

1 KAMALA D. HARRIS  
Attorney General of California  
2 ARMANDO ZAMBRANO  
Supervising Deputy Attorney General  
3 ALVARO MEJIA  
Deputy Attorney General  
4 State Bar No. 216956  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 897-0083  
6 Facsimile: (213) 897-2804

7 *Attorneys for Complainant*

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

11 In the Matter of the Accusation Against:

Case No. 79/16-29

12 **BRIAN'S SMOG CHECK TEST ONLY;**  
13 **JUAN FRANCISCO CARRILLO, Owner**  
16506 S. Broadway St.  
14 Gardena, CA 90248

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

(Smog Check)

15 **Automotive Repair Dealer Registration**  
16 **No. ARD 273798, Smog Check Test Only**  
**Station License No. TC 273798,**

17 **LUIS HUMBERTO HUERTA,**  
18 **a.k.a., LUIS H. HUERTA HERNANDEZ**  
16506 S. Broadway St.  
Gardena, CA 90248

19 **Smog Check Inspector License No. EO 634509**  
20 **and Smog Check Repair Technician License No.**  
21 **EI 634509 (formerly Advanced Emission**  
**Specialist Technician License No. EA 634509)**

22 **and**

23 **EFRAIN VILLEGAS**  
1739 W. 155<sup>th</sup> St.  
24 Compton, CA 90220

25 **Smog Check Inspector License No. EO 636460**

26 Respondents.

27 Complainant alleges:

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1 **PARTIES**

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

4 **Brian’s Smog Check Test Only**

5 2. On or about July 29, 2013, the Director of Consumer Affairs (“Director”) issued  
6 Automotive Repair Dealer Registration Number ARD 273798 to Brian’s Smog Check Test Only;  
7 Juan Francisco Carrillo, Owner (“Respondent Brian’s Smog”). The Automotive Repair Dealer  
8 Registration was in full force and effect at all times relevant to the charges brought herein and  
9 will expire on July 31, 2016, unless renewed.

10 3. On or about August 19, 2013, the Director issued Smog Check Test Only Station  
11 License Number TC 273798 to Respondent Brian’s Smog. The Smog Check Test Only Station  
12 License was in full force and effect at all times relevant to the charges brought herein and will  
13 expire on July 31, 2016, unless renewed.

14 **Luis Humberto Huerta**

15 4. On or about July 18, 2012, the Director issued Advanced Emission Specialist  
16 Technician License Number EA 634509 to Luis Humberto Huerta, also known as Luis H. Huerta  
17 Hernandez (“Respondent Huerta”). Respondent Huerta’s advanced emission specialist technician  
18 license was due to expire on November 30, 2014, however was cancelled on November 20, 2014.  
19 Pursuant to California Code of Regulations, title 16, section 3340.28, subdivision (e), the license  
20 was renewed, pursuant to Respondent Huerta’s election, as Smog Check Inspector License No.  
21 EO 634509 and Smog Check Repair Technician License No. EI 634509, effective November 20,  
22 2014.<sup>1</sup> Respondent Huerta’s Smog Check Inspector and Smog Check Repair Technician licenses  
23 will expire on November 30, 2016, unless renewed.

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26 <sup>1</sup> Effective August 1, 2012, California Code of Regulations, title 16, sections 3340.28,  
27 3340.29, and 3340.30 were amended to implement a license restructure from the Advanced  
28 Emission Specialist Technician (EA) license and Basic Area (EB) Technician license to Smog  
Check Inspector (EO) license and/or Smog Check Repair Technician (EI) license.



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**STATUTORY PROVISIONS**

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

(a) The director, where the automotive repair dealer cannot show there was a bona fide error, may deny, suspend, revoke, or place on probation 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 that constitutes fraud.

(b) Except as provided for in subdivision (c), if an automotive repair dealer operates more than one place of business in this state, the director pursuant to subdivision (a) shall only suspend, revoke, or place on probation the registration of the specific place of business which has violated any of the provisions of this chapter. This violation, or action by the director, shall not affect in any manner the right of the automotive repair dealer to operate his or her other places of business.

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

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

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

14. Bus. & Prof. Code section 477, subdivision (b) states, in pertinent part, that a “license” includes “registration” and “certificate.”

