BEFORE THE DIRECTOR OF THE

DEPARTMENT OF CONSUMER AFFAIRS

BUREAU OF AUTOMOTIVE REPAIR

STATE OF CALIFORNIA

In the Matter of Accusation Against:

VAROOJ AGHAZARIAN- PRESIDENT/SECRETARY/TREASURER-VAROOJ & SONS INC. dba AYA SMOG AND AUTO REPAIR

14152 Oxnard St.

Van Nuys, CA 91401

Automotive Repair Dealer Registration No. ARD 232315

Smog Check Station License No. RC 232315

Brake Station License No. BS 232315, Class C

Lamp Station License No. LS 232315, Class A

and

VAROOJ AGHAZARIAN

14152 Oxnard St.

Van Nuys, CA 91401

Mailing Address:

509 W. Wilson Ave

Glendale, CA 91203

Smog Check Inspector No. EO 138125

Smog Check Repair Technician License No. El 138125

Brake Adjuster License No. BA 138125, Class C

Lamp Adjuster License No. LA 138125, Class A

Respondents.

Case No. 77/19-17944

OAH No. 2020050028

DECISION

The attached Stipulated Settlement and Disciplinary Order is hereby accepted and adopted by the Director of the Department of Consumer Affairs as the Decision in the above-entitled matter.

This Decision shall become effective on December 31, 2020

DATED: November 20, 2020 Signature on File

GRACE ARUPO RODRIGUEZ
Assistant Deputy Director
Legal Affairs Division
Department of Consumer Affairs

1	XAVIER BECERRA		
	Attorney General of California		
2	MARC D. GREENBAUM Supervising Deputy Attorney General		
3	MICHAEL BROWN Deputy Attorney General		
4	State Bar No. 231237		
5	300 So. Spring Street, Suite 1702 Los Angeles, CA 90013		
6	Telephone: (213) 269-6308		
	Facsimile: (916) 731-2126 E-mail: MichaelB.Brown@doj.ca.gov		
7	Attorneys for Complainant		
8	BERGB		
9	BEFORE THE DEPARTMENT OF CONSUMER AFFAIRS		
10	FOR THE BUREAU OF A		
11	STATE OF C.	ALIFUKNIA	
12			
13	In the Matter of the Accusation Against:	Case No. 77/19-17944	
14	_		
15	VAROOJ AGHAZARIAN- President/Secretary/Treasurer-	OAH No. 2020050028	
16	VAROOJ & SONŠ INC DBA AYA SMOG AND AUTO REPAIR	STIPULATED SETTLEMENT AND	
	14152 Oxnard St	DISCIPLINARY ORDER	
17	Van Nuys, CA 91401 Automotive Repair Dealer Registration No.		
18	ARD 232315 Smog Check Station License No. RC 232315		
19	Lamp Station License No. LS 232315,		
20	Class A Brake Station License No. BS 232315,		
21	Class C		
	and		
22	VAROOJ AGHAZARIAN		
23	14152 Oxnard St. Van Nuys, CA 91401		
24	MAILING ADDRESS		
25	509 W. Wilson Ave. Glendale, CA 91203		
26	Smog Check Inspector License No. EO 138125		
	Smog Check Repair Technician License No.		
27	EI 138125 Brake Adjuster License No. BA 138125,		
28	Class C		
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1	Lamp Adjuster License No. LA 138125, Class A	
2	Respondents.	
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4	IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-	
5	entitled proceedings that the following matters are true:	
6	<u>PARTIES</u>	
7	1. Patrick Dorais ("Complainant") is the Chief of the Bureau of Automotive Repair	
8	("Bureau"). He brought this action solely in his official capacity and is represented in this matter	
9	by Xavier Becerra, Attorney General of the State of California, by Michael Brown, Deputy	
10	Attorney General.	
11	2. Respondent Varooj Aghazarian-President/Secretary/Treasurer-Varooj & Sons Inc dba	
12	Aya Smog and Auto Repair ("Respondent Aya Smog") and Varooj Aghazarian ("Respondent	
13	Aghazarian") are represented in this proceeding by attorney William D. Ferreira, whose address	
14	is: 580 California Street, Suite 1200, San Francisco, CA 94104.	
15	Varooj Aghazarian-President/Secretary/Treasurer-Varooj & Sons Inc dba Aya Smog	
16	and Auto Repair	
17	Automotive Repair Dealer Registration	
18	3. In 2004, the Bureau issued Automotive Repair Dealer Registration Number ARD	
19	232315 to Respondent Aya Smog. The Automotive Repair Dealer Registration was in full force	
20	and effect at all times relevant to the charges brought in Accusation No. 77/19-17944, and will	
21	expire on February 28, 2021, unless renewed.	
22	Smog Check Station License	
23	4. On or about April 9, 2004, the Bureau issued Smog Check Station License Number	
24	RC 232315 to Respondent Aya Smog. The Smog Check Station License was in full force and	
25	effect at all times relevant to the charges brought in Accusation No. 77/19-17944, and will expire	
26	on February 28, 2021, unless renewed.	
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28		

