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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:
12 **STEVES AUTO SERVICE INC.,**
13 **SIMIN GHAREBAGHI, President**
14 **MOHAMAD SEPIDEHDAN, Secretary**
15 **SOHIL SEPIDEHDAM, Treasurer**
16 **4160 Saviers Rd.**
Oxnard, CA 93033

17 **Automotive Repair Dealer Registration No.**
ARD 194906
18 **Smog Check Station License No. RC 194906**
Brake Station License No. BS 194906; Lamp
19 **Station License No. LS 194906**

20 **and**

21 **MOHAMAD SEPIDEHDAM**
4160 Saviers Rd.
22 **Oxnard, CA 93033**
Smog Check Repair License No. EO 026455;
23 **Smog Check Repair Technician License No.**
EI 026455

24 **SOHIL SEPIDEHDAM**
25 **4160 Saviers Rd.**
Oxnard, CA 93033
26 **Smog Check Inspector License No. EO 632150**
27 **Smog Check Repair Technician License No.**
EI 632150
28

Case No. **79/16-849**

OAH No.

A C C U S A T I O N

1 **and**

2
3
4 **LUZ FERNANDO BALTAZAR RAMIREZ**
5 **826 Lemar Ave.**
6 **Oxnard, CA 93036**
7 **Smog Check Inspector License No. EO 637415**

8 Respondents.

9 Complainant alleges:

10 **PARTIES**

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

13 2. In 1997, the Bureau of Automotive Repair issued Automotive Repair Dealer
14 Registration Number ARD 194906 to Steves Auto Service Inc., Simin Gharebaghi, President;
15 Mohamad Sepidehdam, Secretary; and Sohil Sepidehdam, Treasurer (Respondents). The
16 Automotive Repair Dealer Registration was in full force and effect at all times relevant to the
17 charges brought herein and will expire on June 30, 2017, unless renewed.

18 3. On or about June 23, 1997, the Bureau of Automotive Repair issued Smog Check
19 Station License Number RC 194906 to Steves Auto Service Inc., Simin Gharebaghi, President;
20 Mohamad Sepidehdam, Secretary; and Sohil Sepidehdam, Treasurer (Respondents). The Smog
21 Check Station License was in full force and effect at all times relevant to the charges brought
22 herein and will expire on June 30, 2017, unless renewed.

23 4. On or about March 25, 2013, the Bureau of Automotive Repair issued STAR Station
24 Certification to Steves Auto Service Inc., Simin Gharebaghi, President; Mohamad Sepidehdam,
25 Secretary; and Sohil Sepidehdam, Treasurer (Respondents). The STAR Station was in full force
26 and effect at all times relevant to the charges brought herein and will remain active unless the
27
28

1 Automotive Repair Dealer Registration and/or Smog Check Station license is revoked, cancelled,
2 licenses become delinquent or certification is invalidated.

3 5. In 2002, the Bureau of Automotive Repair issued Advanced Emission Specialist
4 Technician license no. EA 26455 to Mohamad Sepidehdam. The license was cancelled on
5 March 19, 2014. Said license was renewed pursuant to the licensee's election as Smog Check
6 Inspector (EO) license no. 26455 and Smog Check Repair Technician (EI) license no. 26455,
7 effective March 19, 2014. The Smog Check Inspector license and Smog Check Repair
8 Technician license will expire on June 30, 2018, unless renewed.

9 6. On June 7, 2010, the Bureau of Automotive Repair issued Advanced Emission
10 Specialist Technician license no. EA 632150 to Sohil Sepidehdam. The license was cancelled
11 effective December 30, 2013. The Smog Check Inspector license and Smog Check Repair
12 Technician license will expire on December 31, 2017, unless renewed.

13 7. On October 16, 2014, the Bureau of Automotive Repair issued Smog Check Inspector
14 (EO) License Number 637415 to Luz Fernando Baltazar Ramirez. The Smog Check Inspector's
15 License was in full force and effect at all times relevant to the charges brought herein and will
16 expire on May 31, 2018, unless renewed.

17 JURISDICTION

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

22 9. Section 9889.1 of the BPC provides, in pertinent part, that the Director may suspend
23 or revoke any license issued under Articles 5 and 6 (commencing with section 9887.1) of the
24 Automotive Repair Act.