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**HEALTH AND SAFETY CODES**

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

The director may suspend, revoke, or take other disciplinary action 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.

....

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

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

4 . . . .

5 (f) Aids or abets unlicensed persons to evade the provisions of this  
chapter . . .

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

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

11 . . . .

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

15 (1) Clean piping, as defined by the department.

16 . . . .

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

19 **REGULATORY PROVISIONS**

20 18. California Code of Regulations ("CCR"), title 16, section 3340.24, subdivision (c),  
21 states:

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

25 19. CCR, title 16, section 3340.30, subdivision (a), states that a licensed smog technician  
26 shall at all times "[i]nspect, test and repair vehicles, as applicable, in accordance with section  
27 44012 of the Health and Safety Code, section 44035 of the Health and Safety Code, and section  
28 3340.42 of this article."



1 **SURVEILLANCE OPERATION – MAY 15, 2014**

2 25. On or about May 15, 2014, the Bureau performed a surveillance operation at  
3 Respondent Brian’s Smog. The surveillance operation and information obtained from the  
4 Bureau’s Vehicle Information Database (“VID”) revealed that between 1152 hours and 1458  
5 hours, Respondent Brian’s Smog, through the actions of Respondent Huerta, performed two (2)  
6 smog inspections that resulted in the issuance of electronic certificates of compliance for vehicles  
7 1 and 2 set forth in Table 1, below, certifying that he had tested and inspected those vehicles and  
8 that the vehicles were in compliance with applicable laws and regulations. In fact, Respondent  
9 Huerta performed the smog inspections on vehicles number 1 and 2 set forth in Table 1, below,  
10 using the clean piping method.<sup>2</sup> Respondent Huerta used the tail pipe emissions of a 2001  
11 Dodge Caravan in order to issue the electronic certificate of compliance for vehicle number 1, a  
12 2003 Infiniti G35. Respondent Huerta used the tail pipe emissions of an unidentified red Ford  
13 Focus in order to issue the electronic certificate of compliance for vehicle number 2, a 1998  
14 Mazda 626. Respondent Juan Francisco Carrillo, owner of Brian’s Smog, was present during the  
15 fraudulent activity.

16 **SURVEILLANCE OPERATION – MAY 22, 2014**

17 26. On or about May 22, 2014, the Bureau performed a surveillance operation at Respondent  
18 Brian’s Smog. The surveillance operation and information obtained from the Bureau’s VID  
19 revealed that between 1719 hours and 1914 hours, Respondent Brian’s Smog, through the actions  
20 of Respondent Villegas, performed four (4) illegal smog inspections that resulted in the issuance  
21 of three (3) electronic certificates of compliance for vehicles 4, 5, and 6 set forth in Table 1,  
22 below, certifying that Respondent Villegas had tested and inspected those vehicles and that the  
23 vehicles were in compliance with applicable laws and regulations. In fact, Respondent Villegas  
24 performed the smog inspections on vehicles number 4, 5, and 6 set forth in Table 1, below, using  
25 the clean piping method. Respondent Villegas used the tail pipe emissions of a red Honda

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27 <sup>2</sup> “Clean piping” is sampling the (clean) tailpipe emissions and/or the RPM readings of  
28 another vehicle for the purpose of illegally issuing smog certifications to vehicles that are not in  
compliance or are not present in the smog check area during the time of the certification.

1 Accord to falsely fail vehicle number 3, a 1993 Geo Prizm. Respondent Villegas used the tail  
 2 pipe emissions of a silver Honda Accord in order to issue the electronic certificates of compliance  
 3 for vehicles number 4 and 5. Neither the certified 2000 Toyota Sienna nor the certified 2006  
 4 Mitsubishi Lancer Evolution were present in the test bay at the time of the smog inspections.  
 5 Respondent Villegas used the tail pipe emissions of a green Mitsubishi Eclipse in order to issue  
 6 the electronic certificate of compliance for vehicle number 6, a 1985 Winnebago motorhome.  
 7 Respondent Juan Francisco Carrillo, owner of Brian's Smog, was present during the fraudulent  
 8 activity, and participated in the fraudulent inspection of vehicle number 3.

