

BEFORE THE DIRECTOR
DEPARTMENT OF CONSUMER AFFAIRS
CEMETERY AND FUNERAL BUREAU
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

ALL BRASS MEMORIAL CHAPEL,
MICHAEL A. BRASS, JR., Owner

Funeral Establishment License No. FD 1922,
Respondent.

Case No. A1 2007 292

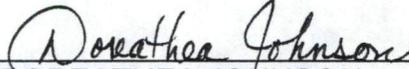
OAH No. 2008120591

DECISION

The attached Order on Motion for Proposed Decision and Proposed Decision and Order is hereby accepted and adopted as the Decision of the Director of the Department of Consumer Affairs in the above-entitled matter.

This Decision shall become effective September 1, 2010.

IT IS SO ORDERED this 2 day of August, 2010.



DOREATHEA JOHNSON
Deputy Director, Legal Affairs Division
Department of Consumer Affairs

BEFORE THE
CEMETERY AND FUNERAL BUREAU
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

ALL BRASS MEMORIAL CHAPEL,
MICHAEL A. BRASS, JR., Owner

Funeral Establishment No. FD 1922,

Respondent.

Case No. A1 2007 292

OAH No. 2008120591

**ORDER ON MOTION FOR PROPOSED DECISION
AND PROPOSED DECISION AND ORDER**

Complainant's Motion to Enforce Settlement (Motion) came on regularly for hearing before Administrative Law Judge Sophie C. Agopian, Office of Administrative Hearings (OAH), on May 17, 2010, in Los Angeles, California.

Deputy Attorney General Kimberlee D. King represented Complainant Richard L. Wallinder, Chief of the Cemetery and Funeral Bureau (Bureau), Department of Consumer Affairs (Department). Respondent All Brass Memorial Chapel, Michael A. Brass, Jr., Owner, was not present at the hearing on the Motion and was not represented by counsel.

The Motion, which was unopposed by Respondent, is granted with respect to the request that OAH prepare a Proposed Decision in the matter in conformance with a certified transcript of proceedings taking place on September 15, 2009, during which the parties stipulated to a settlement agreement. The Motion is denied with respect to Complainant's request for sanctions pursuant to California Code of Regulations, title 1, section 1040, subdivision (b).

The Proposed Decision and Order is set forth below and is based upon the evidence and argument submitted in support of the Motion and upon other matters which are a part of the record in this case.

FACTUAL FINDINGS

1. Complainant brought the Accusation in his official capacity.

2. A hearing on the Accusation was scheduled to commence on September 15, 2009. On the day of the hearing, the parties appeared before Administrative Law Judge Daniel Juarez. Complainant was represented by Ms. King. Respondent was represented by counsel, James V. Kosnett.

3. In lieu of proceeding with the hearing, the parties, by and through their counsel, stipulated to a settlement agreement, which was placed orally on the record.

4. The terms of the agreement included the surrender of Respondent's Funeral Establishment License Number FD 1922 and payment to the Bureau for its costs of investigation and enforcement in the matter in the amount of \$7,000. According to the transcript of the September 15, 2009, proceedings, Respondent would only be responsible for paying such costs "if and when he is accepted and relicensed." (Exhibit E to Motion.) The parties agreed that a written stipulation setting forth these terms would be prepared for the parties to sign.

5. The parties were advised and agreed that if they were unable to agree to a written stipulation they could file a motion to have the transcript of the September 15, 2009, proceedings reduced to a proposed decision which the Bureau may adopt as its final decision.

6. On October 14, 2009, the Bureau prepared and transmitted a written stipulation setting forth the "terms of the agreement" to Mr. Kosnett. The stipulation included terms that were not discussed nor agreed to during the September 15, 2009, proceeding, including Respondent's admission to "the truth of each and every charge and allegation in the Accusation."

7. From September 15, 2009, until April 2010, the Bureau did not receive any communication or response from Respondent or his counsel.

8. On February 18, 2010, the Bureau filed the present Motion, which was properly served upon Respondent. The Motion was served upon his attorney and at Respondent's business address.

9. On April 22, 2010, Mr. Kosnett advised the Bureau that he no longer represented Respondent.¹ Because Mr. Kosnett did not state the date in which his representation of Respondent terminated, out of caution, the Bureau served the Motion again upon Respondent at a "P.O. Box" address that was his last known address.² Despite proper service, Respondent did not appear at the hearing on the Motion or oppose the Motion.

¹ Mr. Kosnett's April 22, 2010, letter to the Bureau was marked for identification as Respondent's Exhibit F to the Motion and is made part of the record.

² The proof of service was marked for identification as Respondent's Exhibit G to the Motion and is made part of the record.

