

1 KAMALA D. HARRIS  
Attorney General of California  
2 DIANN SOKOLOFF  
Supervising Deputy Attorney General  
3 KIM M. SETTLES  
Deputy Attorney General  
4 State Bar No. 116945  
1515 Clay Street, 20th Floor  
5 P.O. Box 70550  
Oakland, CA 94612-0550  
6 Telephone: (510) 622-2138  
Facsimile: (510) 622-2270  
7 E-mail: kim.settles@doj.ca.gov  
*Attorneys for Complainant*

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

11  
12 In the Matter of the Accusation Against:  
13 **ROMEIL GROUP LLC, Owner; Sameer**  
**Balkrishna Tivare and Priya Tivare,**  
14 **Members, dba A STREET SMOG CHECK**  
**HAYWARD**  
15 **335 West A Street**  
**Hayward, California 94541**  
16  
17 **6167 Jarvis Avenue, #204**  
**Newark, CA 94560**  
18 **Automotive Repair Dealer Registration No.**  
**279148**  
19  
20 **Smog Check, Test Only, Station License No.**  
**TC 279148**  
21  
22 Respondent.

Case No. 79/16-145

**A C C U S A T I O N**

23 Complainant alleges:

24 **PARTIES**

- 25 1. Patrick Dorais (Complainant) brings this Accusation solely in his official capacity as  
26 the Chief of the Bureau of Automotive Repair, Department of Consumer Affairs.
- 27 2. On or about February 2, 2015, the Bureau of Automotive Repair issued Automotive  
28 Repair Dealer Registration Number ARD 279148 to Romeil Group, LLC, Sameer Balkrishna

1 Tivare, Member; Priya Sameer Tivare, Member, dba A Street Smog Check Hayward  
2 (“Respondent”) The Automotive Repair Dealer Registration was in full force and effect at all  
3 time relevant to the charges brought in this Accusation and will expire on February 28, 2017,  
4 unless renewed.

5 3. On or about May 14, 2015, the Bureau of Automotive Repair issued Smog Check,  
6 Test Only Station License Number TC 279148 to Romeil Group, LLC, Sameer Balkrishna  
7 Tivare, Member; Priya Sameer Tivare, Member, dba A Street Smog Check Hayward  
8 (“Respondent”) The Smog Check, Test Only License was in full force and effect at all time  
9 relevant to the charges brought in this Accusation and will expire on February 28, 2017, unless  
10 renewed.

#### 11 JURISDICTION

12 4. This Accusation is brought before the Director of the Department of Consumer  
13 Affairs (Director) for the Bureau of Automotive Repair, under the authority of the following laws.

14 5. Business and Professions Code (“Code”) section 118, subdivision (b), provides that  
15 the expiration of a license shall not deprive the Director of jurisdiction to proceed with a  
16 disciplinary action during the period within which the license may be renewed, restored, reissued  
17 or reinstated.

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

22 7. Code section 9889.1 provides, in pertinent part, that the Director may suspend or  
23 revoke any license issued under Articles 5 and 6 (commencing with section 9887.1) of the  
24 Automotive Repair Act.

25 8. Code section 9889.7 provides, in pertinent part, that the expiration or suspension of a  
26 license by operation of law by order or decision of the Director or a court of law, or the voluntary  
27 surrender of a license shall not deprive the director of jurisdiction to proceed with any  
28 disciplinary proceedings.



1 and Saf. Code, § 44000, et seq.)] and the regulations adopted pursuant to it, which related to the  
2 licensed activities.

3 . . . .

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

5 13. Section 44032 of the Health and Safety Code states:

6 "No person shall perform, for compensation, tests or repairs of emission control devices or  
7 systems of motor vehicles required by this chapter unless the person performing the test or repair  
8 is a qualified smog check technician and the test or repair is performed at a licensed smog check  
9 station. Qualified technicians shall perform tests of emission control devices and systems in  
10 accordance with Section 44012."

11 14. Section 44012 of the Health and Safety Code states, in pertinent part:

12 "The test at the smog check stations shall be performed in accordance with procedures  
13 prescribed by the department, pursuant to Section 44013, shall require, at a minimum, loaded  
14 mode dynamometer testing in enhanced areas, and two-speed testing in all other program areas,  
15 and shall ensure all of the following:

16 . . . .

