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

12 In the Matter of the Accusation Against:

Case No. 79/16-13138

13 **PRO SMOG**
HASSAN MOHAMMAD
14 **ALRAWASHDEH, OWNER**
6076 N. 6th Street
15 Fresno, CA 93710
4485 E. Belmont Ave.
16 Fresno, CA 93702

ACCUSATION

17 **Automotive Repair Dealer Reg. No. ARD**
280040
18 **Smog Check Test Only Station License No.**
TC 280040

19
20 and

21 **HASSAN MOHAMMAD**
ALRAWASHDEH
6076 N. 6th St.
22 Fresno, CA 93710

23 **Smog Check Inspector License No. EO**
637726

24 Respondents.
25

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1 Complainant alleges:

2 **PARTIES**

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

5 2. On or about April 23, 2015, the Director of Consumer Affairs (Director) issued
6 Automotive Repair Dealer Registration Number ARD 280040 to Hassan Mohammad
7 Alrawashdeh (Respondent), owner of Pro Smog. The registration was in full force and effect at
8 all times relevant to the charges brought herein and will expire on April 30, 2018, unless renewed.

9 3. On or about May 21, 2015, the Director issued Smog Check Test Only Station
10 License Number TC 280040 to Respondent, owner of Pro Smog. The Smog Check Test Only
11 Station License was in full force and effect at all times relevant to the charges brought herein and
12 will expire on April 30, 2018, unless renewed.

13 4. On or about January 12, 2015, the Director issued Smog Check Inspector License
14 Number EO 637726 to Respondent. The Smog Check Inspector License was in full force and
15 effect at all times relevant to the charges brought herein and will expire on December 31, 2018,
16 unless renewed.

17 **JURISDICTION**

18 5. Business and Professions Code ("Bus. & Prof. Code") section 9884.7 provides that
19 the Director may revoke an automotive repair dealer registration.

20 6. Bus. & Prof. Code section 9884.13 provides, in pertinent part, that the expiration of a
21 valid registration shall not deprive the Director of jurisdiction to proceed with a disciplinary
22 proceeding against an automotive repair dealer or to render a decision temporarily or permanently
23 invalidating (suspending or revoking) a registration

24 7. Health and Safety Code ("Health & Saf. Code") section 44002 provides, in pertinent
25 part, that the Director has all the powers and authority granted under the Automotive Repair Act
26 for enforcing the Motor Vehicle Inspection Program.

27 8. Health & Saf. Code section 44072.6 provides, in pertinent part, that the expiration or
28 suspension of a license by operation of law, or by order or decision of the Director of Consumer

1 Affairs, or a court of law, or the voluntary surrender of the license shall not deprive the Director
2 of jurisdiction to proceed with disciplinary action.

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

6 **STATUTORY AND REGULATORY PROVISIONS**

7 10. Bus. & Prof. Code section 9884.7 states, in pertinent part:

8 (a) The director, where the automotive repair dealer cannot show there
9 was a bona fide error, may deny, suspend, revoke, or place on probation the
10 registration of an automotive repair dealer for any of the following acts or omissions
11 related to the conduct of the business of the automotive repair dealer, which are done
12 by the automotive repair dealer or any automotive technician, employee, partner,
13 officer, or member of the automotive repair dealer.

14 (1) Making or authorizing in any manner or by any means whatever any
15 statement written or oral which is untrue or misleading, and which is known, or which
16 by the exercise of reasonable care should be known, to be untrue or misleading.

17 ...

18 (4) Any other conduct that constitutes fraud.

19 ...

20 (c) Notwithstanding subdivision (b), the director may suspend, revoke or
21 place on probation the registration for all places of business operated in this state by
22 an automotive repair dealer upon a finding that the automotive repair dealer has, or is,
23 engaged in a course of repeated and willful violations of this chapter, or regulations
24 adopted pursuant to it.

25 11. Bus. & Prof. Code section 22, subdivision (a), states:

26 "Board" as used in any provision of this Code, refers to the board in
27 which the administration of the provision is vested, and unless otherwise expressly
28 provided, shall include "bureau," "commission," "committee," "department,"
"division," "examining committee," "program," and "agency."

12 12. Bus. & Prof. Code section 477, subdivision (b), states, in pertinent part, that a
13 "license" includes "registration" and "certificate."

