

1 JEFFREY F. ROSEN
2 Santa Clara County District Attorney
3 Christopher Judge (SBN 274418)
4 Deputy District Attorney
5 70 West Hedding Street
6 San Jose, CA 95110
7 Telephone: (408) 299-7400
8 Email: cjudge@dao.sccgov.org
9 *Attorneys for Plaintiff*

10 (For list of additional Plaintiff's counsel,
11 see Appendix attached to Complaint)

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
13 **IN AND FOR THE COUNTY OF SANTA CLARA**

14 THE PEOPLE OF THE STATE OF CALIFORNIA,) CASE NO. 25CV457431
15)
16 Plaintiff,) COMPLAINT FOR EQUITABLE RELIEF,
17) INCLUDING AN INJUNCTION,
18 v.) RESTITUTION, AND CIVIL PENALTIES
19) (Bus. & Prof. Code, § 17200 et seq.)
20 ALLISON BAVARIAN;)
21 AN FREMONT LUXURY IMPORTS, INC.;)
22 AN IMPORTS OF STEVENS CREEK, INC.;)
23 AN LUXURY IMPORTS OF SAN DIEGO,)
24 INC.;)
25 AN SAN JOSE LUXURY IMPORTS INC.;)
26 AN VALENCIA AUTO IMPORTS, INC.;)
27 AUTO CAR, INC.;)
28 AUTO COMPANY XIX, INC.;)
AUTO COMPANY XXII, INC.;)
AUTO COMPANY XXIII, INC.;)
AUTO MISSION LTD.;)
BARGAIN RENT-A-CAR;)
BUENA PARK LUXURY IMPORTS, INC.;)
CARWELL, LLC;)
COSTA MESA CARS, INC.;)
EDGREN MOTOR COMPANY, INC.;)
FIT KIT, INC.;)
G.B. IMPORT SALES & SERVICE, LLC;)
HOUSE OF IMPORTS, INC.;)
IRVINE IMPORTS, INC.)
JOE MACPHERSON FORD;)
JOE MACPHERSON INFINITI;)
MAGIC ACQUISITION CORP.;)
MR. WHEELS, INC.;)
NEWPORT BEACH CARS, LLC;)
OXNARD EUROPEAN MOTORS, LLC;)
PEYTON CRAMER AUTOMOTIVE;)

1 PEYTON CRAMER FORD;)
 2 ROSEVILLE MOTOR CORPORATION;)
 3 STEVENS CREEK LUXURY IMPORTS,)
 4 INC.;)
 5 STEVENS CREEK MOTORS, INC.;)
 6 TERRY YORK MOTOR CARS, LTD.;)
 7 VALENCIA B. IMPORTS, INC.;)
 8 VALENCA H. IMPORTS, INC.;)
 9 VANDERBEEK MOTORS, INC.;)
 10 VINCE WIESE CHEVROLET, INC.;)
 11 VISTACAL LUXURY IMPORTS, INC.;)
 12 CREEKSIDE IMPORTS, INC.;)
 13 IMPORTS ON PASEO DEL NORTE, INC.;)
 14 COUNTRY DRIVE CDJR MOTORS, INC.;)
 15 CARCOUNTRY VW IMPORTS, INC.;)
 16 CARCOUNTRY MOTORS, INC.;)
 17 HYG COUNTRY DRIVE IMPORTS, INC.,)
 18)
 19)
 20)
 21)
 22)
 23)
 24)
 25)
 26)
 27)
 28)
 Defendants.)