17 "(f) A visual or functional check is made of emission control devices specified by the  
18 department, including the catalytic converter in those instances in which the department  
19 determines it to be necessary to meet the findings of Section 44001. The visual or functional  
20 check shall be performed in accordance with procedures prescribed by the department."

21 15. California Code of Regulations, title 16, section 3340.42, states, in pertinent part:

22 "Smog check inspection methods are prescribed in the Smog Check Manual, referenced by  
23 section 3340.45.

24 "(a) All vehicles subject to a smog check inspection, shall receive one of the following test  
25 methods:

26 . . .

27 "(3) An OBD-focused test, shall be the test method used to inspect gasoline-powered  
28 vehicles 2000 model-year and newer, and diesel-powered vehicles 1998 model-year and newer.

1 The OBD test failure criteria are specified in section 3340.42.2.

2 “(b) In addition to subsection (a), all vehicles subject to the smog check program shall  
3 receive the following:

4 “(1) A visual inspection of emission control components and systems to verify the vehicle's  
5 emission control systems are properly installed.

6 “(2) A functional inspection of emission control systems as specified in the Smog Check  
7 Manual, referenced by section 3340.45, which may include an OBD test, to verify their proper  
8 operation.”

9 16. California Code of Regulations, title 16, section 3340.30, states, in pertinent part:

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

12 “(a) A licensed technician shall inspect, test and repair vehicles in accordance with section  
13 44012 of the Health and Safety Code, section 44035 of the Health and Safety Code, and section  
14 3340.42 of this article.”

#### 15 COST RECOVERY

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

#### 22 FACTUAL ALLEGATIONS

23 18. On October 19, 2015, Bureau representative Christopher Cummings reviewed the  
24 OIS smog data for vehicles inspected by Mark Thomas Espinoza and certified by A Street Smog  
25 Check Hayward, for the period between June 3, 2015 and February 9, 2016. During Cummings'  
26 investigation, he accessed the VID, and performed a focused review of BAR-OIS test data for A  
27 Street Smog Check Hayward. BAR-OIS test data is the OBD (“On Board Diagnostics System”)  
28 information transmitted during a smog inspection from the computer of the vehicle being

1 inspected to the BAR-OIS. Beginning March 9, 2015, California's Smog Check Program was  
2 updated and now requires smog inspectors and stations to use the BAR-OIS computer system  
3 during smog inspections, for most model year 2000 and newer gasoline and hybrid vehicles, and  
4 most 1998 and new diesel vehicles. The BAR-OIS consists of a BAR-certified Data Acquisition  
5 Device ("DAD"), computer, bar code scanner, and printer. The DAD serves as an on-board  
6 diagnostic ("OBD") scan tool. The DAD is an interface box that connects the computer  
7 containing the BAR-OIS software to the diagnostic link connector ("DLC") of the vehicle being  
8 inspected. When requested by the BAR-OIS software, the DAD retrieves data from the vehicle's  
9 on-board computer system ("OBD II").

10 19. The information obtained by the BAR-OIS software during a smog inspection is  
11 organized in a detailed inspection report for each vehicle inspected and is known as a BAR-OIS  
12 Test Detail. The BAR-OIS Test Detail contains information segregated into eight different  
13 blocks titled as follows: Station, Vehicle, Test Status, Visual Details, Functional Details, OBDII  
14 Details, OBDII Readiness Monitor Status, and OBDII DTC Details. For the purposes of  
15 Cummings' investigation of Respondent, he focused on information in the "Vehicle" and "OBDII  
16 Details" blocks because they contain a unique combination of information for the vehicle being  
17 inspected and "like vehicles" inspected. Like vehicles are vehicles of the same manufacturer,  
18 model, and model year that were inspected on the BAR-OIS. The unique combination of  
19 information analyzed by Rodriguez includes the eVIN ("Electronic Vehicle Identification  
20 Number"), PID ("Parameter Identification") count, and communication protocol. Rodriguez  
21 compared the eVIN, communication protocol, and PID count for a vehicle that was certified to  
22 like vehicles.

