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

12 In the Matter of the Accusation Against:

Case No. 79/24-15584

13 **OSCAR ANTONIO FLORES, DBA**
14 **DANIEL SMOG CHECK TEST ONLY**
450 N Waterman Ave., Unit D
San Bernardino, CA 92410

ACCUSATION

15 **Automotive Repair Dealer Registration No.**
16 **ARD 287850**
17 **Smog Check, Test-Only, Station License No.**
18 **TC 287850,**

19 **and**

20 **OSCAR ANTONIO FLORES**
21 450 N Waterman Ave., Unit D
San Bernardino, CA 92410

22 **Smog Check Inspector License No. EO**
23 **640105**

Respondent.

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 June 26, 2017, the Bureau of Automotive Repair issued Automotive
28 Repair Dealer Registration Number ARD 287850 to Oscar Antonio Flores (Respondent), dba

1 Daniel Smog Check Test Only. The Automotive Repair Dealer Registration was in full force and
2 effect at all times relevant to the charges brought herein and will expire on June 30, 2026, unless
3 renewed.

4 3. On or about August 10, 2017, the Bureau of Automotive Repair issued Smog Check,
5 Test-Only, Station License Number TC 287850 to Respondent, dba Daniel Smog Check Test
6 Only. The Smog Check, Test-Only, Station License was in full force and effect at all times
7 relevant to the charges brought herein and will expire on June 30, 2026, unless renewed.

8 4. On or about October 30, 2017, the Bureau of Automotive Repair issued a STAR
9 station certification to Respondent, dba Daniel Smog Check Test Only. The STAR station
10 certification was suspended on September 14, 2023.

11 5. On or about March 10, 2017, Bureau of Automotive Repair issued Smog Check
12 Inspector License Number EO 640105 to Respondent. The Smog Check Inspector License was in
13 full force and effect at all times relevant to the charges brought herein and will expire on October
14 31, 2026, unless renewed.

15 **JURISDICTION**

16 6. Business and Professions Code ("BPC") section 9884.13 provides, in pertinent part,
17 that the expiration of a valid registration shall not deprive the Director of jurisdiction to proceed
18 with a disciplinary proceeding against an automotive repair dealer or to render a decision
19 temporarily or permanently invalidating (suspending or revoking) a registration.

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

23 8. Section 44072.6 of the HSC provides, in pertinent part, that the expiration or
24 suspension of a license by operation of law, or by order or decision of the Director of Consumer
25 Affairs, or a court of law, or the voluntary surrender of the license shall not deprive the Director
26 of jurisdiction to proceed with disciplinary action.

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STATUTORY PROVISIONS

9. Section 9884.7 of the BPC states, in pertinent part:

“(a) The director, where the automotive repair dealer cannot show there was a bona fide error, may refuse to validate, or may invalidate temporarily or permanently, 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

(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.”

10. Section 44012 of the HSC provides, in pertinent part, that tests at smog check stations shall be performed in accordance with procedures prescribed by the department.

11. Section 44015, subdivision (b), of the HSC provides that a certificate of compliance shall be issued if a vehicle meets the requirements of HSC section 40012.

12. Section 44032 of the HSC states, in pertinent part, that: (1) no person may perform tests or repairs of emission control devices or systems of motor vehicles required by the Motor Vehicle Inspection Program unless the person performing the test or repair is a licensed qualified smog check technician; and (2) all tests must be conducted in accordance with section 44012 (i.e. Motor Vehicle Inspection Program Requirements).

13. Section 44059 of the HSC provides:

“The willful making of any false statement or entry with regard to a material matter in any oath, affidavit, certificate of compliance or noncompliance, or application form which is required by this chapter or Chapter 20.3 (commencing with Section 9880) of Division 3 of the Business and Professions Code, constitutes perjury and is punishable as provided in the Penal Code.”

1 “The bureau may suspend or revoke the license of or pursue other legal action against a
2 licensee, if the licensee falsely or fraudulently issues or obtains a certificate of compliance or a
3 certificate of noncompliance.”

4 18. California Code of Regulations (“CCR”), title 16, section 3340.30, subdivision (a),
5 states in pertinent part:

6 “A licensed smog check inspector and/or repair technician shall comply with the following
7 requirements at all times while licensed:

8 “(a) Inspect, test and repair vehicles, as applicable, in accordance with section 44012 of the
9 Health and Safety Code, section 44035 of the Health and Safety Code, and section 3340.42 of this
10 article.

