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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. 79/25-15181

13 **PEDRO ELI HERNANDEZ PEREZ, DBA**
14 **L & L SMOG CHECK**
9700 S. Figueroa St.
Los Angeles, CA 90003

ACCUSATION

15 **Automotive Repair Dealer Registration No.**
16 **ARD 302363**
Smog Check, Test Only, Station License No.
17 **TC 302363**

18 **and**

19 **CHARLENE PRINCESS GRAVES**
1341 W. 121 ST.
Los Angeles, CA 90044

20 **Smog Check Inspector No. EO 643447**

21 Respondents.
22

23 **PARTIES**

24
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.

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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 **STATUTORY PROVISIONS**

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

5 “(a) The director, where the automotive repair dealer cannot show there was a bona fide error,
6 may refuse to validate, or may invalidate temporarily or permanently, the registration of an
7 automotive repair dealer for any of the following acts or omissions related to the conduct of the
8 business of the automotive repair dealer, which are done by the automotive repair dealer or any
9 automotive technician, employee, partner, officer, or member of the automotive repair dealer.

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

13 (4) Any other conduct which constitutes fraud.

14

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

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18 10. Section 9889.3 of the BPC states, in pertinent part:

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

21 . . .

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

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

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

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

6 14. Section 44059 of the HSC provides:

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

11 15. Section 44072.2 of the HSC states, in pertinent part:

12 “The director may suspend, revoke, or take other disciplinary action against a license as
13 provided in this article if the licensee, or any partner, officer, or director thereof, does any of the
14 following:

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

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

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

21 16. Section 44072.8 of the HSC states that when a license has been revoked or suspended
22 following a hearing under this article, any additional license issued under this chapter in the name
23 of the licensee may be likewise revoked or suspended by the director.

24 17. Section 44072.10, subdivision (c), of the HSC provides in pertinent part that “[t]he
25 department shall revoke the license of any smog check technician or station licensee who fraudulently
26 certifies vehicles or participates in the fraudulent inspection of vehicles.”

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REGULATORY PROVISIONS

18. California Code of Regulations (“CCR”), title 16, section 3340.24, subdivision (c), states:

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

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

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

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

. . . .

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

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

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

COST RECOVERY

23. Section 125.3, subdivision (a), of the BPC provides, in pertinent part, that a Board “may request the administrative law judge to direct a licentiate found to have committed

1 violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the
2 investigation and enforcement of the case.”

3 **SUMMARY OF ON-BOARD DIAGNOSTIC SYSTEM (OIS) INSPECTIONS**

4 24. Beginning March 9, 2015, California’s Smog Check Program was updated to require
5 the use of an On-Board Diagnostic Inspection System (OIS). OIS is the Smog Check equipment
6 required in all areas of the State when inspecting most model-year 2000 and newer gasoline and
7 hybrid vehicles and most 1998 and newer diesel vehicles. The system consists of a certified Data
8 Acquisition Device (DAD), computer, bar code scanner, and printer. The DAD is an On Board
9 Diagnostic (OBD) scan tool that, when requested by the California OIS software, retrieves OBD
10 data from the vehicle. All OBD data that the vehicle indicates it supports is requested by the
11 California OIS software and will be retrieved.

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

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

26 27. Other data retrieved and recorded during an OIS smog check includes the number of
27 Parameter Identifications (PIDs), which refers to the number of specific data values that the
28 vehicle’s PCM uses related to emissions controls. The specific data values associated with a

1 vehicle's PIDs are also retrieved and recorded during an OIS smog check inspection. That data
2 include things such as the vehicle's engine speed, throttle position, manifold absolute pressure,
3 the engine's mass air flow, and ignition timing advance readings throughout an inspection.

4 Accordingly, the following types of data are recorded during an OIS smog check inspection:

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

20 **EXPLANATION OF CLEAN PLUGGING**

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

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

8 30. During normal engine operation at idle, engine speed is relatively steady around its
9 target idle speed. With the engine idling, the TPS is steady and at or near 0%. The MAP and/or
10 MAF readings are also steady. For the engine speed to increase, the throttle would have to be
11 opened to increase airflow through the engine. The engine's management systems supply fuel and
12 spark timing appropriate to any changes in throttle position and engine speed. An increase in
13 throttle, measured by the TPS, which increases engine RPM, would result in corresponding
14 increases in MAF as well as a change in MAP. Stated another way, any movement in the throttle
15 from the idle position will result in an increase of airflow through the engine with corresponding
16 increases RPM and/or MAF along with changes in MAP.