23 20. Cummings identified eleven vehicles certified by Respondents A Street Smog Check  
24 Hayward and Mark Thomas Espinoza's inspection either differed from the OIS data the vehicles  
25 transmitted during other inspections, or the data was inconsistent with the OIS data transmitted by  
26 "like vehicles" inspected or both.

27 21. Cummings' review of the BAR-OIS data for the vehicles certified by Respondents A  
28 Street Smog Check Hayward and Mark Thomas Espinoza during the above-referenced time

1 period revealed a pattern of fraudulent smog inspections that resulted in the issuance of fraudulent  
2 certificates of compliance. There were eleven instances in which Respondent Mark Thomas  
3 Espinoza certified vehicles that were not connected to the DAD when they were certified.  
4 Respondent Mark Thomas Espinoza therefore clean plugged eleven vehicles, resulting in  
5 Respondent A Street Smog Check Hayward issuing eleven fraudulent Certificate of Compliance  
6 between June 3, 2015 and February 9, 2015. The details of each instance of clean plugging is as  
7 follows:

8 **22. Clean Plug Number 1:**

9 a. Cummings review of the OIS Test Data contained in the BAR's VID indicates that on  
10 June 3, 2015, Respondent Mark Thomas Espinoza inspected a 2008 Dodge Sprinter 3500 and A  
11 Street Smog Check Hayward issued smog Certificate of Compliance #YR526540C. The OIS  
12 Test Details for the 2008 Dodge Sprinter 3500 shows no eVIN reported, the communication  
13 protocol is listed as I9140808, and the PID count was 17. Comparative OIS Test data shows that  
14 similar 2008 Dodge Sprinter 3500 vehicles report the correct eVIN, have an expected  
15 communication protocol of ICAN11bt5, and an expected PID count of 32.

16 b. The discrepancies in the OIS Test Data establishes the OIS DAD was not connected  
17 to the 2008 Dodge Sprinter 3500 being certified, resulting in the issuance of a fraudulent smog  
18 Certificate of Compliance.

19 **23. Clean Plug Number 2:**

20 a. Cummings review of the OIS Test Data contained in the BAR's VID indicates that on  
21 September 8, 2015, Respondent Mark Thomas Espinoza inspected a 2003 Chrysler Sebring  
22 Limited and A Street Smog Check Hayward issued smog Certificate of Compliance  
23 #PW124691C. The OIS Test Details for the 2003 Chrysler Sebring Limited shows no eVIN  
24 reported, the communication protocol is listed as I9140808, and the PID count was 17.  
25 Comparative OIS Test data shows that similar 2003 Chrysler Sebring Limited vehicles report no  
26 eVIN, have an expected communication protocol of JVPW, and an expected PID count of 22/3.

1           b.    The discrepancies in the OIS Test Data establishes the OIS DAD was not connected  
2 to the 2008 Dodge Sprinter 3500 being certified, resulting in the issuance of a fraudulent smog  
3 Certificate of Compliance.

4           **24. Clean Plug Number 3:**

5           a.    Cummings review of the OIS Test Data contained in the BAR's VID indicates that on  
6 September 15, 2015, Respondent Mark Thomas Espinoza inspected a 2000 Ford Mustang and A  
7 Street Smog Check Hayward issued smog Certificate of Compliance #PW333985C. The OIS  
8 Test Details for the 2000 Ford Mustang shows no eVIN reported, the communication protocol is  
9 listed as I9140808, and the PID count was 17. Comparative OIS Test data shows that similar  
10 2000 Ford Mustang vehicles report no eVIN, have an expected communication protocol of  
11 JPWM, and an expected PID count of 20 or 21.

12           b.    The discrepancies in the OIS Test Data establishes the OIS DAD was not connected  
13 to the 2000 Ford Mustang being certified, resulting in the issuance of a fraudulent smog  
14 Certificate of Compliance.

15           **25. Clean Plug Number 4:**

16           a.    Cummings review of the OIS Test Data contained in the BAR's VID indicates that on  
17 September 29, 2015, Respondent Mark Thomas Espinoza inspected a 2004 Cadillac Deville and  
18 A Street Smog Check Hayward issued smog Certificate of Compliance #PW897153C. The OIS  
19 Test Details for the 2004 Cadillac Deville shows no eVIN reported, the communication protocol  
20 is listed as I9140808, and the PID count was 17. Comparative OIS Test data shows that similar  
21 2004 Cadillac Deville vehicles report the correct eVIN, have an expected communication  
22 protocol of JVPW and an expected PID count of 23.