Plaintiff, the People of the State of California (“the People”), appearing through its attorneys: Jeffrey F. Rosen, District Attorney of Santa Clara County, by Christopher Judge, Deputy District Attorney; Carla Rodriguez, District Attorney of Sonoma County, by Jessica Washington, Deputy District Attorney; Brooke Jenkins, District Attorney of San Francisco, by Matthew Beltramo, Assistant District Attorney; Erik Nasarenko, District Attorney of Ventura County, by Christopher Harman, Deputy District Attorney; Nathan J. Hochman, District Attorney of Los Angeles County, by Steven Wang, Deputy District Attorney, allege as follows:

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction over this action pursuant to Business and Professions Code sections 17203, 17204, 17206, and Article 6, section 10 of the California Constitution.
2. This Court has jurisdiction over Defendants named above and further identified below pursuant to Code of Civil Procedure section 410.10 because the causes of action alleged herein arise out of business activities that occurred throughout the State of California, including the counties of Santa Clara, Riverside, Ventura, Sonoma, and Los Angeles.
3. During the period at issue, Defendants made substantial used vehicle sales to California consumers, including in the counties listed above and elsewhere throughout the State

1 of California.

2 4. Venue is proper in this Court because the violations of law herein alleged occurred
3 within Santa Clara County and throughout the State of California.

4 **PLAINTIFF**

5 5. Plaintiff, the People, are represented by and through the District Attorneys listed
6 above. Each of these District Attorneys has authority to bring this case on behalf of the People,
7 pursuant to the Unfair Competition Law (Bus. & Prof. Code § 17200 et seq.) and specifically
8 Business and Professions Code sections 17203, 17204, and 17206.

9 **DEFENDANTS**

10 6. Defendant ALLISON BAVARIAN is now, and at all times relevant to the claims
11 in this Complaint was, a California corporation that owned and/or operated as a subsidiary of
12 AutoNation, including BMW of Mountain View, located at 150 E. El Camino Real, Mountain
13 View, in the County of Santa Clara, where the events and actions and omissions complained of
14 herein occurred.

15 7. Defendant AN FREMONT LUXURY IMPORTS, INC., is now, and at all times
16 relevant to the claims in this Complaint was, a Delaware corporation that owned and/or operated
17 as a subsidiary of AutoNation, including BMW of Fremont, located at 5720 Cushing Parkway,
18 Fremont, in the County of Alameda, where the events and actions and omissions complained of
19 herein occurred.

20 8. Defendant AN IMPORTS OF STEVENS CREEK, INC. is now, and at all times
21 relevant to the claims in this Complaint was, a Delaware corporation that owned and/or operated
22 as a subsidiary of AutoNation, including MINI of Stevens Creek, located at 4201 Stevens Creek
23 Boulevard, Santa Clara, in the County of Santa Clara, where the events and actions and omissions
24 complained of herein occurred.

25 9. Defendant AN LUXURY IMPORTS OF SAN DIEGO, INC. is now, and at all
26 times relevant to the claims in this Complaint was, a Delaware corporation that owned and/or
27 operated as a subsidiary of AutoNation, including BMW of Carlsbad, located at 1060 Auto
28 Center Court, Carlsbad, in the County of San Diego, where the events and actions and omissions

1 complained of herein occurred.

2 10. Defendant AN SAN JOSE LUXURY IMPORTS, INC. is now, and at all times
3 relevant to the claims in this Complaint was, a California corporation that owned and/or operated
4 as a subsidiary of AutoNation, including Mercedes-Benz of Stevens Creek, located at 4500
5 Stevens Creek Boulevard, San Jose, and AutoNation Volvo Cars San Jose, located at 4600
6 Stevens Creek Boulevard, San Jose, in the County of Santa Clara, where the events and actions
7 and omissions complained of herein occurred.

8 11. Defendant AN VALENCIA AUTO IMPORTS, INC. is now, and at all times
9 relevant to the claims in this Complaint was, a Delaware corporation that owned and/or operated
10 as a subsidiary of AutoNation, including MINI of Valencia, located at 24135 Creekside Road,
11 Valencia, in the County of Los Angeles, where the events and actions and omissions complained
12 of herein occurred.

13 12. Defendant AUTO CAR, INC. is now, and at all times relevant to the claims in this
14 Complaint was, a California corporation that owned and/or operated as a subsidiary of
15 AutoNation, including AutoNation Honda Roseville, located at 230 Auto Mall Drive, Roseville,
16 in the County of Placer, where the events and actions and omissions complained of herein
17 occurred.

