

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

In the Matter of the Accusation Against:

JAVIER LUCIANO LOPEZ, dba INLAND EMPIRE SMOG AND REPAIR

17763 Valley Blvd. Unit G

Bloomington, CA 92316

Automotive Repair Dealer Registration No. ARD 289675

Smog Check, Test and Repair, Station License No. RC 289675

and

HUNG PHI QUACH

15446 Arlington Way

Fontana, CA 92336

Smog Check Inspector License No. EO 640877

Respondents.

Case No. 79/24-362

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OAH No. 2024100610

DECISION

The attached Proposed Decision of the Administrative Law Judge is hereby accepted and adopted by the Director of the Department of Consumer Affairs as the Decision in the above-entitled matter.

This Decision shall be effective on June 26, 2025.

IT IS SO ORDERED May 19, 2025.

Original signature on file
GRACE ARUPO RODRIGUEZ
Assistant Deputy Director
Legal Affairs Division
Department of Consumer Affairs

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

In the Matter of the Accusation Against:

JAVIER LUCIANO LOPEZ, doing business as

INLAND EMPIRE SMOG AND REPAIR

Automotive Repair Dealer Registration No. ARD 289675

Smog Check, Test-and-Repair, Station License No. RC 289675

and

HUNG PHI QUACH,

Smog Check Inspector License No. EO640877

Respondents.

Agency Case No. 79/24-362

OAH No. 2024100610

PROPOSED DECISION

Chris Ruiz, Administrative Law Judge, Office of Administrative Hearings (OAH), State of California, heard this matter on March 17, 2025, via videoconference.

Kevin J. Schettig, Deputy Attorney General, represented Patrick Dorais (complainant), Chief of the Bureau of Automotive Repair (Bureau), Department of Consumer Affairs (DCA).

Nicole Weil, Attorney, represented Javier Luciano Lopez (Lopez), who does business as Inland Empire Smog and Repair (Inland). Lopez was not present during the hearing.

Testimony and documents were received as evidence. The record closed and the matter was submitted for decision on March 17, 2025.

FACTUAL FINDINGS

Licenses Held by Respondents

LICENSES HELD BY LOPEZ AND INLAND

1. On February 23, 2018, the Bureau issued Automotive Repair Dealer (ARD) Registration Number ARD 289675 to Lopez, doing business as Inland. The Automotive Repair Dealer Registration was active relevant to the charges brought in the Accusation and is scheduled to expire on February 28, 2026, unless renewed.

2. On April 9, 2018, the Bureau issued Smog Check, Test-and-Repair, Station License Number RC 289675 (Smog Station License) to Inland. The Smog Station

License was active relevant to the charges brought in the Accusation and is scheduled to expire on February 28, 2026, unless renewed.

3. On August 8, 2018, the Bureau issued STAR Station Certification to Inland. The STAR Station Certification was suspended on April 11, 2023. The Accusation does not seek discipline against Inland's STAR Station Certification.

LICENSE HELD BY HUNG PHI QUACH

4. On January 24, 2018, the Bureau issued Smog Check Inspector License Number EO 640877 to Hung Phi Quach (Quach).

5. On October 29, 2024, the Bureau issued a "Default Decision and Order Only as to Hung Phi Quach" which revoked Smog Check Inspector License No. EO 640877. That Decision became effective on April 6, 2024 (Exhibit 27).

6. Quach performed the 10 smog check inspections at issue in this matter.

Jurisdiction

7. The term "respondents," as used in this Proposed Decision, references Lopez and Inland, collectively.

8. On August 14, 2024, complainant filed an Accusation, in his official capacity, against respondents and Quach.

9. On September 23, 2024, respondents filed a Notice of Defense, which requested an administrative hearing to challenge the allegations stated in the Accusation.

10. All jurisdictional requirements have been met.

The Bureau's Smog Check Program

TYPES OF SMOG CHECK TESTING

11. California's Smog Check Program requires the owners of most motor vehicles to have their vehicles inspected and tested at a licensed smog check station every two years. If a vehicle passes the inspection and test, a Certificate of Compliance is issued. The Smog Check Program is designed and intended to reduce air pollution by identifying and requiring the repair of polluting motor vehicles.