23           b.    The discrepancies in the OIS Test Data establishes the OIS DAD was not connected  
24 to the 2004 Cadillac Deville being certified, resulting in the issuance of a fraudulent smog  
25 Certificate of Compliance.

26           **26. Clean Plug Number 5:**

27           a.    Cummings review of the OIS Test Data contained in the BAR's VID indicates that on  
28 October 6, 2015, Respondent Mark Thomas Espinoza inspected a 2000 Chevrolet Silverado

1 C1500 and A Street Smog Check Hayward issued smog Certificate of Compliance #PY095319C.  
2 The OIS Test Details for the 2000 Chevrolet Silverado C1500 shows no eVIN reported, the  
3 communication protocol is listed as I9140808, and the PID count was 18. Comparative OIS Test  
4 data shows that similar 2000 Chevrolet Silverado C1500 vehicles report the correct eVIN, have  
5 an expected communication protocol of JVPW and an expected PID count of 22 or 23.

6 b. The discrepancies in the OIS Test Data establishes the OIS DAD was not connected  
7 to the 2000 Chevrolet Silverado C1500 being certified, resulting in the issuance of a fraudulent  
8 smog Certificate of Compliance.

9 **27. Clean Plug Number 6:**

10 a. Cummings review of the OIS Test Data contained in the BAR's VID indicates that on  
11 October 6, 2015, Respondent Mark Thomas Espinoza inspected a 2004 Nissan Sentra 1.8/1.8S  
12 and A Street Smog Check Hayward issued smog Certificate of Compliance #PY095324C. The  
13 OIS Test Details for the 2004 Nissan Sentra 1.8/1.8S shows the eVIN as KNDJJ741X95029809,  
14 the communication protocol is listed as ICAN11bt500, and the PID count was 42. Comparative  
15 OIS Test data shows that similar 2004 Nissan Sentra 1.8/1.8S vehicles do not report an eVIN,  
16 have an expected communication protocol of I914 and an expected PID count of 18.

17 b. The discrepancies in the OIS Test Data establishes the OIS DAD was not connected  
18 to the 2004 Nissan Sentra 1.8/1.8S being certified, resulting in the issuance of a fraudulent smog  
19 Certificate of Compliance.

20 **28. Clean Plug Number 7:**

21 a. Cummings review of the OIS Test Data contained in the BAR's VID indicates that on  
22 October 20, 2015, Respondent Mark Thomas Espinoza inspected a 2006 Mercedes-Benz C230  
23 and A Street Smog Check Hayward issued smog Certificate of Compliance #PY415538C. The  
24 OIS Test Details for the 2006 Mercedes-Benz C230 shows no eVIN, the communication protocol  
25 is listed as I9140808, and the PID count was 17. Comparative OIS Test data shows that similar  
26 2006 Mercedes-Benz C230 vehicles report the correct eVIN, report an expected communication  
27 protocol of ICAN11bt5 and an expected PID count of 44.

28

1           b.    The discrepancies in the OIS Test Data establishes the OIS DAD was not connected  
2 to the 2006 Mercedes-Benz C230 being certified, resulting in the issuance of a fraudulent smog  
3 Certificate of Compliance.

4           **29. Clean Plug Number 8:**

5           a.    Cummings review of the OIS Test Data contained in the BAR's VID indicates that on  
6 November 3, 2015, Respondent Mark Thomas Espinoza inspected a 2006 Mercedes-Benz ML350  
7 and A Street Smog Check Hayward issued smog Certificate of Compliance #PY837328C. The  
8 OIS Test Details for the 2006 Mercedes-Benz ML350 shows no eVIN, the communication  
9 protocol is listed as I9140808, and the PID count was 17. Comparative OIS Test data shows that  
10 similar 2006 Mercedes-Benz ML350 vehicles report the correct eVIN, report an expected  
11 communication protocol of ICAN11bt5 and an expected PID count of 44.

