

BAR case study

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Bureau of Automotive Repair

Business and Professions Code (BPC) section 9884.9(a)

- Provide a written estimate for parts and labor for a specific job
- Obtain customer authorization before starting work or accruing charges
- Obtain additional consent before performing any additional work or supplying parts that exceed the original estimate

California Code of Regulations¹ (CCR) section 3353

- Provide an estimate of parts and labor costs before obtaining authorization
- Obtain authorization before beginning work
- Identify used, rebuilt, or reconditioned parts
 - Otherwise, listed parts must be new

1 – All references are to Title 16

CCR section 3353.1

Customer authorization

- Obtain specific authorization before beginning any diagnosis or repair, including no-charge and warranty repairs
- Obtain authorization for estimates and revised work orders from the customer or their designee
- Authorization may be written, oral, or electronic

CCR section 3354

Additional authorization

- Additional work or charges
 - Describe the additional parts and labor
 - Provide their costs and a revised total
 - Obtain and record customer authorization before work begins or charges accrue
- Changes to approved repairs
 - Obtain customer authorization before changing the repair method or parts on an authorized, itemized work order
 - Record the written, oral, or electronic authorization

Automotive restoration transaction (1 of 6)

Disclaimer: The complaint was filed with BAR in January 2026, over 5 years after the parties agreed to the repair transaction. Required documentation is incomplete and a text message and email timeline received by BAR provide minimal clarity.

Restoration project background

- In February 2020, the consumer visited an ARD to view classic cars advertised online
- After seeing restoration projects (in progress), the consumer considered restoring a 1969 vehicle inherited from his father
- He researched the ARD and contacted them about the project

Automotive restoration transaction (2 of 6)

Initial scope and estimate

- Vehicle delivered around July 30, 2020
- Initial scope: front and rear suspension, four-wheel disc brakes, engine removal and resealing, upgraded cooling system, and new interior components
- Work began in late 2020, with completion promised by December 2022
- Initial estimate: \$29,400, provided by text on an undetermined date

Automotive restoration transaction (3 of 6)

Revised estimate and delays

- January 2021: additional work discussed; revised estimate of “70-80k” provided by text
- November 2022: ARD reported that work was underway
- February 2023: ARD texted “moving forward for you”
- March 2023: consumer requested an August 2023 completion date which was described as a possibility by the ARD
 - Bodywork, paint, and interior remained to be completed

Automotive restoration transaction (4 of 6)

Payments and remaining work

- 2021–2023: consumer paid \$73,000; payment dates are undetermined
- August 2023: bodywork was still underway; painting, reassembly, mechanical work, and interior work remained
- Consumer questioned the lack of progress; ARD cited more than 50 restoration projects in progress and limited staffing
- November 2023: ARD prepared an estimate labeled “invoice,” requesting \$35,827.10 to complete the remaining work
- December 2023: consumer requested a copy of the invoice

Automotive restoration transaction (5 of 6)

Continued delays and cost disputes

- January–June 2024: parties exchanged emails and texts about repair status and the remaining balance
- February 2024: ARD stated that bodywork was complete and the vehicle was being painted
- July 2024–January 2026: repairs continued amid disputes over progress and cost

Automotive restoration transaction (6 of 6)

Complaint and vehicle condition

- Consumer filed a complaint with BAR in January 2026
- BAR reviewed documents from both parties and photographed the vehicle
- Photographs showed primer only, significant unaddressed body rot around the wheel wells, and a completely disassembled interior
- BAR closed the complaint as unresolved in April 2026

Transaction document review (1 of 5)

Missing estimate and conflicting invoices

- Neither party provided BAR with a copy of an initial estimate that complies with BPC section 9884.9 and CCR section 3353
- Both parties provided differing copies of three invoices covering:
 - Suspension, steering, engine resealing, and interior installation
 - Bodywork, rear axle and transmission rebuilding, and engine removal
 - Remaining work to complete the restoration
- The first two invoices differed in numbers, dates, and amounts

Transaction document review (2 of 5)

First invoice: suspension, steering, brakes, cooling and engine components, interior, and installation labor

- Consumer's copy:
 - Invoice 3586, dated October 25, 2024
 - States that \$25,400 has been paid
- ARD's copy:
 - Invoice 3488, dated November 21, 2023
 - Identical repair description
 - Lists a \$51,465.96 balance due
 - Records phone approval of \$51,465.96 on April 29, 2021, at 4:50 p.m.

Transaction document review (3 of 5)

Second invoice: body disassembly and refinishing, rear frame rails, transmission and rear axle rebuilding, and engine/header removal

- Consumer's copy
 - Invoice 3585, dated October 25, 2024
 - States that \$47,600 has been paid
- ARD's copy
 - Invoice 3487, dated November 21, 2023
 - Identical repair description
 - Lists a \$64,600 total and \$22,489.02 balance due
 - Records phone approval of \$47,600 on April 29, 2021, at 4:50 p.m.

Transaction document review (4 of 5)

Third invoice: final completion costs

- Invoice 3489, dated November 21, 2023
- Described as the “FINAL cost to finish” the vehicle
- Covers remaining body parts, tires and wheels, an oil change, and alignment
- Lists a \$35,827.10 balance due
- Both parties provided identical copies

Transaction document review (5 of 5)

Consumer's invoice amounts

- Total amount invoiced: \$108,827.10
- Amount paid: \$73,000
- Remaining balance: \$35,827.10

ARD's invoice amounts

- Total of first two invoices: \$116,065.96
- Amount paid: \$73,000
- Remaining balance: \$43,065.96
- Amount requested: \$35,827.10
 - Note: It is unclear whether the ARD's final completion invoice is additional to the first two invoices

Conclusion

- Restoration projects are complex, with timelines that can be difficult to predict
- ARDs must comply with all applicable statutes and regulations, including:
 - Estimates: itemize parts and labor costs for each job
 - Authorization: promptly explain additional recommended repairs and costs and obtain consumer authorization
 - Invoices: list all installed parts and prices, and labor charges for each operation
- Frequent, open communication with the consumer is essential throughout these type of automotive repair transactions

Thank you

For comments and questions, please contact:

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