12. For older vehicles, a smog inspection generally required a probe being inserted into the tailpipe to test the emissions.

13. Beginning on March 9, 2015, California's Smog Check Program was updated to require the use of an On-Board Diagnostic Inspection System (OIS). OIS is the smog check equipment required when inspecting most model-year 2000 and newer gasoline and hybrid vehicles and most 1998 and newer diesel vehicles. The system consists of a certified Data Acquisition Device (DAD), a computer, a bar code scanner, and a printer. The DAD is an On-Board Diagnostic (OBD) scan tool that, when requested by the OIS software, retrieves OBD data from the vehicle. All OBD data that the vehicle indicates it supports is requested by the OIS software and will be retrieved. The DAD connects between the OIS computer and the vehicle's Data Link Connector (DLC). The OIS software requires a continuous internet connection when performing a smog check inspection and the OIS software communicates with the Bureau's central database via the internet. The bar code scanner is used to input the technician's information, the vehicle's identification number (VIN), and Department of Motor Vehicles (DMV) renewal information. After the smog check, a Vehicle Inspection Report

(VIR), which contains the inspection results, is printed for the customer, along with a Smog Check Certificate of Compliance number for passing vehicles.

14. The data retrieved and recorded during an OIS smog check includes: the eVIN, which is the digitally stored VIN programmed into the vehicle's Powertrain Control Module (PCM); the communication protocol, which is the vehicle's specific language the PCM uses to relay information; and the number of Parameter Identifications (PIDs), which is the number of specific data values each PCM uses related to emissions controls.

15. PIDs are data points reported by a vehicle's on-board computer to a scan tool or the OIS. Examples of PIDs are engine speed, vehicle speed, engine temperature, and other input and output values utilized by the vehicle's on-board computer. The PID count is the number of data points reported by the vehicle's on-board computer and is programmed during manufacture.

16. During an OIS inspection, engine operating parameters are retrieved from the vehicle's OBD system and recorded to the Vehicle Inspection Data (VID). This is accomplished during the functional portion of the OIS smog check inspection by plugging the DAD into the vehicle's DLC when prompted by the OIS analyzer screen prompt. Some of the PIDs recorded are: (1) engine speed in revolutions per minute (RPM); (2) throttle position as measured by a throttle position sensor (TPS) mounted onto the throttle shaft (measured from zero to 100 percent at full throttle); (3) manifold absolute pressure (MAP) as measured by a manifold absolute pressure sensor connected to an intake manifold source, measured in kilo pascals (kpa).

17. 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

zero percent. The MAP and Mass Air Flow (MAF) readings are also steady. For the engine speed to increase, the throttle would have to be opened. 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 an engine's RPM, would result in corresponding increases in MAF, as well as a change in MAP. Any movement of the throttle from the idle position will result in an increase the RPM and MAF and will create changes in MAP.

18. During an OIS Smog Check inspection, along with other visual and functional inspections, there is an OBD query portion of the inspection. The OBD query is performed with the engine idling and, when requested by the OIS analyzer, at an increased engine speed. The increase in engine speed is performed by the inspector by stepping on the throttle pedal, or manually opening the throttle, resulting in a corresponding increase in engine RPMs.

19. If the vehicle passes the visual, functional and related tests, it passes the overall inspection, and a Certificate of Compliance is issued and transmitted electronically to the VID. 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.

20. The VID contains registration data from DMV, plus emission standards, vehicle smog check inspections, smog check stations and technicians, and Certificates of Compliance. The VID receives the passing smog check results immediately following the inspection. During the vehicle registration process, the DMV accesses the VID to verify that the vehicle has been tested and certified. The Bureau can also access the VID to view test data on smog check inspections performed at any Smog Check Station, or search for, retrieve, and print a test record for a particular vehicle which has

been tested. The OIS also prints a VIR, which is a physical record of the test results and shows the Certificate of Compliance number that was issued if the vehicle passed the smog inspection.

21. The smog check technician must sign the VIR under penalty of perjury to indicate that the inspection was done within Bureau guidelines. Smog Check Stations are required by law to maintain a copy of the VIR along with a copy of the repair invoice for three years. Licensed Smog Check Technicians are the only persons authorized by the Bureau to perform official smog inspections. They are issued a personal access code and a license, which are used to gain access to the OIS to perform smog check inspections. Unauthorized use of another technician's access code or license is prohibited.