25 10. Section 9889.7 of the BPC provides, in pertinent part, that the expiration or
26 suspension of a license by operation of law or by order or decision of the Director or a court of
27 law, or the voluntary surrender of a license shall not deprive the Director of jurisdiction to
28 proceed with any disciplinary proceedings.

1 11. Health and Safety Code (“HSC”) section 44002 provides, in pertinent part, that the
2 Director has all the powers and authority granted under the Automotive Repair Act for enforcing
3 the Motor Vehicle Inspection Program.

4 12. Section 44072.6 of the HSC provides, in pertinent part, that the expiration or
5 suspension of a license by operation of law, or by order or decision of the Director of Consumer
6 Affairs, or a court of law, or the voluntary surrender of the license shall not deprive the Director
7 of jurisdiction to proceed with disciplinary action.

8 **STATUTORY PROVISIONS**

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

10 “(a) The director, where the automotive repair dealer cannot show there was a bona fide
11 error, may refuse to validate, or may invalidate temporarily or permanently, the registration of an
12 automotive repair dealer for any of the following acts or omissions related to the conduct of the
13 business of the automotive repair dealer, which are done by the automotive repair dealer or any

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

17 (4) Any other conduct which constitutes fraud.

18

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

21 14. Section 9889.9 of the BPC states that “[w]hen any license has been revoked or
22 suspended following a hearing under the provisions of this article [Article 7 (commencing with
23 section 9889.1) of the Automotive Repair Act], any additional license issued under Articles 5 and
24 6 of this chapter in the name of the licensee may be likewise revoked or suspended by the
25 director.”

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

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

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

8 18. Section 44059 of the HSC provides:

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

13 19. Section 44072.2 of the HSC states, in pertinent part:

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

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

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

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

23 “(e) Has misrepresented a material fact in obtaining a license.

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

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

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1 **REGULATORY PROVISIONS**

2 21. California Code of Regulations, title 16, section 3340.15, subdivision (b), states, in
3 pertinent part, that “[a] licensed inspector and/or repair technician shall be present during all
4 hours the station is open for the business.”

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

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

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

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

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

20 **COST RECOVERY**

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

25 **DATA ANALYSIS OF CLEAN PLUGGING ACTIVITIES**

26 27. On March 9, 2015, the Bureau implemented a policy change requiring the use of
27 an On-Board Diagnostic Inspection System (OIS) in testing of 2000 model year and newer gas
28 powered vehicles 14,000 Gross Vehicle Weight Rating (GVW) and under, and 1998 and newer

1 diesel powered vehicles 14,000 GVW and under. The OIS Test Data provides the Bureau with a
2 wealth of electronic information about the vehicle that is connected to the system, making the
3 OIS a vital tool in the Bureau's ongoing efforts to root out fraudulent conduct in the smog
4 inspection business. For example, among other things, the OIS Bureau Test Data reveals any
5 differences between the Vehicle Identification Numbers (VIN) entered into the emission
6 inspection system (i.e., "BAR 97") by the smog technician at the time of the inspection and the
7 VIN electronically programmed into the vehicle by the manufacturer ("eVIN"). Such
8 discrepancies between the VIN entered by the smog technician and the eVIN programmed into
9 the vehicle by the manufacturer are indicative of illegal "clean plugging".¹

10 VID DATA REVIEW

11 28. In January 2016, Bureau representative Christopher Dunne conducted an
12 investigation in which he reviewed On-board Diagnostic Inspection System (OIS) test data for
13 Steves Auto Service Inc. from September 27, 2014 through October 23, 2015. The test data
14 revealed anomalies consistent with fraudulent Smog Check activities. A further in depth analysis
15 of OIS test data revealed that there were a total of five (5) vehicles of various years, make and
16 models that were issued five (5) fraudulent Certificates of Compliance by using a surrogate
17 vehicle's properly functioning On Board Diagnostic, Generation II, (OB II) system or other
18 source to generate passing diagnostic readings for the purpose of fraudulently issuing Smog
19 Check certificates to vehicles that are not in smog compliance and/or not present for testing. The
20 OIS test data from these five (5) vehicles were compared to the OIS test data of similar vehicles
21 of the same year, make and model that received passing Smog Check inspections and received
22 smog certificates. The data comparison showed multiple discrepancies with five (5) vehicles that
23 were all certified with the e-VIN missing, incorrect vehicle communication protocols² and

24 ¹ Clean plugging refers to the use of another vehicle's properly functioning On Board Diagnostic,
25 generation II, (OBD II) system, or another source, to generate passing diagnostic readings for the purpose of issuing
26 fraudulent smog Certificates of Compliance to vehicles that are not in smog compliance and/or not present for
testing.