9 **Table 1**

Illegal Smog Inspections & Certifications	Test Dates / Times	Vehicle in BAR 97 Data & License #	Vehicle Actually Tested	Certificate Issued	Details
1	05/15/2014 1152 hours to 1200 hours	2003 Infiniti G35, Lic. # 5AQT874	2001 Dodge Caravan, Lic. # 4TLZ599	YF618576C	The 2003 Infiniti G35 was not seen at the indicated inspection time. Respondent Huerta's technician license and access code were used to test a 2001 Dodge Caravan.
2	05/15/2014 1439 hours to 1458 hours	1998 Mazda 626	Red Ford Focus	YF618579C	Vehicle was present at the indicated inspection time. However, the Mazda 626 was pulled out during the inspection time and a red Ford Focus was pulled into the dynamometer bay and the emissions probe was inserted into the tailpipe of the red Ford Focus. The tailpipe emissions from the red Ford Focus was used in place of the tailpipe emissions from the Mazda 626.
3	05/22/2014 1719 hours to 1741 hours	1993 Geo Prizm, Lic. # 3ECS348	Red Honda Accord Coupe, Lic. # 6DBD518	None	False fail test. The 1993 Geo Prizm was not seen at the indicated inspection time. Respondent Villegas' technician license and access code were used to test a red Honda Accord Coupe.



Illegal Smog Inspections & Certifications	Test Dates / Times	Vehicle in BAR 97 Data & License #	Vehicle Actually Tested	Certificate Issued	Details
4	05/22/2014 1753 hours to 1804 hours	2000 Toyota Sienna, Lic. # 4MEZ548	Silver Honda Accord Sedan, Lic. # 4RQP157	YF735167C	The 2000 Toyota Sienna was not seen at the indicated inspection time. Respondent Villegas' technician license and access code were used to test a silver Honda Accord Sedan.
5	05/22/2014 1810 hours to 1826 hours	2006 Mitsubishi Lancer Evolution, Lic. # EVO92NV	Silver Honda Accord Sedan, Lic. # 4RQP157	YF735168C	The 2006 Mitsubishi Lancer Evolution was not seen at the indicated inspection time. Respondent Villegas' technician license and access code were used to test a silver Honda Accord Sedan.
6	05/22/2014 1902 hours to 1914 hours	1985 Winnebago Motorhome, Lic. # 1MWB346	Green Mitsubishi Eclipse	YF735169C	The 1985 Winnebago motorhome was not seen at the indicated inspection time. Respondent Villegas' technician license and access code were used to test a green Mitsubishi Eclipse.

**FIRST CAUSE FOR DISCIPLINE**

**(Misleading Statements)**

27. Respondent Brian's Smog has subjected his registration to discipline under Bus. & Prof. Code section 9884.7, subdivision (a)(1), in that on or about May 15, 2014 and May 22, 2014, Respondent made statements which he knew or which by exercise of reasonable care he should have known were untrue or misleading when Respondent Brian's Smog issued electronic 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, the vehicles had been clean piped.

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1 **SECOND CAUSE FOR DISCIPLINE**

2 **(Fraud)**

3 28. Respondent Brian's Smog has subjected his registration to discipline under Bus. &  
4 Prof. Code section 9884.7, subdivision (a)(4), in that on or about May 15, 2014 and May 22,  
5 2014, Respondent committed acts which constitute fraud by issuing electronic certificates of  
6 compliance for the vehicles set forth in Table 1, above, without performing bona fide inspections  
7 of the emission control devices and systems on those 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 **(Violation of the Motor Vehicle Inspection Program)**

11 29. Respondent Brian's Smog has subjected his station license to discipline under Health  
12 & Saf. Code section 44072.2, subdivision (a), in that on or about May 15, 2014 and May 22,  
13 2014, regarding the vehicles set forth in Table 1, above, Respondent violated sections of that  
14 Code, as follows:

15 a. **Section 44012, subdivision (a):** Respondent Brian's Smog failed to determine that  
16 all emission control devices and systems required by law were installed and functioning correctly  
17 in accordance with test procedures.

18 b. **Section 44012, subdivision (f):** Respondent Brian's Smog failed to perform  
19 emission control tests on those vehicles in accordance with procedures prescribed by the  
20 department.