22. Some Smog Check stations, and Smog Check inspectors, use various methods to fraudulently issue smog certificates to vehicles that will not pass a Smog Check test on their own, or in some instances, are not even present when testing is performed.

23. One method is known as "clean piping," which is the act of using the emission sample of a known clean vehicle to substitute for the emissions of a vehicle that will not pass a smog inspection or is not present at the time of the test.

24. Another method is known as "clean plugging," which is a method by which another vehicle's properly functioning OBD system, or another source such as a defeat device, is used to generate passing data readings or diagnostic information for the purpose of fraudulently issuing smog certificates to vehicles that are not in smog compliance or are not present for testing.

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25. A defeat device attempts to simulate engine operation during a smog check inspection by transmitting OBD data to the VID, which has been modified or replaced entirely for the purportedly inspected vehicle during the functional portion of the OIS inspection. The use of a defeat device during a smog check inspection is illegal.

The Bureau's Investigation Regarding Respondents and Quach

26. Beginning in January 2024, a Bureau representative reviewed and investigated the smog check activities and OIS test data for the smog check inspections performed at Inland between January 2023 and February 2023. The investigation revealed that data related to certain vehicles certified by respondents contained a pattern of vehicles being certified with improbable engine operating parameters that did not correspond to normal engine operation. The investigator concluded the data collected by the DAD during the OBD functional test confirmed an OBD defeat device was used instead of the actual vehicle being tested, which constituted clean plugging.

27. The Accusation alleged that Quach and respondents used a defeat device while testing 10 specific vehicles. (Accusation, paragraphs 36-74.)

VEHICLE 1

28. On January 27, 2023, a 2000 Toyota Tacoma Xtracab Prerunner, license number 6G37441, vehicle identification number (VIN) 4TASN92N7YZ618930 (2000 Tacoma or Vehicle 1)), was tested and smog certificate IR784568C was issued by respondents, under the license of Quach.

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29. The Dynamic PID Chart for the 2000 Tacoma shows, between time stamp 346 and 22715, the vehicle's engine speed was steady at approximately 750 RPM. While the vehicle was at idle speed, the throttle was fixed at 12.5 percent open, the MAF was fixed at 5.96, and the ignition timing advance for cylinder number one was fixed at 12 degrees before top dead center (BTDC).

30. After time stamp 22715, the vehicle's engine speed accelerated to approximately 1825 RPM. However, the throttle remained fixed at 12.5 percent open, the MAF remained fixed at 5.96, and the ignition timing advance for cylinder number one remained fixed at 12 degrees BTDC.

31. During the entire period the dynamic data was collected, the only parameter that changed was engine RPM. The throttle position, MAF, and ignition timing advance readings remained unchanged even though the engine speed was increased. These readings are not characteristic of, or expected for, normal engine operation. For example, for an engine's speed to show an increased RPM, the throttle must be opened. There is no other way to increase a vehicle's speed and RPM.

32. The discrepancies in the OIS Test Data established that it is more likely than not the DAD was not connected to the 2000 Tacoma being certified, that Quach used of a defeat device, that Quach did not perform a proper smog inspection on Vehicle 1, and that Quach and respondents issued a fraudulent Smog Check Certificate of Compliance for Vehicle 1.

Vehicles 2 through 10

33. Respondents did not dispute that Quach performed the smog inspection on each of the 10 vehicles at issue. Respondents did not dispute that a Smog Check Certificate of Compliance was issued for each of those 10 vehicles.

34. The remaining nine vehicles at issue were also tested by Quach, while he worked at Inland, and each of the nine remaining vehicles were issued smog certificates. It is unnecessary to detail the specific test results for each vehicle at issue. The testing results for these nine vehicles were similar to Vehicle 1. That is, for these remaining nine vehicles at issue, as the engine RPM's speed increased during the smog test, the other PID data did not change, which is not expected for normal engine operation.