STAR Station Certification 1 On or about January 1, 2013, the Bureau certified Aya Smog and Auto Repair as a 2 STAR Station. The certification will remain active unless ARD 232315 and/or RC 232315 is 3 revoked, canceled, become delinquent, or the certification is invalidated. 4 **Lamp Station License** 5 6. On or about July 21, 2004, the Bureau issued Lamp Station License Number LS 6 232315, Class A to Respondent Aya Smog. The Lamp Station License was in full force and 7 8 effect at all times relevant to the charges brought herein and will expire on February 28, 2021, unless renewed. 9 **Brake Station License** 10 On or about July 21, 2004, the Bureau issued Brake Station License Number BS 11 232315, Class C to Respondent Aya Smog. The Brake Station License was in full force and 12 effect at all times relevant to the charges brought in Accusation No. 77/19-17944, and will expire 13 14 on February 28, 2021, unless renewed. Varooj Aghazarian 15 16 **Smog Check Inspector License** On June 20, 2013, the Bureau issued Smog Check Inspector License Number EO 17 138125 to Respondent Aghazarian. The Smog Check Inspector License was in full force and 18 effect at all times relevant to the charges brought in Accusation No. 77/19-17944, and will expire 19 on August 31, 2021, unless renewed. 20 21 **Smog Check Repair Technician License** 9. On June 20, 2013, the Bureau issued Smog Check Repair Technician License 22 Number EI 138125 to Respondent Aghazarian. The Smog Check Repair Technician License was 23 in full force and effect at all times relevant to the charges brought in Accusation No. 77/19-24 17944, and will expire on August 31, 2021, unless renewed. 25 /// 26 /// 27 28 ///

Brake Adjuster License

10. In 2001, the Bureau issued Brake Adjuster Number BA 138125, Class C to Respondent Aghazarian. The Brake Adjuster was in full force and effect at all times relevant to the charges brought in Accusation No. 77/19-17944, and will expire on August 31, 2023, unless renewed.

Lamp Adjuster License

11. In 2001, the Bureau issued Lamp Adjuster License Number LA 138125, Class A to Respondent Aghazarian. The Lamp Adjuster License was in full force and effect at all times relevant to the charges brought in Accusation No. 77/19-17944, and will expire on August 31, 2023, unless renewed.

JURISDICTION

- 12. Accusation No. 77/19-17944 was filed before the Director of the Department of Consumer Affairs ("Director"), for the Bureau of Automotive Repair, and is currently pending against Respondents Aya Smog and Aghazarian. The Accusation and all other statutorily required documents were properly served on Respondents on April 20, 2020. Respondents timely filed their Notice of Defense contesting the Accusation.
- 13. A copy of Accusation No. 77/19-17944 is attached as exhibit A and incorporated herein by reference.

ADVISEMENT AND WAIVERS

- 14. Respondents Aya Smog and Aghazarian are fully have carefully read, fully discussed with counsel, and understand the charges and allegations in Accusation No. 77/19-17944.

 Respondents have also carefully read, and understand the effect of this Stipulated Settlement and Disciplinary Order.
- 15. Respondents Aya Smog and Aghazarian are fully aware of their legal rights in this matter, including the right to a hearing on the charges and allegations in the Accusation; the right to confront and cross-examine the witnesses against them; the right to present evidence and to testify on their own behalf; the right to the issuance of subpoenas to compel the attendance of witnesses and the production of documents; the right to reconsideration and court review of an

adverse decision; and all other rights accorded by the California Administrative Procedure Act and other applicable laws.