17 31. Clean plugging is apparent in cases where the data recorded during an OIS smog
18 check shows that the engine speed as measured in RPM increases during the test but the throttle
19 position remains unchanged, the mass air flow rate is unchanged, the manifold absolute pressure
20 is unchanged, and the ignition timing advance readings are unchanged. Because engine speed as
21 measured in RPM cannot increase without changes in throttle position, MAF, MAP and ignition
22 timing advance readings, test data in such cases demonstrates that a defeat device was used to
23 simulate engine speed (RPM) readings for a vehicle that was not actually tested.

24 **RESPONDENTS' FRAUDULENT SMOG INSPECTIONS**

25 32. A Bureau program representative analyzed specific OIS Test Data for inspections
26 performed at Respondent Hernandez's station between October 16, 2024 and May 9, 2025. The
27 investigation revealed that the data related to certain vehicles certified at Respondent Hernandez's
28 station by Respondent Graves contained a pattern of unmistakable discrepancies between the

1 information transmitted during the inspections and the recognized and scientifically established
2 characteristics of internal combustion engine operation.

3 33. Specifically, the Bureau program representative identified 10 instances in which the
4 throttle position, MAF and/or MAP readings fluctuated to unfeasible degrees while the vehicles
5 were held at steady idle and steady elevated engine speeds.¹ The data for the inspections at issue
6 also showed that, impossibly, throttle position readings for the vehicles had lower data points
7 during the elevated engine RPM stage of the inspections than at idle. Additionally, the data
8 showed implausible incidents of MAP readings at higher levels during the elevated engine RPM
9 stage of the inspections than at idle and MAF readings being lower during the elevated engine
10 RPM stage of the inspections than at idle. Such conditions would not have occurred if the DAD
11 had been connected to the vehicles that were purportedly being tested instead of a defeat device.

12 34. These documented discrepancies confirm that, in performing the inspections at issue,
13 Respondents engaged in the illegal activity of clean plugging in order to issue fraudulent
14 certificates of compliance for the vehicles. The following chart (“Table 1”) illustrates the
15 documented clean plugging activities by Respondents during the period reviewed.

16 **Table 1**

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Test Date	Vehicle Certified & License No./VIN	Certificate No.	Test Details
October 16, 2024	2004 Nissan Frontier King Cab XE VIN # 1N6DD26TX4C436861	TY989879C	Inspection performed by Respondent Graves. TPS and MAF fluctuate to unfeasible degrees while engine speed held steady at around 625 RPM; TPS and MAF fluctuate to unfeasible degrees while engine speed held steady at around 1950 RPM; at times during elevated engine RPM stage TPS and MAF had lower data points than at idle.

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28 ¹ Not all vehicles include both MAP and MAF parameters. Many vehicle manufacturers include only one of these parameters.

1 2 3 4	October 30, 2024	2003 BMW 745 LI VIN # WBAGN63423DR12351	TY989886C	Inspection performed by Respondent Graves. No change in TPS or MAF from when engine speed is held steady at around 700 RPM and then increased and held steady at around 1550 RPM.
5 6 7 8 9	February 4, 2025	2000 Ford Econoline E250 Van VIN # 1FTNE24LXYHB60052	UG998633C	Inspection performed by Respondent Graves. TPS and MAF fluctuate to unfeasible degrees while engine speed held steady at around 750 RPM; TPS and MAF fluctuate to unfeasible degrees while engine speed held steady at around 1800 RPM; at times during elevated engine RPM stage TPS and MAF had lower data points than at idle.
10 11 12 13 14 15 16 17 18	March 14, 2025	2000 Lincoln Town Car Cartier VIN # 1LNHM83W8YY824424	UG998649C	Inspection performed by Respondent Graves. TPS and MAF fluctuate to unfeasible degrees while engine speed held steady at around 800 RPM; TPS and MAF fluctuate to unfeasible degrees while engine speed held steady at around 1850 RPM; at times during elevated engine RPM stage TPS and MAF had lower data points than at idle.
19 20 21 22 23 24 25 26 27	April 14, 2025	2001 Chevrolet Silverado C1500 VIN # 1GCEC14W91Z286901	JD806671C	Inspection performed by Respondent Graves. TPS, MAP and MAF fluctuate to unfeasible degrees while engine speed held steady at around 650 RPM; TPS, MAP and MAF fluctuate to unfeasible degrees while engine speed held steady at around 1675 RPM; at times during elevated engine RPM stage TPS and MAF had lower data points than at idle while MAP had higher data points than at idle.