18 13. Defendant AUTO COMPANY XIX, INC. is now, and at all times relevant to the
19 claims in this Complaint was, a Delaware corporation that owned and/or operated as a subsidiary
20 of AutoNation, including Porsche Irvine, located at 14500 Scientific Way, Irvine, in the County
21 of Orange, where the events and actions and omissions complained of herein occurred.

22 14. Defendant AUTO COMPANY XXII, INC. is now, and at all times relevant to the
23 claims in this Complaint was, a Delaware corporation that owned and/or operated as a subsidiary
24 of AutoNation, including Mercedes-Benz of San Jose/smart Center San Jose, located at 3000 East
25 Capitol Expressway, San Jose, in the County of Santa Clara, where the events and actions and
26 omissions complained of herein occurred.

27 15. Defendant AUTO COMPANY XXIII, INC. is now, and at all times relevant to the
28 claims in this Complaint was, a Delaware corporation that owned and/or operated as a subsidiary

1 of AutoNation, including AutoNation Chrysler Dodge Jeep Ram Valencia, located at 23820
2 Creekside Road, Valencia, in the County of Los Angeles, where the events and actions and
3 omissions complained of herein occurred.

4 16. Defendant AUTO MISSION LTD. is now, and at all times relevant to the claims
5 in this Complaint was, a California corporation that owned and/or operated as a subsidiary of
6 AutoNation, including AutoNation Toyota Hayward, located at 24773 Mission Boulevard,
7 Hayward, in the County of Alameda, where the events and actions and omissions complained of
8 herein occurred.

9 17. Defendant BARGAIN RENT-A-CAR is now, and at all times relevant to the
10 claims in this Complaint was, a California corporation that owned and/or operated as a subsidiary
11 of AutoNation, including Lexus of Cerritos, located at 18800 Studebaker Road, Cerritos, in the
12 County of Los Angeles, where the events and actions and omissions complained of herein
13 occurred.

14 18. Defendant BUENA PARK LUXURY IMPORTS, INC. is now, and at all times
15 relevant to the claims in this Complaint was, a Delaware corporation that owned and/or operated
16 as a subsidiary of AutoNation, including BMW of Buena Park, located at 6750 Auto Center
17 Drive, Buena Park, in the County of Orange, where the events and actions and omissions
18 complained of herein occurred.

19 19. Defendant CARWELL, LLC is now, and at all times relevant to the claims in this
20 Complaint was, a Delaware limited liability company that owned and/or operated as a subsidiary
21 of AutoNation, including Mercedes-Benz of South Bay, located at 3311 Pacific Coast Highway,
22 Torrance, and Jaguar Land Rover South Bay, located at 3233 Pacific Coast Highway, Torrance,
23 in the County of Los Angeles, where the events and actions and omissions complained of herein
24 occurred.

25 20. Defendant COSTA MESA CARS, INC. is now, and at all times relevant to the
26 claims in this Complaint was, a California corporation that owned and/or operated as a subsidiary
27 of AutoNation, including AutoNation Honda Costa Mesa, in the County of Orange, where the
28 events and actions and omissions complained of herein occurred.

1 21. Defendant EDGREN MOTOR COMPANY, INC. is now, and at all times relevant
2 to the claims in this Complaint was, a California corporation that owned and/or operated as a
3 subsidiary of AutoNation, including AutoNation Honda Fremont, located at 5780 Cushing
4 Parkway, Fremont, in the County of Alameda, where the events and actions and omissions
5 complained of herein occurred.

6 22. Defendant FIT KIT, INC. is now, and at all times relevant to the claims in this
7 Complaint was, a California corporation that owned and/or operated as a subsidiary of
8 AutoNation, including AutoNation Toyota Buena Park, located at 6400 Beach Boulevard, Buena
9 Park, in the County of Orange, where the events and actions and omissions complained of herein
10 occurred.