27 ² Protocol is simply the language used to communicate with a vehicle's computer(s). Protocol is a
28 communication interface. This automated determination of the communication interface, or protocol, is built into the
Data Acquisition Device (DAD) unit. This automatic function identifies five (5) protocols used by vehicles
manufactured and sold in the United States that are subject to the Smog Check program.

1 incorrect Parameter Identification (PID) count, which confirms the vehicles receiving smog
 2 certificates were fraudulently tested during the smog inspection using the clean plugging method³.
 3 Table 1 illustrates the clean plugging activities at Respondent Steves Auto Service Inc. between
 4 September 27, 2014 through October 23, 2015.

5 **TABLE 1**

6 Test Date and Time (military)	7 Vehicle Certified & License No.	8 Certificate No.	9 Technician License No.	10 OIS Test Data Details
11 09/27/14 12 Start at 0847	13 2003 BMW 325i 14 VIN 15 #WBAAZ33453KP80268	16 PK879103C	17 EO026455 18 (Respondent 19 M. 20 Sepidehdam)	21 Comm. Protocol: 22 KWPF8FEF 23 (expected I914) 24 25 PID Count: 22 26 (expected 22/1) 27 28 e-VIN-Missing
11 11/13/14 12 Start at 1549	13 2000 Ford Explorer XLS 14 VIN # 15 1FMZU72E2YZA98724	16 PM479602C	17 EO637415 18 (Respondent 19 Ramirez)	20 Comm. Protocol: 21 I9140808 (expected 22 JPWM) 23 24 PID Count: 18 25 (expected 20) 26 27 e-VIN-Missing
11 12/10/14 12 Start at 0906	13 2004 Ford F150 14 VIN # 15 1FTPW14514KC42525	16 YN027565C	17 EO026455 18 (Respondent 19 M. 20 Sepidehdam) 21)	22 Comm. Protocol: 23 I9140808 (expected 24 ICAN11bt5) 25 26 PID Count: 17 27 (expected 27) 28 e-VIN-Missing
11 03/03/15 12 Start at 0946	13 2008 Toyota Sequoia 14 SR5 15 VIN # 16 5TDZY64A18S006033	17 PQ043192C	18 EO632150 19 (Respondent 20 S. 21 Sepidehdam)	22 Comm. Protocol: 23 I9140808 (expected 24 ICAN11bt5) 25 26 PID Count: 17 27 (expected 47) 28

26 ³ Clean plugging is the use of the OBD II readiness monitor status and stored fault code (trouble code)
 27 status of a passing vehicle for the purpose of illegally issuing a smog certificate to another vehicle that is not in
 28 compliance due to a failure to complete the minimum number of self tests, known as monitors, or due to the presence
 of a stored fault code that indicates an emission control system or component failure.

1				e-VIN-Missing
2	10/23/15 Start at 1220	2002 Jeep Grand Cherokee Laredo	PY635454C	EO632150
3		VIN #		(Respondent S. Sepidehdam)
4		1J4GW48N32C278343		Comm. Protocol: I9140808 (expected JVPW)
5				PID Count: 20 (expected 20/3)
6				e-VIN-Missing

7 **FIRST CAUSE FOR DISCIPLINE**

8 **(Untrue or Misleading Statements)**

9 29. Respondent Steves Auto Service's Inc., registration is subject to discipline pursuant
10 to Code section 9884.7, subdivision (a)(1), in that between September 27, 2014 through October
11 23, 2015, Respondent made or authorized statements which they knew or in the exercise of
12 reasonable care should have known to be untrue or misleading, as follows: Respondent Steves
13 Auto Service Inc., certified that vehicles 1 through 5, set forth above in Table 1, had passed
14 inspection and were in compliance with applicable laws and regulations. In fact, Respondent
15 conducted the inspections on the vehicles using the clean plugging method by substituting or
16 using different vehicles during the OBD II functional tests in order to issue smog certificates of
17 compliance for the 5 vehicles, and did not test or inspect the 5 vehicles as required by Health and
18 Safety Code section 44012.