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12 19. CCR, title 16, section 3340.35, subdivision (c), states that a licensed smog check
13 station “shall issue a certificate of compliance or noncompliance to the owner or operator of any
14 vehicle that has been inspected in accordance with the procedures specified in section 3340.42 of
15 this article and has all the required emission control equipment and devices installed and
16 functioning correctly.”

17 20. CCR, title 16, section 3340.41, subdivision (b), provides: “No person shall enter into
18 the emissions inspection system any access or qualification number other than as authorized by
19 the bureau, nor in any way tamper with the emissions inspection system.”

20 21. CCR, title 16, section 3340.42, sets forth specific emissions test methods and
21 procedures which apply to all vehicles inspected in the State of California.

22 **COST RECOVERY**

23 22. Section 125.3, subdivision (a), of the BPC provides, in pertinent part, that a Board
24 “may request the administrative law judge to direct a licensee found to have committed
25 violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the
26 investigation and enforcement of the case.”

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SUMMARY OF OIS SMOG CHECK INSPECTION PROGRAM

23. Beginning 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 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. The DAD is an On Board Diagnostic (OBD) scan tool that, when requested by the California OIS software, retrieves OBD data from the vehicle. All OBD data that the vehicle indicates it supports is requested by the California OIS software and will be retrieved.

24. The DAD connects between the OIS computer and the vehicle's Diagnostic Link Connector (DLC) located in the vehicle's passenger compartment, which allows for the retrieval of information from the vehicle's on-board computer system. The California OIS software requires a continuous Internet connection when performing a Smog Check inspection and the OIS software communicates with BAR's central database through the Internet connection. The bar code scanner is used to input technician information, the vehicle's identification number (VIN), and DMV renewal information. The printer provides a Vehicle Inspection Report (VIR) containing inspection results for motorists and a Smog Check Certificate of Compliance number for passing vehicles.

25. Data retrieved and recorded during an OIS smog check includes: the eVIN, which is the digitally stored VIN programmed by the manufacturer into the vehicle's Powertrain Control Module (PCM); the communication protocol, which is the manufacturer/vehicle specific language the PCM uses to Relay or communicate information. The communication protocol is programmed into the vehicle's on-board computer during manufacture and does not change.

26. Other data retrieved and recorded during an OIS smog check includes the number of Parameter Identifications (PIDs), which refers to the number of specific data values that the vehicle's PCM uses related to emissions controls. The specific data values associated with a vehicle's PIDs are also retrieved and recorded during an OIS smog check inspection. That data include things such as the vehicle's engine speed, throttle position, manifold absolute pressure

1 and the engine's mass air flow readings throughout an inspection. Accordingly, the following
2 types of data are recorded during an OIS smog check inspection:

- 3 • Engine speed in revolutions per minute (RPM)
- 4 • Throttle position as measured by a throttle position sensor (TPS) mounted onto the
5 throttle shaft. Measured in a percentage of opening from 0% at idle and near or up
6 to 100% at full throttle.
- 7 • Manifold absolute pressure as measured by a manifold air pressure sensor (MAP)
8 connected to an intake manifold source, measured in kilo pascals (kpa). Typical
9 readings for a normally aspirated vehicle as follows: 0 kpa being absolute vacuum,
10 25kpa to 45kpa at idle, 101 kpa at full throttle, same as atmospheric pressure at sea
11 level.
- 12 • Mass air flow as measured by a mass air flow sensor (MAF) mounted in the engine's
13 air intake tract. Measured in grams per second (gps).
- 14 • Ignition timing is set by the vehicle PCM based on engine speed and load, and is
15 measured in degrees Before Top Dead Center (BTDC).

16 27. BAR has become aware of methods that some Smog Check stations and Smog Check
17 inspectors use to fraudulently issue smog certificates to vehicles that will not pass a Smog Check
18 test, or in some instances, are not even present during the time that the test is performed. One
19 such method, which is known as "clean plugging", involves using another vehicle's properly
20 functioning OBD II system, or another source such as a defeat device/simulator, to generate
21 passing data readings or diagnostic information for the purpose of fraudulently issuing smog
22 certificates to vehicles that are not in smog compliance and/or are not present for testing.

23 28. Defeat devices attempt to simulate engine operation during a Smog Check inspection
24 by transmitting OBD II data to the VID that has been modified or replaced entirely for the
25 purportedly inspected vehicle during the functional portion of the OIS inspection. The use of a
26 defeat device/simulator during a Smog Check inspection constitutes clean plugging and is strictly
27 prohibited. As described in more detail below, BAR is able to utilize the data retrieved and
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1 recorded during an OIS smog check to identify inspections in which a defeat device/simulator
2 was used.