16. Respondent voluntarily, knowingly, and intelligently waives and gives up each and every right set forth above.

CULPABILITY

- 17. Respondents Aya Smog and Aghazarian admit the truth of each and every charge and allegation in Accusation No. 77/19-17944.
- 18. Respondents Aya Smog and Aghazarian agree that their Automotive Repair Dealer Registration, Smog Check Station License, Lamp Station License, Brake Station License, Smog Check Inspector License, Smog Check Repair Technician License, Brake Adjuster License and Lamp Adjuster License are subject to discipline and they agree to be bound by the Director's probationary terms as set forth in the Disciplinary Order below.

CONTINGENCY

- 19. This stipulation shall be subject to approval by the Director of Consumer Affairs or the Director's designee. Respondents Aya Smog and Aghazarian understand and agree that counsel for Complainant and the staff of the Bureau of Automotive Repair may communicate directly with the Director and staff of the Department of Consumer Affairs regarding this stipulation and settlement, without notice to or participation by Respondents or their counsel. By signing the stipulation, Respondents understand and agree that they may not withdraw their agreement or seek to rescind the stipulation prior to the time the Director considers and acts upon it. If the Director fails to adopt this stipulation as the Decision and Order, the Stipulated Settlement and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Director shall not be disqualified from further action by having considered this matter.
- 20. The parties understand and agree that Portable Document Format (PDF) and facsimile copies of this Stipulated Settlement and Disciplinary Order, including PDF and facsimile signatures thereto, shall have the same force and effect as the originals.

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- 21. This Stipulated Settlement and Disciplinary Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Settlement and Disciplinary Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.
- 22. In consideration of the foregoing admissions and stipulations, the parties agree that the Director may, without further notice or formal proceeding, issue and enter the following Disciplinary Order:

DISCIPLINARY ORDER

IT IS HEREBY ORDERED that Lamp Station License No. LS 232315 and Brake Station License No. BS 232315 issued to Respondent Aya Smog are revoked and accepted by the Director of Consumer Affairs.

IT IS HEREBY FURTHER ORDERED that Automotive Repair Dealer Registration No. ARD 232315 and Smog Check Station License No. RC 232315 issued to Respondent Aya Smog are revoked. However, the revocation is stayed and Respondent Aya Smog is placed on probation for four (4) years on the following terms and conditions.

- 1. **Actual Suspension.** Automotive Repair Dealer Registration No. ARD 232315 issued to Respondent Aya Smog is suspended for seven (7) consecutive days beginning on the effective date of the Decision and Order.
- 2. **Posting of Sign.** During the period of suspension, Respondent Aya Smog shall prominently post a sign or signs, provided by BAR, indicating the beginning and ending dates of the suspension and indicating the reason for the suspension. The sign or signs shall be conspicuously displayed in a location or locations open to and frequented by customers. The location(s) of the sign(s) shall be approved by BAR and shall remain posted during the entire period of actual suspension.
- 3. **Obey All Laws.** During the period of probation, Respondent Aya Smog shall comply with all federal and state statutes, regulations and rules governing all BAR registrations and

licenses held by Respondent Aya Smog.

- 4. **Quarterly Reporting.** During the period of probation, Respondent Aya Smog shall report either by personal appearance or in writing as determined by BAR on a schedule set by BAR, but no more frequently than once each calendar quarter, on the methods used and success achieved in maintaining compliance with the terms and conditions of probation.
- 5. **Report Financial Interests.** Respondent Aya Smog shall, within 30 days of the effective date of the decision and within 30 days from the date of any request by BAR during the period of probation, report any financial interest which any Respondent or any partners, officers, or owners of any Respondent Aya Smog's facility may have in any other business required to be registered pursuant to Section 9884.6 of the Business and Professions Code.
- 6. Access to Examine Vehicles and Records. Respondent Aya Smog shall provide BAR representatives unrestricted access to examine all vehicles (including parts) undergoing service, inspection, or repairs, up to and including the point of completion. Respondent Aya Smog shall also provide BAR representatives unrestricted access to all records pursuant to BAR laws and regulations.
- 7. **Tolling of Probation.** If, during probation, Respondent Aya Smog leaves the jurisdiction of California to reside or do business elsewhere or otherwise ceases to do business in the jurisdiction of California, Respondent Aya Smog shall notify BAR in writing within 10 days of the dates of departure and return, and of the dates of cessation and resumption of business in California. All provisions of probation other than cost reimbursement requirements, restitution requirements, training requirements, and that Respondent Aya Smog obey all laws, shall be held in abeyance during any period of time of 30 days or more in which Respondent Aya Smog is not residing or engaging in business within the jurisdiction of California. All provisions of probation shall recommence on the effective date of resumption of business in California. Any period of time of 30 days or more in which Respondent Aya Smog is not residing or engaging in business within the jurisdiction of California shall not apply to the reduction of this probationary period or to any period of actual suspension not previously completed. Tolling is not available if business or work relevant to the probationary license or registration is conducted or performed during the