12           b.    The discrepancies in the OIS Test Data establishes the OIS DAD was not connected  
13 to the 2006 Mercedes-Benz ML350 being certified, resulting in the issuance of a fraudulent smog  
14 Certificate of Compliance.

15           **30. Clean Plug Number 9:**

16           a.    Cummings review of the OIS Test Data contained in the BAR's VID indicates that on  
17 November 24, 2015, Respondent Mark Thomas Espinoza inspected a 2008 Dodge Sprinter 2500  
18 and A Street Smog Check Hayward issued smog Certificate of Compliance #QA389665C. The  
19 OIS Test Details for the 2008 Dodge Sprinter 2500 shows no eVIN, the communication protocol  
20 is listed as I9140808, and the PID count was 17. Comparative OIS Test data shows that similar  
21 2008 Dodge Sprinter 2500 vehicles report the correct eVIN, report an expected communication  
22 protocol of ICAN11bt5 and an expected PID count of 32.

23           b.    The discrepancies in the OIS Test Data establishes the OIS DAD was not connected  
24 to the 2008 Dodge Sprinter 2500 being certified, resulting in the issuance of a fraudulent smog  
25 Certificate of Compliance.

26           **31. Clean Plug Number 10:**

27           a.    Cummings review of the OIS Test Data contained in the BAR's VID indicates that on  
28 January 12 , 2016, Respondent Mark Thomas Espinoza inspected a 2009 Pontiac G6 GT and A

1 Street Smog Check Hayward issued smog Certificate of Compliance #YV732757C. The OIS  
2 Test Details for the 2009 Pontiac G6 GT shows no eVIN, the communication protocol is listed as  
3 I9140808, and the PID count was 17. Comparative OIS Test data shows that similar 2009  
4 Pontiac G6 GT vehicles report the correct cVIN, report an expected communication protocol of  
5 ICAN11bt5 and an expected PID count of 44/7.

6 b. The discrepancies in the OIS Test Data establishes the OIS DAD was not connected  
7 to the 2009 Pontiac G6 GT being certified, resulting in the issuance of a fraudulent smog  
8 Certificate of Compliance.

9 **32. Clean Plug Number 11:**

10 a. Cummings review of the OIS Test Data contained in the BAR's VID indicates that on  
11 February 9, 2016, Respondent Mark Thomas Espinoza inspected a 2006 Chevrolet Trailblazer  
12 EXT LS/LT and A Street Smog Check Hayward issued smog Certificate of Compliance  
13 #YX627656C. The OIS Test Details for the 2006 Chevrolet Trailblazer shows no eVIN, the  
14 communication protocol is listed as I9140808, and the PID count was 17. Comparative OIS Test  
15 data shows that similar 2006 Chevrolet Trailblazer EXT LS/LT vehicles report the correct eVIN,  
16 report an expected communication protocol of JVPW and an expected PID count of 19.

17 b. The discrepancies in the OIS Test Data establishes the OIS DAD was not connected  
18 to the 2009 Pontiac G6 GT being certified, resulting in the issuance of a fraudulent smog  
19 Certificate of Compliance.

20 **FIRST CAUSE FOR DISCIPLINE**

21 **(Making or Authorizing Untrue or Misleading Statements)**

22 32. Respondent, Romcil Group, LLC, owner, Sameer Tivare and Priya Tivare, partners,  
23 doing business as A Street Smog Check Hayward, has subjected its Automotive Repair Dealer  
24 Registration and Smog Check Station License to disciplinary action pursuant to Business and  
25 Professions Code section 9884.7, subdivision (a)(1), in that it issued eleven fraudulent certificates  
26 of compliance and failed to comply with the Automotive Repair Act as set forth in paragraphs 20-  
27 32, above.

28 **SECOND CAUSE FOR DISCIPLINE**

1 (Fraud)

2 33. Respondent, Romeil Group, LLC, owner, Sameer Tivare and Priya Tivare, partners,  
3 doing business as A Street Smog, has subjected its Automotive Repair Dealer Registration and  
4 Smog Check Station License to disciplinary action pursuant to Business and Professions Code  
5 section 9884.7, subdivision (a)(4), in that it issued two fraudulent certificates of compliance as set  
6 forth in paragraphs 20-32, above.