14 13. Health & Saf. Code section 44072.2 states, in pertinent part:

15 The director may suspend, revoke, or take other disciplinary action
16 against a license as provided in this article if the licensee, or any partner, officer, or

director thereof, does any of the following:

(a) Violates any section of this chapter [the Motor Vehicle Inspection Program (Health and Saf. Code § 44000, et seq.)) and the regulations adopted pursuant to it, which related to the licensed activities.

...

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

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

14. Health & Saf. Code section 44072.10 states, in pertinent part:

...

(c) The department shall revoke the license of any smog check technician or station licensee who fraudulently certifies vehicles or participates in the fraudulent inspection of vehicles. A fraudulent inspection includes, but is not limited to, all of the following:

...

(4) Intentional or willful violation of this chapter or any regulation, standard, or procedure of the department implementing this chapter

15. Health & Saf. Code section 44024.5, subdivision (a), states:

The department shall compile and maintain statistical and emissions profiles and data from motor vehicles that are subject to the motor vehicle inspection program. The department may use data from any source, including remote sensing data, in use data, and other motor vehicle inspection program data, to develop and confirm the validity of the profiles, to evaluate the program, and to assess the performance of smog check stations. The department shall undertake these requirements directly or seek a qualified vendor for these services.

16. Health & Saf. Code section 44037 states, in pertinent part:

(a) The department shall compile and maintain records, using the sampling methodology necessary to ensure their scientific validity and reliability, of tests and repairs performed by qualified smog check technicians at licensed smog check stations pursuant to this chapter on all of the following information:

(1) The motor vehicle identification information and the test data collected at the station.

...

(5) Data received and compiled through the use of the centralized computer database and computer network to be established pursuant to Section 44037.1, and any other information determined to be essential by the department for program enhancement to achieve greater efficiency, consumer protection, cost-effectiveness, convenience, or emission reductions

1 17. Health & Saf. Code section 44037.1 states, in pertinent part:

2 (a) On or before January 1, 1995, the department shall design and
3 establish the equipment necessary to operate a centralized computer data base and
4 computer network that is readily accessible by all licensed smog check technicians on
5 a real time basis.

6 (b) The centralized computer data base and network shall be designed
7 with all of the following capabilities:

8 ...

9 (2) To provide smog check technicians and the department with
10 information as to the date and result of prior smog check tests performed on each
11 vehicle to discourage vehicle owners from shopping for certificates of compliance
12 and to permit the department to identify smog check stations for further investigation
13 as potential violators of this chapter.

14 (3) To provide the department with data on the failure rates and repair
15 effectiveness for vehicles of each make and model year on a statewide basis, and by
16 smog check station and technician, to facilitate identification of smog check stations
17 and technicians as potential violators of this chapter.

18 ...

19 (8) To be compatible with the department's recordkeeping and
20 compilation requirements established by Section 44037.

21 ...

22 (c) After January 1, 1995, each smog check station shall transmit vehicle
23 data emission test results to the department's centralized data base. Each smog check
24 station shall also transmit vehicle data and emission measurements made before and
25 after repair

26 18. California Code of Regulations, title 16, section 3340.17 states, in pertinent part:

27 ...

28 (c) Vehicle data and test results from the OBD Inspection System (OIS)
shall be transmitted to the bureau's centralized database

COST RECOVERY

19 19. Bus. & Prof. Code section 125.3 provides, in pertinent part, that a Board may request
20 the administrative law judge to direct a licentiate found to have committed a violation or
21 violations of the licensing act to pay a sum not to exceed the reasonable costs of investigation and
22 enforcement of the case.
23

REVIEW OF OIS TEST DATA FOR PRO SMOG

Background

20. On March 9, 2015, California's Smog Check Program was updated to keep pace with ever-advancing technology. The program update requires the use of an On-Board Diagnostic Inspection System (BAR-OIS). BAR-OIS is the smog check equipment required in all areas of the State 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), computer, bar code scanner, and printer.

21. The DAD is an On Board Diagnostic (OBD) scan tool that, when requested by the California BAR-OIS software, retrieves OBD data from the vehicle. The DAD connects between the BAR-OIS computer and the vehicle's diagnostic link connector. The bar code scanner is used to input technician information, the vehicle identification number, and DMV renewal information. The vehicle identification number (VIN) that is physically present on all vehicles is required to be programmed into the vehicle's On-Board Diagnostics – Generation II (OBD II) on 2005 and newer vehicles, and on many occasions was programmed into the OBD II computer in earlier model-years. The electronically programmed VIN is referred to as the "eVIN," is captured by the Bureau during a smog check inspection, and should match the physical VIN on the vehicle. The printer is used to provide a Vehicle Inspection Report (VIR), which shows the inspection results and the Smog Check Certificate of Compliance Number for passing vehicles. Data retrieved and recorded during an OIS smog check includes the eVIN, the communication protocol¹, and the number of Parameter Identifications (PID's)².