10. By the Motion, the Bureau seeks sanctions in the amount of \$1,785 against Respondent pursuant to California Code of Regulations, title 1, section 1040, based on the allegations that Respondent's failure to execute the stipulation and lack of responsiveness in this matter constitutes "bad faith actions or tactics that are frivolous or solely intended to cause unnecessary delay."

LEGAL CONCLUSIONS

1. Respondent's failure to execute the stipulation and lack of responsiveness in this matter is good cause to issue a Proposed Decision and Order without a hearing on the merits of the Accusation and based solely upon the transcript of the September 15, 2009, proceedings. Consequently, material terms that were not expressly agreed upon during the September 15, 2009, proceeding, such as the term set forth in Factual Finding 6, will not be included in the Order.

2. *Sanctions.* California Code of Regulations, title 1, section 1040, states:

(a) The ALJ may order a party, a party's representative or both, to pay reasonable expenses, including attorney's fees, incurred by another party as a result of bad faith actions or tactics that are frivolous or solely intended to cause unnecessary delay.

(1) "Actions or tactics" include, but are not limited to, the making or opposing of Motions or the failure to comply with a lawful order of the ALJ.

(2) "Frivolous" means

(A) totally and completely without merit or

(B) for the sole purpose of harassing an opposing party.

(b) The ALJ shall not impose sanctions without providing notice and an opportunity to be heard.

(c) The ALJ shall determine the reasonable expenses based upon testimony under oath or a Declaration setting for the specific expenses incurred as a result of the bad faith conduct. An order for sanctions may be made on the record or in writing, setting forth the factual findings on which the sanction are based.

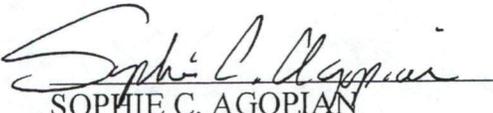
3. Cause does not exist to impose sanctions against Respondent because the evidence did not establish that his conduct was in "bad faith," "frivolous," or "solely intended to cause unnecessary delay." As set forth in Factual Finding 7, Respondent did not respond to communications from the Bureau and did not appear in the proceedings since September 15, 2009. The reasons for his nonresponsiveness were not established in the evidence and therefore do not constitute grounds for sanctions. Respondent did not violate any order of the ALJ; he has failed to agree to a written stipulation prepared by the Bureau

that contained terms that were neither discussed nor agreed upon during the September 15, 2009, hearing. (Factual Finding 6.) This does not demonstrate “bad faith” or “frivolous” tactics. The remedy for Respondent’s failure to respond to and/or execute the written stipulation is the Motion filed by the Bureau and the Order that follows here.

ORDER

1. Funeral Establishment License Number FD 1922 (funeral license), issued to Respondent All Brass Memorial Chapel, Michael A. Brass, Jr., Owner, is surrendered and accepted by the Department of Consumer Affairs.
2. The surrender of Respondent’s funeral license is effective on the date that the Department adopts a final decision in this matter.
3. Respondent shall pay the Bureau its costs of investigation and enforcement in this matter in the amount of \$7,000, prior to the issuance of a new or reinstated license. If Respondent does not apply for, or is not issued, a new or reinstated license, Respondent does not owe such costs to the Bureau.
4. Complainant’s request for sanctions against Respondent is denied.

DATED: July 14, 2010


SOPHIE C. AGOPIAN
Administrative Law Judge
Office of Administrative Hearings

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of the State of California
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6 Attorneys for Complainant

7
8 **BEFORE THE**
CEMETERY AND FUNERAL BUREAU
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the Accusation Against:

Case No. A1 2007 292

11 **ALL BRASS MEMORIAL CHAPEL,**
MICHAEL A. BRASS, JR., OWNER
12 Michael A. Brass, Jr., Owner
11030 S. Willowbrook Avenue
13 Los Angeles, CA 90059

NOTICE OF DISMISSAL OF
ACCUSATION AS TO SHON-TAI M.
BURTON

14 Funeral Establishment No. FD 1922,

15 **KEITH NATHANIEL WARFIELD**
11030 South Willowbrook Avenue
16 Los Angeles, CA 90059

17 Funeral Director License No. FDR 2031,

18 **ASA DEMOND SAUNDERS**
216 S. Norma Street
19 Ridgecrest, CA 93555

20 Funeral Director No. FDR 2537

21 and

22 **SHON-TAI M. BURTON**
1712 W. 113th Street
23 Los Angeles, CA 90047

24 Funeral Director No. FDR 3039

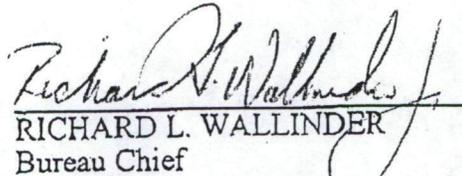
25 Respondents.