21 c. **Section 44015, subdivision (b):** Respondent Brian's Smog issued electronic  
22 certificates of compliance without properly testing and inspecting the vehicles to determine if  
23 they were in compliance with section 44012 of that Code.

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

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1 **FOURTH CAUSE FOR DISCIPLINE**

2 **(Violations of Regulations Pursuant to the Motor Vehicle Inspection Program)**

3 30. Respondent Brian's Smog has subjected his station license to discipline under Health  
4 & Saf. Code section 44072.2, subdivision (c), in that on or about May 15, 2014 and May 22,  
5 2014, regarding the vehicles set forth in Table 1, above, Respondent violated sections of the  
6 California Code of Regulations, title 16, as follows:

7 a. **Section 3340.24, subdivision (c):** Respondent Brian's Smog falsely or fraudulently  
8 issued electronic certificates of compliance without performing bona fide inspections of the  
9 emission control devices and systems on those vehicles as required by Health & Saf. Code section  
10 44012.

11 b. **Section 3340.35, subdivision (c):** Respondent Brian's Smog issued electronic  
12 certificates of compliance even though those vehicles had not been inspected in accordance with  
13 section 3340.42 of that Code.

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

16 **FIFTH CAUSE FOR DISCIPLINE**

17 **(Dishonesty, Fraud or Deceit)**

18 31. Respondent Brian's Smog subjected his station license to discipline under Health &  
19 Saf. Code section 44072.2, subdivision (d), in that on or about May 15, 2014 and May 22, 2014,  
20 regarding the vehicles set forth in Table 1, above, Respondent committed acts involving  
21 dishonesty, fraud or deceit whereby another was injured by issuing electronic certificates of  
22 compliance for those vehicles without performing bona fide inspections of the emission control  
23 devices and systems on those vehicles, thereby depriving the People of the State of California of  
24 the protection afforded by the Motor Vehicle Inspection Program.

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1 **SIXTH CAUSE FOR DISCIPLINE**

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

3 32. Respondent Huerta has subjected his Smog Check Inspector and Smog Check Repair  
4 Technician licenses to discipline under Health & Saf. Code section 44072.2, subdivision (a), in  
5 that on or about May 15, 2014, regarding the vehicles set forth in Table 1, he violated sections of  
6 that Code, as follows:

7 a. **Section 44012, subdivision (a):** Respondent Huerta failed to determine that all  
8 emission control devices and systems required by law were installed and functioning correctly in  
9 accordance with test procedures.

10 b. **Section 44012, subdivision (f):** Respondent Huerta failed to perform emission  
11 control tests on those vehicles in accordance with procedures prescribed by the department.

12 c. **Section 44032:** Respondent Huerta failed to perform tests of the emission control  
13 devices and systems on those vehicles in accordance with section 44012 of that Code, in that  
14 those vehicles had been clean piped.

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

18 **SEVENTH CAUSE FOR DISCIPLINE**

19 **(Violations of Regulations Pursuant to the Motor Vehicle Inspection Program)**

20 33. Respondent Huerta has subjected his Smog Check Inspector and Smog Check Repair  
21 Technician licenses to discipline under Health & Saf. Code section 44072.2, subdivision (c), in  
22 that on or about May 15, 2014, regarding the vehicles set forth in Table 1, he violated sections of  
23 the California Code of Regulations, title 16, as follows:

24 a. **Section 3340.24, subdivision (c):** Respondent Huerta falsely or fraudulently issued  
25 electronic certificates of compliance without performing bona fide inspections of the emission  
26 control devices and systems on those vehicles as required by Health & Saf. Code section 44012.

27 b. **Section 3340.30, subdivision (a):** Respondent Huerta failed to inspect and test those  
28 vehicles in accordance with Health & Saf. Code section 44012.

1 c. **Section 3340.41, subdivision (c):** Respondent Huerta entered false information into  
2 the EIS for the electronic certificates of compliance by entering vehicle emission control  
3 information for vehicles other than the vehicles being certified.