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Factual Allegations

¹ The OBD II communication protocol describes the specified communication "language" used by the OBD II computer to communicate to scan tools and other devices such as the BAR-OIS. The communication protocol is programmed into the OBD II computer during manufacture and does not change.

² PID's are data points reported by the OBD II computer to the scan tool or BAR-OIS (for example, engine speed (rpm), vehicle speed, engine temperature, etc.) The PID count is the number of data points reported by the OBD II computer and is programmed during manufacture.

22. Bureau Representative D. B. reviewed OIS test data pertaining to smog inspections conducted at Respondent's smog check facility, Pro Smog. D. B. found that the facility's smog check technician, Respondent, performed smog inspections on the four vehicles identified below using a method known as "clean plugging,"³ resulting in the issuance of fraudulent certificates of compliance for the vehicles.

Vehicle 1:

23. The OIS test data showed that on July 18, 2016, Respondent allegedly performed a smog inspection on a 2000 Toyota Tundra Limited ("Vehicle 1"), resulting in the issuance of electronic Smog Certificate of Compliance No. ZH117964C. The OIS test details for Vehicle 1 revealed the following:

- a. The eVIN is not reported during smog inspections on 2000 Toyota Tundra Limited vehicles.
- b. The eVIN recorded during the inspection did not match the actual VIN on the vehicle.
- c. The PID count and communication protocol recorded during the smog check on Vehicle 1 were not consistent with the PID count and expected communication protocol for 2000 Toyota Tundra Limited vehicles.

24. The Bureau's VID data showed that on June 30, 2016, a smog inspection was conducted on Vehicle 1 at another smog check facility, and that no eVIN was transmitted to the VID during the inspection. Further, in that earlier test, the communication protocol and PID count recorded during the inspection on Vehicle 1 were consistent with the communication protocol and PID count for that make and model vehicle. D. B. therefore concluded that the DAD was not connected to Vehicle 1 during the alleged smog inspection of July 18, 2016, resulting in the issuance of a fraudulent smog certificate of compliance for Vehicle 1.

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³ Clean-plugging is the use of a vehicle's properly functioning OBD II system, or another source, to generate passing diagnostic readings for the purpose of issuing a fraudulent smog certificate of compliance to another vehicle that is not in compliance with the Smog Check Program and/or is not present for testing.

1 25. Additionally, the Bureau's VID data showed that on April 14, 2016, Respondent
2 performed a smog inspection on a 2006 Toyota Tundra Double Cab SR5 at Pro Smog. The VID
3 data revealed the following:

4 a. The eVIN for the 2006 Toyota Tundra Double Cab that was transmitted to the VID
5 was the same eVIN that was recorded during the alleged smog inspection on Vehicle 1 on July
6 18, 2016.

7 b. The communication protocol and PID count recorded during the inspection on the
8 2006 Toyota Tundra Double Cab were consistent with the communication protocol and PID count
9 recorded during the inspection on Vehicle 1 on July 18, 2016.

10 26. D. B. concluded that Respondent used the 2006 Toyota Tundra Double Cab's
11 properly functioning OBD II system during the alleged smog inspection on Vehicle 1, resulting in
12 the issuance of a fraudulent smog certificate of compliance for Vehicle 1 on July 18, 2016.

13 **Vehicle 2:**

14 27. The OIS test data showed that on October 1, 2016, Respondent allegedly performed a
15 smog inspection on a 2000 Chevrolet Silverado K1500 ("Vehicle 2"), resulting in the issuance of
16 electronic Smog Certificate of Compliance No. QE523497C. The OIS test details for Vehicle 2
17 showed the following:

18 a. The eVIN is not reported during smog inspections on 2000 Chevrolet Silverado
19 K1500 vehicles.

20 b. The eVIN recorded during the inspection did not match the physical VIN on the
21 vehicle.