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Violation of Probation. If Respondent Aya Smog violates or fails to comply with the terms and conditions of probation in any respect, the Director, after giving notice and opportunity to be heard may set aside the stay order and carry out the disciplinary order provided in the decision. Once Respondent Aya Smog is served notice of BAR's intent to set aside the stay, the Director shall maintain jurisdiction, and the period of probation shall be extended until final resolution of the matter.

- 9. Maintain Valid License. Respondent Aya Smog shall, at all times while on probation, maintain a current and active registration and/or license(s) with BAR, including any period during which suspension or probation is tolled. If Respondent Aya Smog's registration or license is expired at the time the decision becomes effective, the registration or license must be renewed by Respondent Aya Smog within 30 days of that date. If Respondent Aya Smog's registration or license expires during a term of probation, by operation of law or otherwise, then upon renewal Respondent Aya Smog's registration or license shall be subject to any and all terms and conditions of probation not previously satisfied. Failure to maintain a current and active registration and/or license during the period of probation shall also constitute a violation of probation.
- 10. **Cost Recovery.** Respondents Aya Smog and Aghazarian shall jointly and severally be obligated to reimburse the \$3,745.08 for its investigation and prosecution costs of case No. 77/19-17944. Respondent Aya Smog shall make such payment as follows: Respondent Aya Smog shall make thirty-six (36) equal monthly payments of \$104.03 per month, beginning the month of the effective date of the Director's Decision and Order. Any agreement for a scheduled payment plan shall require full payment to be completed no later than six (6) months before probation terminates. Respondent Aya Smog shall make payment by check or money order payable to the Bureau of Automotive Repair and shall indicate on the check or money order that it is for cost recovery payment for case No. 77/19-17944. Any order for payment of cost recovery shall remain in effect whether or not probation is tolled. Probation shall not terminate until full cost recovery payment has been made. BAR reserves the right to pursue any other lawful

measures in collecting on the costs ordered and past due, in addition to taking action based upon the violation of probation.

- 11. **Completion of Probation**. Upon successful completion of probation, Respondent Aya Smog's affected registration and/or license will be fully restored or issued without restriction, if Respondent Aya Smog meets all current requirements for registration or licensure and has paid all outstanding fees, monetary penalties, or cost recovery owed to BAR.
- 12. **License Surrender.** Following the effective date of a decision that orders a stay of invalidation or revocation, if Respondent Aya Smog ceases business operations or is otherwise unable to satisfy the terms and conditions of probation, Respondent Aya Smog may request that the stay be vacated. Such request shall be made in writing to BAR. The Director and the BAR Chief reserve the right to evaluate the Respondent Aya Smog's request and to exercise discretion whether to grant the request or take any other action deemed appropriate or reasonable under the circumstances. Upon formal granting of the request, the Director will vacate the stay order and carry out the disciplinary order provided in the decision. Respondent Aya Smog may not petition the Director for reinstatement of the surrendered registration and/or license, or apply for a new registration or license under the jurisdiction of BAR at any time before the date of the originally scheduled completion of probation. If Respondent applies to BAR for a registration or license at any time after that date, Respondent Aya Smog must meet all current requirements for registration or licensure and pay all outstanding fees or cost recovery owed to BAR and left outstanding at the time of surrender.
- 13. **No STAR Certification Invalidation**. The Bureau of Automotive Repair shall not invalidate Respondent Aya Smog's STAR certification based upon the Accusation; however, it may consider Respondents' citation and disciplinary history in any future proceeding brought before the Director.