19 **SECOND CAUSE FOR DISCIPLINE**

20 **(Fraud)**

21 30. Respondent Steves Auto Service 's Inc., registration is subject to discipline pursuant
22 to Code section 9884.7, subdivision (a)(4), in that between September 27, 2014 through October
23 23, 2015, Respondent committed acts which constitute fraud by issuing electronic certificates of
24 compliance for vehicles 1 through 5, set forth above in Table 1, without performing bona fide
25 inspections of the emission control devices and systems on those vehicles, thereby depriving the
26 People of the State of California of the protection afforded by the Motor Vehicle Inspection
27 Program.

1 **THIRD CAUSE FOR DISCIPLINE**

2 **(Failure to Comply with the Motor Vehicle Inspection Program)**

3 31. Respondent Steves Auto Service 's Inc., station license is subject to discipline
4 pursuant to Health and Safety Code section 44072.2, subdivision (a), in that between September
5 27, 2014 through October 23, 2015, regarding vehicles 1 through 5, set forth above in Table 1,
6 Respondent failed to comply with the following sections of that Code:

7 a. Section **44012**: Respondent Steves Auto Service Inc., failed to ensure that the emission
8 control tests were performed on vehicles 1 through 5, in accordance with procedures prescribed
9 by the department.

10 b. Section **44015**: Respondent Steves Auto Service Inc., issued electronic certificates of
11 compliance for vehicles 1 through 5, without ensuring that the vehicles were properly tested and
12 inspected to determine if they were in compliance with Health and Safety Code section 44012.

13 c. **Section 44059**: Respondent Steves Auto Service Inc., willfully made false entries for
14 the electronic certificates of compliance by certifying that those vehicles had been inspected as
15 required when, in fact, they had not.

16 **FOURTH CAUSE FOR DISCIPLINE**

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

19 32. Respondent Steves Auto Service's Inc., station license is subject to discipline
20 pursuant to Health and Safety Code section 44072.2, subdivision (c), in that between September
21 27, 2014 through October 23, 2015, regarding vehicles 1 through 5, set forth above in Table 1,
22 Respondent failed to comply with provisions of California Code of Regulations, title 16, as
23 follows:

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

1 b. Section 3340.35, subdivision (c): Respondent Steves Auto Service Inc., issued
2 electronic certificates of compliance even though those vehicles had not been inspected in
3 accordance with section 3340.42 of that Code.

4 c. Section 3340.42: Respondent Steves Auto Service Inc., failed to conduct the required
5 smog tests and inspections on those vehicles in accordance with the Bureau's specifications.

6 **FIFTH CAUSE FOR DISCIPLINE**

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

8 33. Respondent Steves Auto Service's Inc., station license is subject to discipline
9 pursuant to Health and Safety Code section 44072.2, subdivision (d), in that between September
10 27, 2014 and October 23, 2015, regarding vehicles 1 through 5, set forth above in Table 1,
11 Respondent committed acts involving dishonesty, fraud or deceit whereby another was injured by
12 issuing electronic certificates of compliance for those vehicles without performing bona fide
13 inspections of the emission control devices and systems on the vehicles, thereby depriving the
14 People of the State of California of the protection afforded by the Motor Vehicle Inspection
15 Program.

16 **SIXTH CAUSE FOR DISCIPLINE**

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

18 34. Respondents M. Sepidehdam, S. Sepidehdam and L. Ramirez' Inspector Licenses are
19 subject to discipline pursuant to Health and Safety Code section 44072.2, subdivision (a), in that
20 between September 27, 2014 and October 23, 2015, regarding vehicles 1 through 5, set forth
21 above in Table 1, they each failed to comply with section 44012 of that Code in a material
22 respect, as follows: Respondents failed to perform the emission control tests on those vehicles in
23 accordance with procedures prescribed by the department.