35. The discrepancies in the PID test data established that it is more likely than not the DAD was not connected to any of the nine vehicles being certified, that Quach used of a defeat device on each vehicle, that Quach did not perform a proper smog inspection on Vehicle 2 through Vehicle 10, and that Quach and respondents issued a fraudulent Smog Check Certificate of Compliance for each of those nine vehicles.

36. The allegations regarding Vehicle 2 through Vehicle 10 are set forth in paragraphs 40 through 74 of the Accusation. Those paragraphs are incorporated by reference as if fully set forth in this Propose Decision. The evidence presented established all these allegations.

37. It was established that when Quach tested the 10 vehicles at issue, it is more likely than not that Quach used an electronic defeat device, or software capable of simulating the OBD data stream from a vehicle or of manipulating OBD information.

38. It was established that Quach did not perform a proper smog inspection on any of the 10 vehicles at issue, and that Quach and respondents fraudulently issued a smog certificate of compliance for each of those vehicles.

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Respondents' Testimony and Evidence

39. Lopez and Quach did not testify at hearing.

40. Victor Quintero (Quintero) testified at hearing. Quintero has been employed at Inland as a licensed smog technician for approximately six years. Complainant did not allege any wrongdoing by Quintero. Quintero and another licensed smog technician named "Jose" are currently working at Inland.

41. Quintero worked alongside Quach at Inland beginning in 2020. Quintero testified that Quach suffered a stroke in October 2023, was taken to the hospital by paramedics, and never returned to work at Inland. Quintero did not observe Quach while Quach performed smog inspections.

42. Quintero testified that Lopez was recently incarcerated for reasons that were not established. Lopez was incarcerated as of the date of the hearing. Prior to his incarceration, Lopez was at Inland almost every day. Quintero is currently dealing with Bonnie Vallec (Vallec), who is Lopez's wife. Quintero testified that Lopez and Vallec do not possess knowledge regarding how a smog inspection is properly performed. Currently, Quintero is the only person on-site at Inland.

43. Respondents contended there was no evidence offered that any clean plugging has occurred at Inland since Quach left Inland in 2023. Further, respondents contended that the revocation of respondents' ARD registration or Smog Station License would unfairly result in Quintero losing his employment at Inland. While this contention is accurate, the evidence established that Lopez was at Inland when Quach performed the 10 smog inspections at issue. Further, Lopez failed to properly supervise Quach and failed to discover, or prevent, Quach from issuing fraudulent smog certificates of compliance to the 10 vehicles at issue.

44. While Quintero appears to be a capable and honest smog check technician, Quintero is not the holder of the Smog Station License. Lopez is currently unavailable to supervise Quintero and the evidence did not establish when Lopez will be released from his incarceration. Further, no evidence was presented regarding what measures Lopez would take to prevent a smog technician from performing illegal conduct in the future.

Costs of Enforcement and Investigation

45. The reasonable costs of investigation and enforcement in this matter are \$4,2323.80 and \$10,390.75, respectively. The total reasonable costs are \$14,614.55.

LEGAL CONCLUSIONS

General Statutory Authority

1. This Accusation in this matter was brought before the Director of the Department of Consumer Affairs (Director), on behalf of the Bureau.
2. Business and Professions Code (Code) section 9884.7 authorizes the Director to revoke an ARD registration.
3. Code section 9884.22, subdivision (a), authorizes the Director to revoke or suspend any license based on any ground for discipline set forth in Code sections 9884 through 9884.22.
4. Health and Safety Code section 44002 provides, in pertinent part, that the Director holds all power and authority granted under the Automotive Repair Act

(Code § 9880 - § 9889.53) for enforcing the Motor Vehicle Inspection Program (Health & Saf. Code § 44000 - § 44127).

5. Health and Safety Code section 44012 provides detailed specifications and requirements which must be met by smog check stations and technicians.

6. Health and Safety Code section 44072.2 provides authority for the Director to suspend, revoke, or take other disciplinary action against a license if the licensee violates any of the regulations adopted by the Director (subdivision (c)) or commits any act involving dishonesty, fraud, or deceit whereby another is injured (subdivision (d)).

7. Health and Safety Code section 44072.10, subdivision (c), states the Director "shall revoke the license of any smog check technician or station licensee who fraudulently certifies vehicles or participates in the fraudulent inspection of vehicles." The statute further defines clean-piping or tampering with a test analyzer system as fraudulent.