IT IS HEREBY ORDERED that Brake Adjuster License No. BA 138125 and Lamp Adjuster License No. LA 138125 issued to Respondent Aghazarian are revoked and accepted by the Director of Consumer Affairs.

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IT IS FURTHER ORDERED that Smog Check Inspector License Number EO 138125 and Smog Check Repair Technician License Number EI 138125 are revoked. However, the revocation is stayed and Respondent Aghazarian is placed on probation for four (4) years on the following terms and conditions.

- 1. Actual Suspension. Smog Check Inspector License Number EO 138125 and Smog Check Repair Technician License Number EI 138125 issued to Respondent Aghazarian are suspended for seven (7) consecutive days beginning on the effective date of the Decision and Order.
- 2. **Obey All Laws.** During the period of probation, Respondent Aghazarian shall comply with all federal and state statutes, regulations and rules governing all BAR registrations and licenses held by Respondent Aghazarian.
- 3. Quarterly Reporting. During the period of probation, Respondent Aghazarian shall report either by personal appearance or in writing as determined by BAR on a schedule set by BAR, but no more frequently than once each calendar quarter, on the methods used and success achieved in maintaining compliance with the terms and conditions of probation.
- 4. **Report Financial Interests.** Respondent Aghazarian shall, within 30 days of the effective date of the decision and within 30 days from the date of any request by BAR during the period of probation, report any financial interest which any Respondent or any partners, officers, or owners of any Respondent Aghazarian's facility may have in any other business required to be registered pursuant to Section 9884.6 of the Business and Professions Code.
- 5. Access to Examine Vehicles and Records. Respondent Aghazarian shall provide BAR representatives unrestricted access to examine all vehicles (including parts) undergoing service, inspection, or repairs, up to and including the point of completion. Respondent Aghazarian shall also provide BAR representatives unrestricted access to all records pursuant to BAR laws and regulations.
- 6. **Tolling of Probation.** If, during probation, Respondent Aghazarian leaves the jurisdiction of California to reside or do business elsewhere or otherwise ceases to do business in the jurisdiction of California, Respondent Aghazarian shall notify BAR in writing within 10 days

of the dates of departure and return, and of the dates of cessation and resumption of business in California.

All provisions of probation other than cost reimbursement requirements, restitution requirements, training requirements, and that Respondent Aghazarian obey all laws, shall be held in abeyance during any period of time of 30 days or more in which Respondent Aghazarian is not residing or engaging in business within the jurisdiction of California. All provisions of probation shall recommence on the effective date of resumption of business in California. Any period of time of 30 days or more in which Respondent Aghazarian is not residing or engaging in business within the jurisdiction of California shall not apply to the reduction of this probationary period or to any period of actual suspension not previously completed. Tolling is not available if business or work relevant to the probationary license or registration is conducted or performed during the tolling period.

- 7. **Violation of Probation**. If Respondent Aghazarian violates or fails to comply with the terms and conditions of probation in any respect, the Director, after giving notice and opportunity to be heard may set aside the stay order and carry out the disciplinary order provided in the decision. Once Respondent Aghazarian is served notice of BAR's intent to set aside the stay, the Director shall maintain jurisdiction, and the period of probation shall be extended until final resolution of the matter.
- 8. **Maintain Valid License.** Respondent Aghazarian shall, at all times while on probation, maintain a current and active registration and/or license(s) with BAR, including any period during which suspension or probation is tolled. If Respondent Aghazarian's registration or license is expired at the time the decision becomes effective, the registration or license must be renewed by Respondent Aghazarian within 30 days of that date. If Respondent Aghazarian's registration or license expires during a term of probation, by operation of law or otherwise, then upon renewal Respondent Aghazarian's registration or license shall be subject to any and all terms and conditions of probation not previously satisfied. Failure to maintain a current and active registration and/or license during the period of probation shall also constitute a violation of probation.