24 **SEVENTH CAUSE FOR DISCIPLINE**

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

27 35. Respondents M. Sepidehdam, S. Sepidehdam and L. Ramirez' Inspector Licenses are
28 subject to discipline pursuant to Health and Safety Code section 44072.2, subdivision (c), in that

1 between September 27, 2014 to October 23, 2015, regarding vehicles 1 through 5, set forth above
2 in Table 1, they each failed to comply with provisions of California Code of Regulations, title 16,
3 as follows:

4 a. Section **3340.24, subdivision (c)**: Respondents falsely or fraudulently issued electronic
5 certificates of compliance without performing bona fide inspections of the emission control
6 devices and systems on those vehicles as required by Health and Safety Code section 44012.

7 b. Section **3340.30 subdivision (a)**: Respondents failed to inspect and test those vehicles in
8 accordance with Health and Safety Code sections 44012.

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

11 **EIGHTH CAUSE FOR DISCIPLINE**

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

13 36. Respondents M. Sepidehdam, S. Sepidehdam and L. Ramirez' Inspector Licenses are
14 subject to discipline pursuant to Health and Safety Code section 44072.2, subdivision (d), in that
15 between September 27, 2014 and October 23, 2015 , regarding vehicles 1 through 5, set forth
16 above in Table 1, as designated to each, they committed acts involving dishonesty, fraud or deceit
17 whereby another was injured by issuing electronic certificates of compliance without performing
18 bona fide inspections of the emission control devices and systems on those vehicles, thereby
19 depriving the People of the State of California of the protection afforded by the Motor Vehicle
20 Inspection Program.

21 **OTHER MATTERS**

22 37. Pursuant to Code section 9884.7, subdivision (c), the director may suspend, revoke,
23 or place on probation the registrations for all places of business operated in this state by Simin
24 Gharebaghi, Mohamad Sepidehdam, or Sohil Sepidehdam, upon a finding that they or each of
25 them has, or is, engaged in a course of repeated and willful violation of the laws and regulations
26 pertaining to an automotive repair dealer.

27 38. Pursuant to Health and Safety Code section 44072.8, if Smog Check Test Only
28 Station License Number RC 194906, issued to Steves Auto Service Inc., Simin Gharebaghi,

1 President; Mohamad Sepidehdam, Secretary; and Sohil Sepidehdam, Treasurer, is revoked or
2 suspended, any additional license issued under this chapter in the name of said licensee may be
3 likewise revoked or suspended by the director.

4 39. Pursuant to Health and Safety Code section 44072.8, if Smog Check Inspector
5 License Nos. . EO 26455, issued to Mohamad Sepidehdam; EO 632150 issued to Sohil
6 Sepidehdam or EO 637415 issued to Luz Fernando Baltazar Ramirez are each or any of them are
7 revoked or suspended, any additional license issued under this chapter in the name of said
8 licensee(s) may be likewise revoked or suspended by the director.

9 **PRAYER**

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

12 1. Revoking or suspending Automotive Repair Dealer Registration Number ARD
13 194906, issued to Steves Auto Service Inc., Simin Gharebaghi, Mohamad Sepidehdam, Sohil
14 Sepidehdam;

15 2. Revoking or suspending any other automotive repair dealer registration issued to
16 Simin Gharebaghi, Mohamad Spediehdam, or Sohil Sepidehdam.

17 3 Revoking or suspending Smog Check Station License Number RC 194906, issued to
18 Steves Auto Service Inc., Simin Gharebaghi, Mohamad Sepidehdam, Sohil Sepidehdam;

19 4. Revoking or suspending Smog Check Inspector License Number EO 26455, issued to
20 Mohamad S Sepidehdam;

21 5. Revoking or suspending Smog Check Repair Technician License Number EI 26455,
22 issued to Mohamad S Sepidehdam;

23 6. Revoking or suspending Smog Check Inspector License Number EO 632150 issued to
24 Sohil Sepidehdam;

25 7. Revoking or suspended Smog Check Repair Technician License Number EI 632150
26 issued to Sohil Sepidehdam;

27 8. Revoking or suspending Smog Check Inspector License Number EO 637415 issued
28 to Luz Fernando Baltazar Ramirez;