8. California Code of Regulations (CCR), title 16, section 3340.24, subdivision (c), authorizes the Bureau to suspend or revoke the license of a licensee, if the licensee falsely or fraudulently issues a certificate of compliance. All further regulatory references are to title 16 of the CCR.

9. CCR section 3340.41, subdivision (c), provides "no person shall enter any vehicle identification information or emission control system identification data for any vehicle other than the one being tested."

10. CCR section 3340.42, sets forth specific emissions test methods and procedures that must be complied with during a smog check inspection.

Burden of Proof

11. The Bureau had the burden of proof in this matter. The Bureau was required to prove each allegation by a preponderance of the evidence because respondent holds an occupational license, as compared to a professional license. (*Imports Performance v. Department of Consumer Affairs, Bureau of Automotive Repair* (2011) 201 Cal.App.4th 911, 916.) The preponderance of evidence standard has generally been defined as requiring proof of 51 percent, or “tipping the scales,” or making the existence of a fact more likely than not.

First Cause for Discipline (Untrue or Misleading Statements – Inland)

12. Cause exists to suspend or revoke Inland’s ARD Registration pursuant to Code section 9884.7, subdivision (a)(1), because respondents made or authorized statements which they knew, or in the exercise of reasonable care should have known, were untrue or misleading. Respondents certified that Vehicles 1 through 10 had passed a smog inspection and that respondents and Quach had performed the smog inspections in compliance with applicable laws and regulations. However, in fact, respondents permitted Quach to use the clean-plugging method to obtain fraudulent certificates of compliance for the 10 vehicles at issue.

Second Cause for Discipline (Fraud – Inland)

13. Cause exists to suspend or revoke Inland’s ARD registration under Code section 9884.7, subdivision (a)(4), because respondents committed acts which constitute fraud by issuing electronic smog certificates of compliance for the 10 vehicles at issue. Respondents failed to ensure Quach performed bona fide inspections of the emissions control devices and systems on those 10 vehicles, thereby depriving

the citizens of the State of California of the protection afforded by the Motor Vehicle Inspection Program.

Third Cause for Discipline (Material Violation of Automotive Repair Act – Inland)

14. Cause exists to suspend or revoke Inland's ARD registration under Code section 9884.7, subdivision (a)(6), because respondents failed in a material respect to comply with the statutes or regulations regarding smog inspections and allowed Quach to issue electronic smog certificates of compliance for the 10 vehicles at issue without performing bona fide inspections of the emissions control devices and systems on those vehicles. Respondents' conduct deprived the citizens of the State of California the protection afforded by the Motor Vehicle Inspection Program.

Fourth Cause for Discipline (Violations of the Motor Vehicle Inspection Program – Inland)

15. Cause exists to suspend or revoke Inland's Smog Station License pursuant to Health and Safety Code section 44072.2, subdivision (a), because Inland failed to ensure Quach complied with Health and Safety Code sections 44012, 44015, subdivision (b), and 44059, during his smog inspections of the 10 vehicles at issue, as follows:

a. Section 44012: Respondents failed to ensure that the emission control tests were performed on the 10 vehicles at issue in accordance with procedures prescribed by the Bureau.

b. Section 44015, subdivision (b): Respondents issued electronic smog certificates of compliance for the vehicles without ensuring that the vehicles were

properly tested and inspected to determine if they were compliant with Health and Safety Code section 44012.

c. Section 44059: Respondents willfully allowed Quach to make false entries for the electronic smog certificates of compliance for the vehicles by certifying that the vehicles had been inspected as required when, in fact, they had not.