- 9. Cost Recovery. Respondents Aya Smog and Aghazarian shall jointly and severally be obligated to reimburse the \$3,745.08 such payment as follows: Respondent Aghazarian shall make thirty-six (36) equal monthly payments of \$104.03 per month, beginning the month of the effective date of the Director's Decision and Order. Any agreement for a scheduled payment plan shall require full payment to be completed no later than six (6) months before probation terminates. Respondent Aghazarian shall make payment by check or money order payable to the Bureau of Automotive Repair and shall indicate on the check or money order that it is for cost recovery payment for case No. 77/19-17944. Any order for payment of cost recovery shall remain in effect whether or not probation is tolled. Probation shall not terminate until full cost recovery payment has been made. BAR reserves the right to pursue any other lawful measures in collecting on the costs ordered and past due, in addition to taking action based upon the violation of probation.
- 10. **Completion of Probation**. Upon successful completion of probation, Respondent Aghazarian's affected registration and/or license will be fully restored or issued without restriction, if Respondent Aghazarian meets all current requirements for registration or licensure and has paid all outstanding fees, monetary penalties, or cost recovery owed to BAR.
- 11. License Surrender. Following the effective date of a decision that orders a stay of invalidation or revocation, if Respondent Aghazarian ceases business operations or is otherwise unable to satisfy the terms and conditions of probation, Respondent Aghazarian may request that the stay be vacated. Such request shall be made in writing to BAR. The Director and the BAR Chief reserve the right to evaluate the Respondent Aghazarian's request and to exercise discretion whether to grant the request or take any other action deemed appropriate or reasonable under the circumstances. Upon formal granting of the request, the Director will vacate the stay order and carry out the disciplinary order provided in the decision. Respondent Aghazarian may not petition the Director for reinstatement of the surrendered registration and/or license, or apply for a new registration or license under the jurisdiction of BAR at any time before the date of the originally scheduled completion of probation. If Respondent Aghazarian applies to BAR for a registration or license at any time after that date, Respondent Aghazarian must meet all current

1	requirements for registration or licensure and pay all outstanding fees or cost recovery owed to	
2	BAR and left outstanding at the time of surrender.	
3	<u>ACCEPTANCE</u>	
4	I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully	
5	discussed it with my attorney, William D. Ferreira. I understand the stipulation and the effect it	
6	will have on my Automotive Repair Dealer Registration, Smog Check Station License, Lamp	
7	Station License and Brake Station License. I enter into this Stipulated Settlement and Disciplinary	
8	Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order	
9	of the Director of the Department of Consumer Affairs.	
10		
11	DATED: October 14, 2020 Signed Copy on File	
12	VAROOJ AGHAZARIAN- President/Secretary/Treasurer-	
13	VAROOJ & SONS INC DBA AYA SMOG AND AUTO REPAIR	
14	Respondent	
15	I have carefully read the above Stipulated Settlement and Disciplinary Order and have fully	
16	discussed it with my attorney, William D. Ferreira. I understand the stipulation and the effect it	
17	will have on my Smog Check Inspector License, Smog Check Repair Technician License, Brake	
18	Adjuster License and Lamp Adjuster License. I enter into this Stipulated Settlement and	
19	Disciplinary Order voluntarily, knowingly, and intelligently, and agree to be bound by the	
20	Decision and Order of the Director of Consumer Affairs.	
21	DATED: October 14, 2020 Signed Copy on File	
22	VAROOJ AGHAZARIAN Respondent	
23	I have read and fully discussed with Respondents Varooj Aghazarian-	
24	President/Secretary/Treasurer-Varooj & Sons Inc dba Aya Smog and Auto Repair and Varooj	
25	Aghazarian the terms and conditions and other matters contained in the above Stipulated	
26	Settlement and Disciplinary Order. I approve its form and content.	
27	DATED: October 14, 2020 Signed Copy on File	
28	WILLIAM D. FERREIRA Attorney for Respondent	
	13	

STIPULATED SETTLEMENT (77/19-17944)

1	ENDORSEMENT		
2	The foregoing Stipulated Settlement and Disciplinary Order is hereby respectfully		
3	submitted for consideration by the Director of the Department of Consumer Affairs.		
4	DATED 0 4 1 14 2020 B 46 H 1 34 1		
5	DATED: October 14 2020 Respectfully submitted,		
6	XAVIER BECERRA Attorney General of California MARC D. GREENBAUM		
7	Supervising Deputy Attorney General		
8			
9	Signed Copy on File MICHAEL BROWN		
10	Deputy Attorney General Attorneys for Complainant		
11	Attorneys for Complainant		
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STIPULATED SETTLEMENT (77/19-17944)