3 29. During an OIS Smog Check inspection, the vehicle is monitored and PID data
4 readings are obtained while the engine is idling and also when the smog check inspector is
5 prompted to increase the engine speed to a certain level and then maintain that speed for a period
6 of time. In order for the engine speed to increase, the throttle must be opened to increase airflow
7 through the engine. An increase in the throttle position, increases the engine speed as measured
8 in RPM and results in a corresponding increase in the mass air flow rate (MAF) as well as a
9 change in the manifold absolute pressure (MAP).

10 **FACTUAL BACKGROUND**

11 30. Clean plugging is apparent in cases where the data recorded during an OIS smog
12 check shows that the engine speed as measured in RPM increases during the test but the throttle
13 position remains unchanged, the mass air flow rate is unchanged and the manifold absolute
14 pressure is unchanged. Because engine speed as measured in RPM cannot increase without
15 corresponding increases in the throttle position and MAF, changes in the MAP and ignition
16 timing advances, test data in such cases shows that a defeat device was used to simulate engine
17 speed (RPM) readings for a vehicle that was not actually tested.

18 31. A Bureau program representative initiated an investigation in which he reviewed
19 specific OIS Test Data for inspections performed at Respondent's smog check station from
20 October 6, 2023 to May 27, 2024. The investigation revealed that the data related to certain
21 vehicles certified by Respondent contained a pattern of unmistakable discrepancies between the
22 PID information transmitted during the inspections and the recognized and scientifically
23 established characteristics of internal combustion engine operation.

24 32. Specifically, the Bureau program representative identified 10 instances in which the
25 throttle position, ignition timing advance, MAP and/or MAF¹ readings all remained unchanged
26 when the vehicle's engine RPM was increased off idle to the higher RPMs. Such conditions

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28 ¹ Not all vehicle manufacturers include both MAP and MAF parameters. As a result,
many vehicles will have either MAP or MAF parameters rather than both.

could not have occurred if the DAD had been connected to the vehicles that were purportedly being tested instead of a defeat device that simulated engine RPM.

33. The documented discrepancies in the data related to the tests at issue confirm that Respondents engaged in the illegal activity of clean plugging in order to issue fraudulent certificates of compliance for the vehicles at issue. The following chart ("Table 1") illustrates the documented clean plugging activities by Respondents during the period reviewed.

Table 1

Test Date	Vehicle Certified & License No./VIN	Certificate No.	Test Details
October 6, 2023	2000 Toyota Corolla VE VIN # 1NXBR12E2YZ310924	TO243369C	Inspection performed by Respondent. Throttle position, MAF, and ignition timing advance readings unchanged when engine RPM was increased off idle to 1850.
November 4, 2023	2003 Toyota Camry LE VIN # 4T1BF30K13U043765	TO411315C	Inspection performed by Respondent. Throttle position, MAF and ignition timing advance readings unchanged when engine RPM was increased off idle to 1850.
November 12, 2023	2002 Toyota RAV4 VIN # JTEGH20V420054074	TO411323C	Inspection performed by Respondent. Throttle position, MAF and ignition timing advance readings unchanged when engine RPM was increased off idle to 2050.
December 1, 2023	2000 Toyota 4Runner Limited VIN # JT3GN87R4Y0151846	TO411339C	Inspection performed by Respondent. Throttle position, MAF and ignition timing advance readings unchanged when engine RPM was increased off idle to 2250.

January 11, 2024	2004 Toyota Sienna CE VIN # 5TDZA23C64S088478	IX897831C	Inspection performed by Respondent. Throttle position, MAP and ignition timing advance readings unchanged when engine RPM was increased off idle to 1825.
January 19, 2024	2000 Subaru Legacy Outback Limited VIN # 4S3BE6867Y7204173	IX897834C	Inspection performed by Respondent. Throttle position, MAP, MAF and ignition timing advance readings unchanged when engine RPM was increased off idle to 1725.
January 27, 2024	2001 Honda Accord EX VIN # JHMCG66871C011925	IX897846C	Inspection performed by Respondent. Throttle position, MAP and ignition timing advance readings unchanged when engine RPM was increased off idle to 2125.
February 12, 2024	2000 Toyota Camry CE VIN # JT2BG22K7Y0392929	TS312012C	Inspection performed by Respondent. Throttle position, MAP and ignition timing advance readings unchanged when engine RPM was increased off idle to 2000.
February 26, 2024	2000 Lexus ES 300 VIN # JT8BF28GXY0266723	TS312035C	Inspection performed by Respondent. Throttle position, MAF and ignition timing advance readings unchanged when engine RPM was increased off idle to 1825.