1 2 3 4 5 6 7 8	April 18, 2025	2001 Chevrolet Tahoe C1500 VIN # 1GNEC13T31R224425	JD806672C	Inspection performed by Respondent Graves. TPS, MAP and MAF fluctuate to unfeasible degrees while engine speed held steady at around 525 RPM; TPS, MAP and MAF fluctuate to unfeasible degrees while engine speed held steady at around 1750 RPM; at times during elevated engine RPM stage TPS and MAF had lower data points than at idle while MAP had higher data points than at idle.
9 10 11 12 13 14 15 16	April 23, 2025	2000 GMC New Sierra C1500 VIN # 1GTEC19T5YZ153884	JD806676C	Inspection performed by Respondent Graves. TPS, MAP and MAF fluctuate to unfeasible degrees while engine speed held steady at around 625 RPM; TPS, MAP and MAF fluctuate to unfeasible degrees while engine speed held steady at around 2000 RPM; at times during elevated engine RPM stage TPS and MAF had lower data points than at idle while MAP had higher data points than at idle.
17 18 19 20 21 22 23 24	April 26, 2025	2003 Ford F150 SVT Lightning VIN # 2FTRF07333CA71440	JD806678C	Inspection performed by Respondent Graves. TPS and MAF fluctuate to unfeasible degrees while engine speed held steady at around 700 RPM; TPS and MAF fluctuate to unfeasible degrees while engine speed held steady at around 2000 RPM; at times during elevated engine RPM stage TPS and MAF had lower data points of inspection than at idle.

1 2 3 4 5 6 7 8	May 9, 2025	2005 Chevrolet Silverado C1500 VIN # 1GCEC19V65Z151624	JD806681C	Inspection performed by Respondent Graves. TPS, MAP and MAF fluctuate to unfeasible degrees while engine speed held steady at around 575 RPM; TPS, MAP and MAF fluctuate to unfeasible degrees while engine speed held steady at around 1950 RPM; at times during elevated engine RPM stage TPS and MAF had lower data points than at idle while MAP had higher data points than at idle.
9 10 11 12 13 14 15 16	May 9, 2025	2006 Chevrolet Silverado C1500 VIN # 3GCEC14V16G191781	JD806683C	Inspection performed by Respondent Graves. TPS, MAP and MAF fluctuate to unfeasible degrees while engine speed held steady at around 600 RPM; TPS, MAP and MAF fluctuate to unfeasible degrees while engine speed held steady at around 1600 RPM; at times during elevated engine RPM stage TPS and MAF had lower data points than at idle while MAP had higher data points than at idle.

FIRST CAUSE FOR DISCIPLINE

(Misleading Statements – Automotive Repair Dealer Registration)

35. Respondent Hernandez has subjected his Automotive Repair Dealer 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, by engaging in clean plugging and issuing the 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 32 through 34, inclusive, as though set forth fully herein.

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1 **SECOND CAUSE FOR DISCIPLINE**

2 **(Fraud - Automotive Repair Dealer Registration)**

3 36. Respondent Hernandez has subjected his Automotive Repair Dealer Registration to
4 discipline under BPC section 9884.7, subdivision (a)(4), in that Respondent committed acts which
5 constitute fraud by issuing electronic smog certificates of compliance for the vehicles set forth in
6 Table 1, above, without performing bona fide inspections of the emission control devices and
7 systems on those vehicles, thereby depriving the People of the State of California of the
8 protection afforded by the Motor Vehicle Inspection Program. Complainant refers to, and by this
9 reference incorporates, the allegations contained in paragraphs 32 through 34, inclusive, as
10 though set forth fully herein.