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

6 **EIGHTH CAUSE FOR DISCIPLINE**

7 **(Dishonesty, Fraud or Deceit)**

8 34. Respondent Huerta has subjected his Smog Check Inspector and Smog Check Repair  
9 Technician licenses to discipline under Health & Saf. Code section 44072.2, subdivision (d), in  
10 that on or about May 15, 2014, he committed acts involving dishonesty, fraud or deceit whereby  
11 another was injured by issuing electronic certificates of compliance for the vehicles set forth in  
12 Table 1, above, without performing bona fide inspections of the emission control devices and  
13 systems on those vehicles, thereby depriving the People of the State of California of the  
14 protection afforded by the Motor Vehicle Inspection Program.

15 **NINTH CAUSE FOR DISCIPLINE**

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

17 35. Respondent Villegas has subjected his Smog Check Inspector license to discipline  
18 under Health & Saf. Code section 44072.2, subdivision (a), in that on or about May 22, 2014,  
19 regarding the vehicles set forth in Table 1, he violated sections of that Code, as follows:

20 a. **Section 44012, subdivision (a):** Respondent Villegas failed to determine that all  
21 emission control devices and systems required by law were installed and functioning correctly in  
22 accordance with test procedures.

23 b. **Section 44012, subdivision (f):** Respondent Villegas failed to perform emission  
24 control tests on those vehicles in accordance with procedures prescribed by the department.

25 c. **Section 44032:** Respondent Villegas failed to perform tests of the emission control  
26 devices and systems on those vehicles in accordance with section 44012 of that Code, in that  
27 those vehicles had been clean piped.

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**OTHER MATTERS**

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2       38. Under Code section 9884.7, subdivision (c), the director may invalidate temporarily  
3 or permanently or refuse to validate, the registrations for all places of business operated in this  
4 state by Juan Francisco Carrillo, including, but not limited to Brian's Smog (ARD 273798) upon  
5 a finding that he 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       39. Under Health and Safety Code section 44072.8, if Station License No. TC 273798,  
8 issued to Juan Francisco Carrillo is revoked or suspended, any additional license issued under this  
9 chapter in the name of said licensee, including, but not limited to Brian's Smog (TC 273798) may  
10 be likewise revoked or suspended by the director.

11       40. Under Health and Safety Code section 44072.8, if Respondent Huerta's Smog Check  
12 Inspector License No. EO 634509 and/or Smog Check Repair Technician License No. EI 634509  
13 are revoked or suspended, any additional license issued under this chapter in the name of said  
14 licensee may be likewise revoked or suspended by the director.

15       41. Under Health and Safety Code section 44072.8, if Respondent Villegas' Smog Check  
16 Inspector License No. EO 636460 is revoked or suspended, any additional license issued under  
17 this chapter in the name of said licensee may be likewise revoked or suspended by the director.

**PRAAYER**

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

21       1. Revoking or suspending Automotive Repair Dealer Registration No. ARD 273798,  
22 issued to Brian's Smog Check Test Only; Juan Francisco Carrillo, Owner;

23       2. Revoking or suspending any other automotive repair dealer registration issued in the  
24 name of Juan Francisco Carrillo;

25       3. Revoking or suspending Smog Check Test Only Station License No. TC 273798,  
26 issued to Brian's Smog Check Test Only; Juan Francisco Carrillo, Owner;

27       4. Revoking or suspending any additional license issued under this chapter in the name  
28 of Juan Francisco Carrillo;

1           5.     Revoking or suspending Smog Check Inspector License No. EO 634509 issued to  
2 Luis Humberto Huerta, also known as Luis H. Huerta Hernandez;

3           6.     Revoking or suspending Smog Check Repair Technician License No. EI 634509  
4 issued to Luis Humberto Huerta, also known as Luis H. Huerta Hernandez;

5           7.     Revoking or suspending any additional license issued under this chapter in the name  
6 of Luis Humberto Huerta, also known as Luis H. Huerta Hernandez;

7           8.     Revoking or suspending Smog Check Inspector License No. EO 636460 issued to  
8 Efrain Villegas;

9           9.     Revoking or suspending any additional license issued under this chapter in the name  
10 of Efrain Villegas;

11          10.    Ordering Juan Francisco Carrillo, Luis Humberto Huerta, and Efrain Villegas to pay  
12 the Bureau of Automotive Repair the reasonable costs of the investigation and enforcement of  
13 this case, pursuant to Business and Professions Code section 125.3; and

14          11.    Taking such other and further action as deemed necessary and proper.

15  
16 DATED:

September 24, 2015



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