22 c. The PID count recorded during the smog check on Vehicle 2 was not consistent with
23 the PID count for 2000 Chevrolet Silverado K1500 vehicles.

24 28. D. B. concluded that the DAD was not connected to Vehicle 2 during the alleged
25 smog inspection on October 1, 2016.

26 29. The Bureau's VID data showed that on October 1, 2016, Respondent conducted a
27 smog inspection on a 2001 GMC Yukon at Pro Smog and that the eVIN, communication
28 protocol, and PID count recorded during the inspection were the same as those transmitted during

1 the alleged smog check on Vehicle 2 on October 1, 2016. D. B. therefore concluded that
2 Respondent used the 2001 GMC Yukon's properly functioning OBD II system during the smog
3 inspection of Vehicle 2 on October 1, 2016, resulting in the issuance of a fraudulent smog
4 certificate of compliance for Vehicle 2.

5 **Vehicle 3:**

6 30. The OIS test data showed that on October 27, 2016, Respondent allegedly performed
7 a smog inspection on a 2005 Toyota Tundra Access Cab SR5 ("Vehicle 3"), resulting in the
8 issuance of electronic Smog Certificate of Compliance No. QG381029C. The OIS test details for
9 Vehicle 3 showed the following:

10 a. The eVIN recorded during the inspection did not match the physical VIN on the
11 vehicle.

12 b. The PID count recorded during the smog check on Vehicle 3 was not consistent with
13 the PID count for 2005 Toyota Tundra Access Cab SR5 vehicles.

14 31. D. B. concluded that the DAD was not connected to Vehicle 3 during the alleged
15 smog inspection of October 27, 2016.

16 32. The Bureau's VID data showed that on January 20, 2015, a smog inspection was
17 conducted on a 2006 Toyota Tacoma Prerunner Double Cab at another smog check facility, and
18 that eVIN, communication protocol, and PID count recorded during the inspection were the same
19 as those transmitted during the alleged smog check on Vehicle 3 on October 27, 2016. D. B.
20 therefore concluded that Respondent used the 2006 Toyota Tacoma Prerunner Double Cab's
21 properly functioning OBD II system during the alleged smog inspection of Vehicle 3 on October
22 27, 2016, resulting in the issuance of a fraudulent smog certificate of compliance for Vehicle 3.

23 **Vehicle 4:**

24 33. The OIS test data showed that on November 7, 2016, Respondent allegedly
25 performed a smog inspection on a 2006 Honda CR-V LX ("Vehicle 4"), resulting in the issuance
26 of electronic Smog Certificate of Compliance No. QG654089C. The OIS test details for Vehicle
27 4 showed the following:

28 ///

1 a. The eVIN recorded during the inspection did not match the physical VIN on the
2 vehicle.

3 b. The communication protocol and PID count recorded during the alleged smog check
4 on Vehicle 4 were not consistent with the communication protocol and PID count for 2006 Honda
5 CR-V LX vehicles.

6 34. D. B. concluded that the DAD was not connected to Vehicle 4 during the alleged
7 smog inspection of November 7, 2016.

8 35. The Bureau's VID data showed that on November 2, 2016, Respondent conducted a
9 smog inspection on a 2008 Honda Civic LX at Pro Smog, and that the eVIN transmitted to the
10 VID was the same eVIN that was recorded during the alleged smog inspection on Vehicle 4 on
11 November 7, 2016. Further, the communication protocol and PID count recorded during the
12 inspection on the 2008 Honda Civic LX were consistent with the communication protocol and
13 PID count recorded during the alleged smog inspection on Vehicle 4 on November 7, 2016. D. B.
14 therefore concluded that Respondent used the 2008 Honda Civic LX's properly functioning OBD
15 II system during the alleged smog inspection on Vehicle 4 on November 7, 2016, resulting in the
16 issuance of a fraudulent smog certificate of compliance for Vehicle 4.

17 **FIRST CAUSE FOR DISCIPLINE**

18 **(Untrue or Misleading Statements)**

19 36. Respondent's registration is subject to disciplinary action pursuant to Bus. & Prof.
20 Code section 9884.7, subdivision (a)(1), in that Respondent made or authorized statements which
21 he knew or in the exercise of reasonable care should have known to be untrue or misleading, as
22 follows: Respondent certified that Vehicles 1 through 4, identified in paragraphs 23 through 35
23 above, had passed inspection and were in compliance with applicable laws and regulations. In
24 fact, Respondent conducted the smog inspections on the vehicles using clean-plugging methods in
25 that he substituted or used a different vehicle during the inspections in order to issue smog
26 certificates of compliance for the vehicles, and did not test or inspect the vehicles as required by
27 Health & Saf. Code section 44012.