11 **THIRD CAUSE FOR DISCIPLINE**

12 **(Material Violation of Automotive Repair Act
13 - Automotive Repair Dealer Registration)**

14 37. Respondent Hernandez has subjected his Automotive Repair Dealer Registration to
15 discipline under BPC section 9884.7, subdivision (a)(6), in that Respondent failed in a “material
16 respect to comply with the provisions of this chapter or regulations adopted pursuant to it” by
17 issuing electronic smog certificates of compliance for the vehicles set forth in Table 1, above,
18 without performing bona fide inspections of the emission control devices and systems on those
19 vehicles, thereby depriving the People of the State of California of the protection afforded by the
20 Motor Vehicle Inspection Program. Complainant refers to, and by this reference incorporates, the
21 allegations contained in paragraphs 32 through 34, inclusive, as though set forth fully herein.

22 **FOURTH CAUSE FOR DISCIPLINE**

23 **(Violation of the Motor Vehicle Inspection Program
24 - Automotive Repair Dealer Registration)**

25 38. Respondent Hernandez has subjected his Smog Check Test Only License to discipline
26 under HSC section 44072.2, subdivision (a), in that, with respect to the vehicles set forth in Table
27 1, above, Respondent violated the following sections of the HSC:

28 **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.

1 Complainant refers to, and by this reference incorporates, the allegations contained in paragraphs
2 32 through 34, inclusive, as though set forth fully herein.

3 **SEVENTH CAUSE FOR DISCIPLINE**

4 **(Violation of the Motor Vehicle Inspection Program –**
5 **Smog Check Inspector License)**

6 41. Respondent Graves has subjected her Smog Check Inspector License to discipline
7 under HSC section 44072.2, subdivision (a), in that, with respect to the vehicles set forth in Table
8 1, above, Respondent violated the following sections of the HSC:

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

11 b. **Section 44015, subdivision (b):** Respondent issued electronic smog certificates of
12 compliance to the vehicles set forth in Table 1 without properly testing and inspecting the
13 vehicles to determine if they were in compliance with section 44012 of the HSC.

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

16 d. **Section 44059:** Respondent willfully made false entries for the electronic smog
17 certificates of compliance by certifying that the vehicles set forth in Table 1 had been inspected as
18 required when, in fact, they had not.

19 **EIGHTH CAUSE FOR DISCIPLINE**

20 **(Violations of Regulations Pursuant to the Motor Vehicle Inspection Program**
21 **- Smog Check Inspector License)**

22 42. Respondent Graves has subjected her Smog Check Inspector License to discipline
23 under HSC section 44072.2, subdivision (c), in that, with respect to the vehicles set forth in Table
24 1, above, Respondent violated the following sections of title 16 of the CCR:

25 a. **Section 3340.24, subdivision (c):** Respondent falsely or fraudulently issued
26 electronic smog certificates of compliance to the vehicles set forth in Table 1 without performing
27 bona fide inspections and functional testing of the emission control devices and systems on those
28 vehicles as required by HSC section 44012.

1 (Health & Saf. Code Sec. 44000, et seq.) in the name of the licensee may be likewise revoked or
2 suspended by the director.

3 **PRAYER**

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

7 1. Revoking or suspending Automotive Repair Dealer Registration Number ARD
8 302363, issued to Pedro Eli Hernandez Perez;

9 2. Revoking or suspending Smog Check, Test-Only, Station License Number TC
10 302363, issued to Pedro Eli Hernandez Perez;

11 3. Revoking or suspending any and all additional Automotive Repair Dealer
12 Registrations issued in the name of Pedro Eli Hernandez Perez, pursuant to section 9884.7,
13 subdivision (c), of the Business and Professions Code;

14 4. Revoking or suspending any and all licenses issued under the Motor Vehicle
15 Inspection Program (Health & Saf. Code Sec. 44000, et seq.) in the name of Pedro Eli Hernandez
16 Perez pursuant to section 44072.8 of the Health and Safety Code;

17 5. Revoking or suspending Smog Check Inspector License Number EO 643447, issued
18 to Charlene Princess Graves;

19 6. Revoking or suspending any and all licenses issued under the Motor Vehicle
20 Inspection Program (Health & Saf. Code Sec. 44000, et seq.) in the name of Charlene Princess
21 Graves pursuant to section 44072.8 of the Health and Safety Code;

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7. Ordering Pedro Eli Hernandez Perez and Charlene Princess Graves 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,

8. 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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