Beltran, President/Treasurer; Emma Irene Castillo Limon, Secretary 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,
9. 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*