11 23. Defendant G.B. IMPORT SALES & SERVICE, LLC is now, and at all times
12 relevant to the claims in this Complaint was, a Delaware limited liability company that owned
13 and/or operated as a subsidiary of AutoNation, including AutoNation Volvo Cars South Bay,
14 located at 3010 Pacific Coast Highway, Torrance, in the County of Los Angeles, where the events
15 and actions and omissions complained of herein occurred.

16 24. Defendant HOUSE OF IMPORTS, INC. is now, and at all times relevant to the
17 claims in this Complaint was, a California corporation that owned and/or operated as a subsidiary
18 of AutoNation, including House of Imports, located at 6862 Manchester Boulevard, Buena Park,
19 in the County of Orange, where the events and actions and omissions complained of herein
20 occurred.

21 25. Defendant IRVINE IMPORTS, INC. is now, and at all times relevant to the claims
22 in this Complaint was, a California corporation that owned and/or operated as a subsidiary of
23 AutoNation, including AutoNation Toyota Irvine, located at 9101 Research Drive, Irvine, in the
24 County of Orange, where the events and actions and omissions complained of herein occurred.

25 26. Defendant JOE MACPHERSON FORD is now, and at all times relevant to the
26 claims in this Complaint was, a California corporation that owned and/or operated as a subsidiary
27 of AutoNation, including AutoNation Ford Tustin, located at 2 Auto Center Drive, Tustin, in the
28 County of Orange, where the events and actions and omissions complained of herein occurred.

1 27. Defendant JOE MACPHERSON INFINITI is now, and at all times relevant to the
2 claims in this Complaint was, a California corporation that owned and/or operated as a subsidiary
3 of AutoNation, including AutoNation Infiniti Tustin, located at 33 Auto Center Drive, Tustin, in
4 the County of Orange, where the events and actions and omissions complained of herein
5 occurred.

6 28. Defendant MAGIC ACQUISITION CORP. is now, and at all times relevant to the
7 claims in this Complaint was, a Delaware corporation that owned and/or operated as a subsidiary
8 of AutoNation, including AutoNation Ford Valencia, located at 23920 Creekside Road, Valencia,
9 in the County of Los Angeles, where the events and actions and omissions complained of herein
10 occurred.

11 29. Defendant MR. WHEELS, INC. is now, and at all times relevant to the claims in
12 this Complaint was, a California corporation that owned and/or operated as a subsidiary of
13 AutoNation, including AutoNation Toyota Cerritos, located at 18700 Studebaker Road, Cerritos,
14 in the County of Los Angeles, where the events and actions and omissions complained of herein
15 occurred.

16 30. Defendant NEWPORT BEACH CARS, LLC is now, and at all times relevant to
17 the claims in this Complaint was, a Delaware limited liability company that owned and/or
18 operated as a subsidiary of AutoNation, including Audi Newport Beach, located at 445 E. Pacific
19 Coast Highway, Bentley Newport Beach, Porsche of Newport Beach, and Newport Auto Center,
20 located at 3140 Pullman Street, Newport Beach, in the County of Orange, where the events and
21 actions and omissions complained of herein occurred.

22 31. Defendant OXNARD EUROPEAN MOTORS, LLC is now, and at all times
23 relevant to the claims in this Complaint was, a Delaware limited liability company that owned
24 and/or operated as a subsidiary of AutoNation, including Mercedes-Benz of Oxnard/smart Center
25 Oxnard, located at 1511 Auto Center Drive, Oxnard, in the County of Ventura, where the events
26 and actions and omissions complained of herein occurred.

27 32. Defendant PEYTON CRAMER AUTOMOTIVE is now, and at all times relevant
28 to the claims in this Complaint was, a California corporation that owned and/or operated as a

1 subsidiary of AutoNation, including AutoNation Acura South Bay, located at 25341 Crenshaw
2 Boulevard, Torrance, in the County of Los Angeles, where the events and actions and omissions
3 complained of herein occurred.