7 **THIRD CAUSE FOR DISCIPLINE**

8 **(Failure to Comply with the Automotive Repair Act)**

9 34. Respondent, Romeil Group, LLC, owner, Sameer Tivare and Priya Tivare, partners,  
10 doing business as A Street Smog Check Hayward, has subjected its Automotive Repair Dealer  
11 Registration and Smog Check Station License to disciplinary action pursuant to Business and  
12 Professions Code section 9884.7, subdivision (a)(6) and Health and Safety Code section 44072.2,  
13 subdivisions (a) and (c), in that it failed to comply with the Automotive Repair Act and sections  
14 of the Code and applicable regulations as set forth in paragraphs 20-32, above. The violations are  
15 as follows:

16 a. **Health & Safety Code, section 44012, subdivision (f):** Respondent, A Street Smog  
17 Check Hayward, Romeil Group, LLC, owner, Sameer Tivare and Priya Tivare, partners, failed to  
18 follow test procedures in accordance with the OIS specifications when it failed to properly  
19 conduct the functional portion of the smog inspection by failing to connect eleven vehicles to the  
20 BAR-OIS when they were being certified.

21 b. **Health & Safety Code, section 44032:** Respondent, A Street Smog Check Hayward,  
22 Romeil Group, LLC, owner, Sameer Tivare and Priya Tivare, partners, failed to ensure that the  
23 emission control tests were performed in accordance with the procedures prescribed by the  
24 department.

25 c. **Cal. Code Regs., tit. 16, section 3340.30, subdivision (a):** Respondent, A Street  
26 Smog Check Hayward, Romeil Group, LLC, owner, Sameer Tivare and Priya Tivare, partners,  
27 failed to inspect and test a vehicle in accordance with Health & Safety Code sections 44012.  
28

1 d. Cal. Code Regs., tit. 16, section 3340.35, subdivision (c): Respondent, A Street  
2 Smog Check Hayward, Romeil Group, LLC, owner, Sameer Tivare and Priya Tivare, partners,  
3 falsely or fraudulently issued certificates of compliance for eleven vehicles that had not been  
4 inspected in accordance with the procedures specified in Cal. Code Regs., tit. 16, section 3340.42.

5 **FOURTH CAUSE FOR DISCIPLINE**

6 **(Dishonesty, Fraud, Deceit)**

7 35. Respondent, A Street Smog, Romeil Group, LLC, owner, Sameer Tivare and Priya  
8 Tivare, partners, has subjected its Automotive Repair Dealer Registration and Smog Check  
9 Station License to disciplinary action pursuant to Health and Safety Code section 44072.2,  
10 subdivision (d), in that it committed acts involving dishonesty, fraud or deceit, whereby another  
11 was injured, by issuing eleven fraudulent certificates of compliance as set forth in paragraphs 20-  
12 32, above.

13 **PRAYER**

14 WHEREFORE, Complainant requests that a hearing be held on the matters alleged in this  
15 Accusation, and that following the hearing, the Director of Consumer Affairs issue a decision:

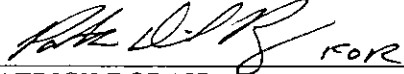
16 1. Revoking or suspending Automotive Repair Dealer Registration Number ARD  
17 279148, issued to Romeil Group LLC, Owner; Sameer Balkrishna Tivare and Priya Tivare,  
18 Members, dba A Street Smog Check Hayward;

19 2. Revoking or suspending Smog Check, Test Only, Station License Number TC  
20 279148, issued to Romeil Group LLC, Owner; Sameer Balkrishna Tivare and Priya Tivare,  
21 Members, dba A Street Smog Check Hayward ;

22 3. Ordering Romeil Group LLC, Owner; Sameer Balkrishna Tivare and Priya Tivare,  
23 Members, to pay the Bureau of Automotive Repair the reasonable costs of the investigation and  
24 enforcement of this case, pursuant to Business and Professions Code section 125.3;

25 4. Taking such other and further action as deemed necessary and proper.

26 DATED: 7-12-16

  
27 PATRICK DORAIS  
28 Chief  
Bureau of Automotive Repair  
Department of Consumer Affairs

State of California  
*Complainant*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

SF2016900209  
90671760.docx