May 27, 2024	2000 GMC New Sierra K1500 VIN # 1GTEK19VXYZ272311	TW070134C	Inspection performed by Respondent. Throttle position, MAP, MAF and ignition timing advance readings unchanged when engine RPM was increased off idle to 1775.
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FIRST CAUSE FOR DISCIPLINE

(Misleading Statements: Automotive Repair Dealer Registration)

34. Respondent has subjected his registration to discipline under BPC section 9884.7, subdivision (a)(1), in that Respondent made statements which were known to be untrue or misleading or, which by exercise of reasonable care should have been known to be untrue or misleading, when issuing electronic smog certificates of compliance for the vehicles set forth in Table 1, above, certifying that those vehicles were in compliance with applicable laws and regulations when, in fact, those vehicles had not been so inspected. Complainant refers to, and by this reference incorporates, the allegations contained in paragraphs 30 through 33, inclusive, as though set forth fully herein.

SECOND CAUSE FOR DISCIPLINE

(Fraud: Automotive Repair Dealer Registration)

35. Respondent has subjected his registration to discipline under BPC section 9884.7, subdivision (a)(4), in that Respondent committed acts that constitute fraud by issuing electronic smog certificates of compliance for the vehicles set forth in Table 1, above, without performing bona fide inspections of the emission control devices and systems on those vehicles, thereby depriving the People of the State of California of the protection afforded by the Motor Vehicle Inspection Program. Complainant refers to, and by this reference incorporates, the allegations contained in paragraphs 30 through 33, inclusive, as though set forth fully herein.

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THIRD CAUSE FOR DISCIPLINE

(Material Violation of Automotive Repair Act: Automotive Repair Dealer Registration)

36. Respondent has subjected his registration to discipline under BPC section 9884.7, subdivision (a)(6), in that Respondent failed in a “material respect to comply with the provisions of this chapter or regulations adopted pursuant to it” when issuing electronic smog certificates of compliance for the vehicles set forth in Table 1, above, without performing bona fide inspections of the emission control devices and systems on those vehicles, thereby depriving the People of the State of California of the protection afforded by the Motor Vehicle Inspection Program. Complainant refers to, and by this reference incorporates, the allegations contained in paragraphs 30 through 33, inclusive, as though set forth fully herein.

FOURTH CAUSE FOR DISCIPLINE

(Violation of the Motor Vehicle Inspection Program: Station License)

37. Respondent has subjected his station license to discipline under HSC section 44072.2, subdivision (a), in that, with respect to the vehicles set forth in Table 1, above, Respondent violated the following sections of the HSC:

- a. **Section 44012:** Respondent failed to ensure that the emission control tests were performed on those vehicles in accordance with procedures prescribed by the department.
- b. **Section 44015, subdivision (b):** Respondent issued electronic smog certificates of compliance without properly testing and inspecting the vehicles to determine if they were in compliance with section 44012 of the HSC.

FIFTH CAUSE FOR DISCIPLINE

**(Violations of Regulations Pursuant to the Motor Vehicle Inspection Program:
Station License)**

38. Respondent has subjected his station license to discipline under HSC section 44072.2, subdivision (c), in that, with respect to the vehicles set forth in Table 1, above, Respondent violated the following sections of title 16 of the CCR:

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a. **Section 3340.24, subdivision (c):** Respondent falsely or fraudulently issued electronic smog certificates of compliance without performing bona fide inspections of the emission control devices and systems on those vehicles as required by HSC section 44012.

b. **Section 3340.35, subdivision (c):** Respondent issued electronic smog certificates of compliance even though those vehicles had not been inspected in accordance with section 3340.42 of the HSC.

c. **Section 3340.42:** Respondent failed to conduct the required smog tests and inspections on those vehicles in accordance with the Bureau's specifications.

SIXTH CAUSE FOR DISCIPLINE

(Dishonesty, Fraud and/or Deceit: Station License)

39. Respondent has subjected his station license to discipline under HSC section 44072.2, subdivision (d), in conjunction with HSC section 44072.10, subdivision (c), in that, with respect to the vehicles set forth in Table 1, above, Respondent committed acts involving dishonesty, fraud, or deceit whereby another was injured by issuing electronic smog certificates of compliance for those vehicles without performing bona fide inspections and functional testing of the emission control devices and systems on those vehicles, thereby depriving the People of the State of California of the protection afforded by the Motor Vehicle Inspection Program. Complainant refers to, and by this reference incorporates, the allegations contained in paragraphs 30 through 33, inclusive, as though set forth fully herein.