4 33. Defendant PEYTON CRAMER FORD is now, and at all times relevant to the
5 claims in this Complaint was, a California corporation that owned and/or operated as a subsidiary
6 of AutoNation, including AutoNation Ford Torrance, located at 3111 Pacific Coast Highway,
7 Torrance, in the County of Los Angeles, where the events and actions and omissions complained
8 of herein occurred.

9 34. Defendant ROSEVILLE MOTOR CORPORATION is now, and at all times
10 relevant to the claims in this Complaint was, a California corporation that owned and/or operated
11 as a subsidiary of AutoNation, including AutoNation Chrysler Dodge Jeep Ram Roseville,
12 located at 200 Automall Drive, Roseville, in the County of Placer, where the events and actions
13 and omissions complained of herein occurred.

14 35. Defendant STEVENS CREEK LUXURY IMPORTS, INC. is now, and at all times
15 relevant to the claims in this Complaint was, a Delaware corporation that owned and/or operated
16 as a subsidiary of AutoNation, including AutoNation Maserati of Stevens Creek and AutoNation
17 Alfa Romeo Stevens Creek, located at 4520 Stevens Creek Boulevard, San Jose, in the County of
18 Santa Clara, where the events and actions and omissions complained of herein occurred.

19 36. Defendant STEVENS CREEK MOTORS, INC. is now, and at all times relevant to
20 the claims in this Complaint was, a California corporation that owned and/or operated as a
21 subsidiary of AutoNation, including AutoNation Acura Stevens Creek, located at 4747 Stevens
22 Creek Boulevard, Santa Clara, in the County of Santa Clara, where the events and actions and
23 omissions complained of herein occurred.

24 37. Defendant TERRY YORK MOTOR CARS, LTD. is now, and at all times relevant
25 to the claims in this Complaint was, a California corporation that owned and/or operated as a
26 subsidiary of AutoNation, including Jaguar Land Rover Encino, located at 15800 Ventura
27 Boulevard, Encino, in the County of Los Angeles, where the events and actions and omissions
28 complained of herein occurred.

1 38. Defendant VALENCIA B. IMPORTS, INC. is now, and at all times relevant to the
2 claims in this Complaint was, a Delaware corporation that owned and/or operated as a subsidiary
3 of AutoNation, including Valencia BMW, located at 23435 Creekside Road, Valencia, in the
4 County of Los Angeles, where the events and actions and omissions complained of herein
5 occurred.

6 39. Defendant VALENCIA H. IMPORTS, INC. is now, and at all times relevant to the
7 claims in this Complaint was, a Delaware corporation that owned and/or operated as a subsidiary
8 of AutoNation, including AutoNation Honda Valencia, located at 23551 Magic Mountain
9 Parkway, Valencia, in the County of Los Angeles, where the events and actions and omissions
10 complained of herein occurred.

11 40. Defendant VANDERBEEK MOTORS, INC. is now, and at all times relevant to
12 the claims in this Complaint was, a California corporation that owned and/or operated as a
13 subsidiary of AutoNation, including BMW of Roseville, located at 500 Automall Drive,
14 Roseville, AutoNation Subaru Roseville, located at 250 Automall Drive, Roseville, and
15 AutoNation Mazda Subaru Roseville, located at 100 Automall Drive, Roseville, in the County of
16 Placer, where the events and actions and omissions complained of herein occurred.

17 41. Defendant VINCE WIESE CHEVROLET, INC. is now, and at all times relevant
18 to the claims in this Complaint was, a Delaware corporation that owned and/or operated as a
19 subsidiary of AutoNation, including AutoNation Chevrolet Valencia, located at 26349 W.
20 Valencia Boulevard, Valencia, in the County of Los Angeles, where the events and actions and
21 omissions complained of herein occurred.

22 42. Defendant VISTACAL LUXURY IMPORTS, INC. is now, and at all times
23 relevant to the claims in this Complaint was, a Delaware corporation that owned and/or operated
24 as a subsidiary of AutoNation, including BMW of Vista, located at 1715 Hacienda Drive, Vista,
25 in the County of San Diego, where the events and actions and omissions complained of herein
26 occurred.