Fifth Cause for Discipline (Failure to Comply with Regulations Pursuant to the Motor Vehicle Inspection Program – Inland)

16. Cause exists to suspend or revoke Inland's Smog Station License under Health and Safety Code section 44072.2, subdivision (c), because respondents failed to comply with CCR sections 3340.24, subdivision (c), 3340.35, subdivision (c), 3340.41, subdivision (c), 3340.42, and 3373, during the smog inspections of the 10 vehicles at issue, as follows:

a. Section 3340.24, subdivision (c): Respondents issued false or fraudulent certificates of compliance for the 10 vehicles.

b. Section 3340.35, subdivision (c): Respondents issued electronic smog certificates of compliance for the 10 vehicles even though the vehicles had not been inspected in accordance with CCR section 3340.42.

c. Section 3340.41, subdivision (c): Respondents knowingly allowed Quach to enter false information into the emissions inspection system for the vehicles.

d. Section 3340.42: Respondents failed to ensure that the required smog tests were conducted on the 10 vehicles in accordance with the Bureau's specifications.

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e. Section 3373: Respondents inserted statements or information in smog inspection records for the 10 vehicles at issue, required to be maintained by CCR section 3340.15, subdivision (e), which caused the document to be false or misleading.

Sixth Cause for Discipline (Dishonesty, Fraud, or Deceit – Inland)

17. Cause exists to suspend or revoke Inland's Smog Station License pursuant to Health and Safety Code section 44072.2, subdivision (d), in conjunction with Health and Safety Code section 44072.10, subdivision (c), because respondents committed dishonest, fraudulent, or deceitful acts whereby another was injured, by issuing electronic smog certificates of compliance for the 10 vehicles at issue without ensuring Quach performed bona fide inspections of the emission control devices and systems. The failure to perform a bona fide smog inspection injures the public at large by allowing a vehicle to pollute the air of California.

Seventh Cause for Discipline (Unlawful Software or Simulation Device - Inland)

18. Cause exists to suspend or revoke Inland's Smog Station License under Health and Safety Code section 44072.2, subdivision (c), in conjunction with CCR section 3340.41, subdivision (h), because respondents allowed Quach to use an electric device, or software, capable of simulating the OBD data stream from a vehicle, which manipulated the OBD information for the 10 vehicles at issue.

Other Matters

19. Pursuant to Code section 9884.7, subdivision (c), the Director may suspend, revoke, or place on probation the ARD registration for all places of business

operated in this state by Lopez or Inland because Quach was permitted to commit repeated and willful violations of the laws and regulations pertaining to an ARD.

20. Pursuant to Health and Safety Code section 44072.8, if the Smog Station License, issued to respondents, is revoked or suspended, any additional license issued under Chapter 5 of Part 5 of Division 26 of the Health and Safety Code in Lopez's or Inland's name, may be likewise revoked or suspended by the Director.

The Costs of Enforcement and Investigation

21. Code section 125.3 provides, in pertinent part, that the Bureau may request the administrative law judge to direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

22. In this case, the total reasonable costs of enforcement and investigation is \$14,614.55. However, since all of Lopez's licenses and registrations are being revoked, requiring Lopez to pay these costs would be punitive. Therefore, Lopez will only be required to pay half of these costs if Lopez applies to reinstate any of the licenses at issue in this matter or if Lopez applies for a new license in the future.

ORDER

1. Automotive Repair Dealer Registration Number ARD 289675, issued to Javier Luciano Lopez, doing business as Inland Empire Smog and Repair, is revoked.

2. Smog Check, Test Only, Station License Number RC 289675, issued to Javier Luciano Lopez, doing business as Inland Empire Smog and Repair, is revoked.

3. Any additional license issued under Chapter 5 of Part 5 of Division 26 of the Health and Safety Code, in the name of Javier Luciano Lopez or Inland Empire Smog and Repair, is hereby revoked.

4. Any other automotive repair dealer registration issued to Javier Luciano Lopez or Inland Empire Smog and Repair, is revoked.

5. Javier Luciano Lopez is ordered to pay the Bureau of Automotive Repair half of the reasonable costs of the investigation and enforcement of this case, which is \$7,307.28, pursuant to Business and Professions Code section 125.3. However, Javier Luciano Lopez will only be required to pay these costs if he applies to the Bureau of Automotive Repair for reinstatement of any license or registration, or if he files any future application for licensure with the Bureau.

04/16/2025

A handwritten signature in black ink, appearing to read "C. Ruiz", is positioned above a solid blue horizontal line.

Christopher Ruiz (April 16, 2025 PDT)

CHRIS RUIZ

Administrative Law Judge

Office of Administrative Hearings