SEVENTH CAUSE FOR DISCIPLINE

(Violation of the Motor Vehicle Inspection Program: Inspector License)

40. Respondent has subjected his smog check inspector license to discipline under HSC section 44072.2, subdivision (a), in that, with respect to the vehicles set forth in Table 1, above, Respondent violated the following sections of the HSC:

a. **Section 44012:** Respondent failed to ensure that the onboard diagnostic system tests were performed on those vehicles in accordance with procedures prescribed by the department.

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b. **Section 44015, subdivision (b):** Respondent issued electronic smog certificates of compliance without properly testing and inspecting the vehicles to determine if they were in compliance with section 44012 of the HSC.

c. **Section 44032:** Respondent failed to perform tests of the onboard diagnostic systems on those vehicles in accordance with section 44012 of the HSC.

d. **Section 44059:** Respondent willfully made false entries for the electronic smog certificates of compliance by certifying that those vehicles had been inspected as required when, in fact, they had not.

EIGHTH CAUSE FOR DISCIPLINE

(Violations of Regulations Pursuant to the Motor Vehicle Inspection Program:

Inspector License)

41. Respondent has subjected his smog check inspector license to discipline under HSC section 44072.2, subdivision (c), in that, with respect to the vehicles set forth in Table 1, above, Respondent violated the following sections of title 16 of the CCR:

a. **Section 3340.24, subdivision (c):** Respondent falsely or fraudulently issued electronic smog certificates of compliance without performing bona fide inspections and functional testing of the emission control devices and systems on those vehicles as required by HSC section 44012.

b. **Section 3340.30, subdivision (a):** Respondent failed to inspect and test those vehicles in accordance with HSC section 44012.

c. **Section 3340.35, subdivision (c):** Respondent issued electronic smog certificates of compliance even though those vehicles had not been inspected in accordance with section 3340.42 of the HSC.

d. **Section 3340.41, subdivision (c):** Respondent knowingly entered false information into the EIS about the vehicles being tested.

e. **Section 3340.42:** Respondent failed to conduct the required smog tests and inspections on those vehicles in accordance with the Bureau's specifications

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1 **NINTH CAUSE FOR DISCIPLINE**

2 **(Dishonesty, Fraud or Deceit: Inspector License)**

3 42. Respondent has subjected his smog check inspector license to discipline under HSC
4 section 44072.2, subdivision (d), in conjunction with HSC section 44072.10, subdivision (c), in
5 that, with respect to the vehicles set forth in Table 1, above, Respondent committed acts involving
6 dishonesty, fraud or deceit whereby another was injured by issuing electronic smog certificates of
7 compliance for those vehicles without performing bona fide inspections and functional testing of
8 the emission control devices and systems on those vehicles, thereby depriving the People of the
9 State of California of the protection afforded by the Motor Vehicle Inspection Program.
10 Complainant refers to, and by this reference incorporates, the allegations contained in paragraphs
11 30 through 33, inclusive, as though set forth fully herein.

12 **OTHER MATTERS**

13 43. Section 9884.7, subdivision (c), of the BPC states that “the director may suspend,
14 revoke, or place on probation the registration for all places of business operated in this state by an
15 automotive repair dealer upon a finding that the automotive repair dealer has, or is, engaged in a
16 course of repeated and willful violations of this chapter, or regulations adopted pursuant to.”

17 44. Section 44072.8 of the HSC states that when a license has been revoked or suspended
18 following a hearing, any additional license issued under the Motor Vehicle Inspection Program
19 (Health & Saf. Code Sec. 44000, et seq.) in the name of the licensee may be likewise revoked or
20 suspended by the director.

21 **PRAYER**

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

25 1. Revoking or suspending Automotive Repair Dealer Registration Number ARD
26 287850, issued to Oscar Antonio Flores, dba Daniel Smog Check Test Only;

27 2. Revoking or suspending Smog Check, Test-Only, Station License Number TC
28 287850, issued to Oscar Antonio Flores, dba Daniel Smog Check Test Only;

3. Revoking or suspending Smog Check Inspector License Number EO 640105, issued to Oscar Antonio Flores.

4. Revoking or suspending any and all additional Automotive Repair Dealer Registrations issued in the name of Oscar Antonio Flores pursuant to section 9884.7, subdivision (c), of the Business and Professions Code;

5. Revoking or suspending any and all licenses issued under the Motor Vehicle Inspection Program (Health & Saf. Code Sec. 44000, et seq.) in the name of Oscar Antonio Flores pursuant to section 44072.8 of the Health and Safety Code;

6. Ordering Oscar Antonio Flores 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 if placed on probation, the costs of probation monitoring; and

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

DATED: As of digital signature date

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

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