27 43. Defendant CREEKSIDE IMPORTS, INC. is now, and at all times relevant to the
28 claims in this Complaint was, a Delaware corporation that owned and/or operated as a subsidiary

1 of AutoNation, including AutoNation Hyundai Valencia, located at 34135 Creekside Road, Santa
2 Clarita, in the County of Los Angeles, where the events and actions and omissions complained of
3 herein occurred.

4 44. Defendant IMPORTS ON PASEO DEL NORTE, INC. is now, and at all times
5 relevant to the claims in this Complaint was, a Delaware corporation that owned and/or operated
6 as a subsidiary of AutoNation, including AutoNation Subaru Carlsbad, located at 5500 Paseo Del
7 Norte, Carlsbad, in the County of San Diego, where the events and actions and omissions
8 complained of herein occurred.

9 45. Defendant COUNTRY DRIVE CDJR MOTORS, INC. is now, and at all times
10 relevant to the claims in this Complaint was, a Delaware corporation that owned and/or operated
11 as a subsidiary of AutoNation, including AutoNation Chrysler Dodge Jeep Ram and FIAT
12 Carlsbad, located at 5555 Car Country Drive, Carlsbad, in the County of San Diego, where the
13 events and actions and omissions complained of herein occurred.

14 46. Defendant CARCOUNTRY VW IMPORTS, INC. is now, and at all times relevant
15 to the claims in this Complaint was, a Delaware corporation that owned and/or operated as a
16 subsidiary of AutoNation, including AutoNation Volkswagen Carlsbad, located at 5515 Car
17 Country Drive, Carlsbad, in the County of San Diego, where the events and actions and omissions
18 complained of herein occurred.

19 47. Defendant CARCOUNTRY MOTORS, INC. is now, and at all times relevant to
20 the claims in this Complaint was, a Delaware corporation that owned and/or operated as a
21 subsidiary of AutoNation, including AutoNation Mazda Carlsbad, located at 5365 Car Country
22 Drive, Carlsbad, in the County of San Diego, where the events and actions and omissions
23 complained of herein occurred.

24 48. Defendant HYG COUNTRY DRIVE IMPORTS, INC. is now, and at all times
25 relevant to the claims in this Complaint was, a Delaware corporation that owned and/or operated
26 as a subsidiary of AutoNation, including AutoNation Volkswagen Carlsbad, located at 5285 Car
27 Country Drive, Carlsbad, in the County of San Diego, where the events and actions and omissions
28 complained of herein occurred.

1 respect. In those instances, Vehicle Code section 4456, subdivision (a)(6), is triggered. It states
2 that, “If the department returns an application and the application was first received by the
3 department more than 30 days from the date of sale of the vehicle if the vehicle is a used vehicle
4 [i.e., in an untimely manner] ..., the dealer or lessor-retailer *shall submit a corrected application*
5 *to the department within 50 days from the date of sale of the vehicle*”

6 54. The Vehicle Code also imposes requirements on sellers of used vehicles to deliver
7 the certificate of ownership (i.e., the title or “pink slip”). For licensed used car dealers, the
8 timeframe for delivery of the certificate of ownership correlates to the timeframe for submitting
9 an application to transfer registration. Vehicle Code section 5753, subdivision (b), states in
10 relevant part that, “Except when the certificate of ownership is demanded in writing by a
11 purchaser, a vehicle dealer licensed under this code shall satisfy the delivery requirement of this
12 section by submitting appropriate documents and fees to the department for transfer of
13 registration in accordance with Sections 5906^[1] and 4456 of this code and rules and regulations
14 promulgated thereunder.” (Emphasis added.)

15 **FACTUAL BACKGROUND**

16 55. Defendants are part of a network of new and used car dealers within the network
17 of dealerships owned, through subsidiaries, by AutoNation, Inc. (“AutoNation”), a publicly
18 traded company. Through this extensive network, AutoNation is one of the largest automotive
19 retailers in the United States, with more than 300 dealerships and other facilities in at least 20
20 states, including the State of California.