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1 **SECOND CAUSE FOR DISCIPLINE**

2 **(Fraud)**

3 37. Respondent's registration is subject to disciplinary action pursuant to Bus. & Prof.
4 Code section 9884.7, subdivision (a)(4), in that Respondent committed acts which constitute
5 fraud by issuing electronic smog certificates of compliance for Vehicles 1 through 4, identified in
6 paragraphs 23 through 35 above, without ensuring that bona fide inspections were performed of
7 the emission control devices and systems on the vehicles, thereby depriving the People of the
8 State of California of the protection afforded by the Motor Vehicle Inspection Program.

9 **THIRD CAUSE FOR DISCIPLINE**

10 **(Violations of the Motor Vehicle Inspection Program)**

11 38. Respondent's smog check test only station license is subject to disciplinary action
12 pursuant to Health & Saf. Code section 44072.2, subdivision (a), in that Respondent failed to
13 comply with the following sections of that Code:

14 a. **Section 44012:** Respondent failed to ensure that the emission control tests were
15 performed on Vehicles 1 through 4, identified in paragraphs 23 through 35 above, in accordance
16 with procedures prescribed by the department.

17 b. **Section 44015:** Respondent issued electronic smog certificates of compliance for
18 Vehicles 1 through 4, identified in paragraphs 23 through 35 above, without ensuring that the
19 vehicles were properly tested and inspected to determine if they were in compliance with Health
20 & Saf. Code section 44012.

21 **FOURTH CAUSE FOR DISCIPLINE**

22 **(Failure to Comply with Regulations Pursuant to the Motor Vehicle Inspection Program)**

23 39. Respondent's smog check test only station license is subject to disciplinary action
24 pursuant to Health & Saf. Code section 44072.2, subdivision (c), in that Respondent failed to
25 comply with provisions of California Code of Regulations, title 16, as follows:

26 a. **Section 3340.35, subdivision (c):** Respondent issued electronic smog certificates of
27 compliance for Vehicles 1 through 4, identified in paragraphs 23 through 35 above, even though
28 the vehicles had not been inspected in accordance with Section 3340.42.

b. **Section 3340.42**: Respondent failed to ensure that the required smog tests were conducted on Vehicles 1 through 4, identified in paragraphs 23 through 35 above, in accordance with the Bureau's specifications.

FIFTH CAUSE FOR DISCIPLINE

(Dishonesty, Fraud or Deceit)

40. Respondent's smog check test only station license is subject to disciplinary action pursuant to Health & Saf. Code section 44072.2, subdivision (d), in that Respondent committed dishonest, fraudulent, or deceitful acts whereby another was injured by issuing electronic smog certificates of compliance for Vehicles 1 through 4, identified in paragraphs 23 through 35 above, without ensuring that bona fide inspections were performed of the emission control devices and systems on the vehicles, thereby depriving the People of the State of California of the protection afforded by the Motor Vehicle Inspection Program.

SIXTH CAUSE FOR DISCIPLINE

(Violations of the Motor Vehicle Inspection Program)

41. Respondent's smog check inspector license is subject to disciplinary action pursuant to Health & Saf. Code section 44072.2, subdivision (a), in that Respondent failed to comply with section 44012 of that Code in a material respect, as follows: Respondent failed to perform the emission control tests on Vehicles 1 through 4, identified in paragraphs 23 through 35 above, in accordance with procedures prescribed by the department.

SEVENTH CAUSE FOR DISCIPLINE

(Failure to Comply with Regulations Pursuant to the Motor Vehicle Inspection Program)

42. Respondent's smog check inspector license is subject to disciplinary action pursuant to Health & Saf. Code section 44072.2, subdivision (c), in that Respondent failed to comply with provisions of California Code of Regulations, title 16, as follows:

a. **Section 3340.30, subdivision (a)**: Respondent failed to inspect and test Vehicles 1 through 4, identified in paragraphs 23 through 35 above, in accordance with Health & Saf. Code sections 44012 and 44035, and California Code of Regulations, title 16, section 3340.42.