21 56. Defendants each operate one or more dealerships that are or were during the
22 relevant time period licensed to sell used cars in the State of California.

23 57. As described above, California’s Vehicle Code imposes statutory deadlines on
24 licensed sellers of used vehicles regarding the submittal and, if necessary, resubmittal of
25 applications for transfer of registration and delivery of certificates of ownership.

26 58. In thousands of instances dating back to 2019, Defendants failed to timely submit
27

28 ¹ Vehicle Code section 5906 pertains to the transfer of vehicles to a licensed dealer. It is not
implicated by this case.

1 and, as applicable, resubmit to the DMV applications for transfer of registration of used vehicles
2 and failed to deliver certificates of ownership for those vehicles in a timely manner as prescribed
3 by law.

4 **FIRST CAUSE OF ACTION**

5 **VIOLATIONS OF BUSINESS AND PROFESSIONS CODE SECTION 17200**

6 **(Unfair Competition)**

7 **(Against All Defendants)**

8 59. The People re-allege and incorporate by reference the preceding paragraphs of this
9 Complaint as though fully set forth herein.

10 60. Beginning at an exact date which is unknown to the People, but within four years
11 prior to the filing of this Complaint, plus the period of time in which civil statutes of limitations
12 were tolled as a result of the California Judicial Council's Emergency rule 9(a), plus additional
13 tolling under the parties' Agreement Tolling the Statutes of Limitation in this matter, including
14 stipulated extensions thereto, Defendants engaged in a course of conduct that constituted acts of
15 unfair competition, as defined by Business and Professions Code section 17200, by committing
16 the following acts:

- 17 a. Violating Vehicle Code section 4456, subdivision (a)(2), by failing to submit
18 applications to the DMV accompanied by all fees and penalties due for registration
19 or transfer of registration of the vehicle within 30 days from the date of sale;
- 20 b. Violating Vehicle Code section 4456, subdivision (a)(5), by failing to resubmit
21 initially timely applications to the DMV within 50 days from the date of sale or
22 within 30 days from the date that the application was first returned by the DMV,
23 whichever was later;
- 24 c. Violating Vehicle Code section 4456, subdivision (a)(6), by failing to resubmit
25 initially untimely applications to the DMV within 50 days from the date of sale;
- 26 d. Violating Vehicle Code section 5753, subdivision (b), by failing to deliver
27 certificates of ownership in accordance with the statutory deadlines found in
28 Vehicle Code section 4456.

APPENDIX

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

MICHAEL HESTRIN
District Attorney of Riverside County
Evan Goldsmith, SBN# 297356
Deputy District Attorney
3960 Orange Street
Riverside, CA 92501
Phone: 951-955-5400
Email: EvanGoldsmith@RivCoDA.org

BROOKE JENKINS
District Attorney of San Francisco
Matthew Beltramo, SBN # 184796
Assistant District Attorney
350 Rhode Island Street
North Building, Suite 400N
San Francisco, CA 94103
Telephone: (628) 652-4000
E-mail: Matthew.Beltramo@sfgov.org

CARLA RODRIGUEZ
District Attorney, County of Sonoma
Jessica Washington, SBN #282863
Deputy District Attorney
2300 County Center Dr., Ste. B-170
Santa Rosa, CA 95403
Telephone: (707) 565-3161
E-mail: jessica.washington@sonoma-county.org

ERIK NASARENKO
District Attorney of Ventura County
Christopher Harman, SBN #155353
Deputy District Attorney
5720 Ralston Street, Suite 300
Ventura, CA 93003
Phone: 805-654-3850
Email: chris.harman@ventura.org

NATHAN J. HOCHMAN
District Attorney of Los Angeles County
Steven Wang, SBN # 221950
Deputy District Attorney
211 W. Temple Street, 10th Fl.
Los Angeles, CA 90012
Tel: (213) 257-2450
Email: swang@da.lacounty.gov