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b. **Section 3340.42:** Respondent failed to conduct the required smog tests on Vehicles 1 through 4, identified in paragraphs 23 through 35 above, in accordance with the Bureau's specifications.

EIGHTH CAUSE FOR DISCIPLINE

(Dishonesty, Fraud or Deceit)

43. Respondent's smog check inspector license is subject to disciplinary action pursuant to Health & Saf. Code section 44072.2, subdivision (d), in that Respondent committed dishonest, fraudulent, or deceitful acts whereby another was injured by issuing electronic smog certificates of compliance for Vehicles 1 through 4, identified in paragraphs 23 through 35 above, without performing bona fide inspections of the emission control devices and systems on the vehicles, thereby depriving the People of the State of California of the protection afforded by the Motor Vehicle Inspection Program.

MATTERS IN AGGRAVATION

44. To determine the degree of discipline, if any, to be imposed on Respondent, Complainant alleges as follows:

a. On or about September 30, 2015, the Bureau issued Citation No. C2015-2293 against Respondent for violating Health & Saf. Code section 44012, subdivision (f) (failure to perform a visual/functional check of emission control devices according to procedures prescribed by the department). On or about August 27, 2015, Respondent had issued a certificate of compliance to a Bureau undercover vehicle with a missing Catalytic Converter (CAT). The Bureau assessed a civil penalty of \$1,000 against Respondent for the violation. Respondent paid the fine on January 28, 2016.

b. On or about September 30, 2015, the Bureau issued Citation No. M2015-2294 against Respondent for violating Health and Safety Code section 44032. On or about August 27, 2015, Respondent had issued a certificate of compliance to a Bureau undercover vehicle with a missing Catalytic Converter (CAT). The Bureau ordered Respondent to complete an eight-hour certified retraining course. Respondent completed the training on February 13, 2016.

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1 **OTHER MATTERS**

2 45. Pursuant to Bus. & Prof. Code section 9884.7, subdivision (c), the Director may
3 suspend, revoke, or place on probation the registration for all places of business operated in this
4 state by Respondent Hassan Mohammad Alrawashdeh, owner of Pro Smog, upon a finding that
5 Respondent has, or is, engaged in a course of repeated and willful violations of the laws and
6 regulations pertaining to an automotive repair dealer.

7 46. Pursuant to Health & Saf. Code section 44072.8, if Smog Check Test Only Station
8 License Number TC 280040, issued to Respondent Hassan Mohammad Alrawashdeh, owner of
9 Pro Smog, is revoked or suspended, any additional license issued under Chapter 5 of Part 5 of
10 Division 2b of the Health and Safety Code in the name of said licensee may be likewise revoked
11 or suspended by the Director.

12 47. Pursuant to Health & Saf. Code section 44072.8, if Smog Check Inspector License
13 Number EO 637726, issued to Respondent Hassan Mohammad Alrawashdeh, is revoked or
14 suspended, any additional license issued under Chapter 5 of Part 5 of Division 2b of the Health
15 and Safety Code in the name of said licensee may be likewise revoked or suspended by the
16 Director.

17 **PRAYER**

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

20 1. Revoking or suspending Automotive Repair Dealer Registration Number ARD
21 280040, issued to Hassan Mohammad Alrawashdeh, owner of Pro Smog;

22 2. Revoking or suspending any other automotive repair dealer registration issued to
23 Hassan Mohammad Alrawashdeh;

24 3. Revoking or suspending Smog Check Test Only Station License Number TC 280040,
25 issued to Hassan Mohammad Alrawashdeh, owner of Pro Smog;

26 4. Revoking or suspending Smog Check Inspector License Number EO 637726, issued
27 to Hassan Mohammad Alrawashdeh;

28 ///

1 5. Revoking or suspending any additional license issued under Chapter 5 of Part 5 of
2 Division 2b of the Health and Safety Code in the name of Hassan Mohammad Alrawashdeh

3 6. Ordering Hassan Mohammad Alrawashdeh, owner of Pro Smog, to pay the Director
4 of Consumer Affairs the reasonable costs of investigation and enforcement of this case, pursuant
5 to Business and Professions Code section 125.3; and

6 7. Taking such other and further action as deemed necessary and proper.
7
8
9

10 DATED:

June 29, 2017

Patrick Dorais

PATRICK DORAIS

Chief

Bureau of Automotive Repair

Department of Consumer Affairs

State of California

Complainant

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15 SA2017107267
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