26
27 **TO THE OFFICE OF ADMINISTRATIVE HEARINGS, RESPONDENTS, ALL**
28 **BRASS MEMORIAL CHAPEL, MICHAEL A. BRASS, JR., OWNER, KEITH NATHANIEL**

1 WARFIELD, SHON-TAI M. BURTON AND THEIR COUNSEL OF RECORD FOR
2 RESPONDENT:

3 PLEASE TAKE NOTICE that the above-caption Accusation Case No. A1 2007 292,
4 filed on July 11, 2008 against SHON-TAI M. BURTON is hereby dismissed.

5 DATED: 9/14/09

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8 
9 RICHARD L. WALLINDER
10 Bureau Chief
11 Cemetery and Funeral Bureau
12 Department of Consumer Affairs
13 State of California
14 Complainant

12 LA2008600376

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8 **BEFORE THE**
CEMETERY AND FUNERAL BUREAU
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the Accusation Against:

Case No. A1 2007 292

11 ALL BRASS MEMORIAL CHAPEL,
MICHAEL A. BRASS, JR., OWNER
12 Michael A. Brass, Jr., Owner
11030 S. Willowbrook Avenue
13 Los Angeles, CA 90059

**NOTICE OF DISMISSAL OF
ACCUSATION AS TO ASA
DEMOND SAUNDERS**

14 Funeral Establishment No. FD 1922,

15 KEITH NATHANIEL WARFIELD
11030 South Willowbrook Avenue
16 Los Angeles, CA 90059

17 Funeral Director License No. FDR 2031,

18 ~~ASA DEMOND SAUNDERS~~
216 S. Norma Street
19 Ridgecrest, CA 93555

20 Funeral Director No. FDR 2537

21 and

22 SHON-TAI M. BURTON
1712 W. 113th Street
23 Los Angeles, CA 90047

24 Funeral Director No. FDR 3039

25 Respondents.

26
27 TO THE OFFICE OF ADMINISTRATIVE HEARINGS, RESPONDENTS, ALL
28 BRASS MEMORIAL CHAPEL, MICHAEL A. BRASS, JR., OWNER, KEITH NATHANIEL

1 WARFIELD, ASA DEMOND SAUNDERS, SHON-TAI M. BURTON AND THEIR
2 COUNSEL OF RECORD FOR RESPONDENT:

3
4 PLEASE TAKE NOTICE that the above-caption Accusation Case No. A1 2007 292,
5 filed on July 11, 2008 against ASA DEMOND SAUNDERS is hereby dismissed.

6 DATED: 12/26/08

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9 
10 RICHARD L. WALLINDER
11 Bureau Chief
12 Cemetery and Funeral Bureau
13 Department of Consumer Affairs
14 State of California
15 Complainant

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8 **BEFORE THE**
CEMETERY AND FUNERAL BUREAU
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the Accusation Against:

Case No. A1 2007 292

11 ALL BRASS MEMORIAL CHAPEL,
MICHAEL A. BRASS, JR., OWNER
12 Michael A. Brass, Jr., Owner
11030 S. Willowbrook Avenue
13 Los Angeles, CA 90059

ACCUSATION

14 Funeral Establishment No. FD 1922,

15 KEITH NATHANIEL WARFIELD
11030 South Willowbrook Avenue
16 Los Angeles, CA 90059

17 Funeral Director License No. FDR 2031,

18 and

19 ASA DEMOND SAUNDERS ✓
216 S. Norma Street
20 Ridgecrest, CA 93555

21 Funeral Director No. FDR 2537

22 and

23 SHON-TAI M. BURTON
1712 W. 113th Street
24 Los Angeles, CA 90047

25 Funeral Director No. FDR 3039

26 Respondents.

27
28 Complainant alleges:

1 PARTIES

2 1. Richard L. Wallinder, Jr. (Complainant) brings this Accusation solely in
3 his official capacity as the Bureau Chief of the Cemetery and Funeral Bureau (Bureau),
4 Department of Consumer Affairs.

5 LICENSE HISTORY

6 All Brass Memorial Chapel

7 2. On or about January 9, 2007, the Bureau issued Funeral Establishment
8 License Number FD 1922 to All Brass Memorial Chapel, Michael A. Brass, Jr., Owner
9 (Respondent All Brass). The Funeral Establishment license was in full force and effect at all
10 times relevant to the charges brought herein and will expire on August 16, 2008, unless renewed.

11 Keith Nathaniel Warfield

12 3. On or about November 1, 1999, the Bureau issued Funeral Director
13 License Number FDR 2031 to Keith Nathaniel Warfield (Respondent Warfield). The Funeral
14 Director License expired on November 30, 2007, and has not been renewed.

15 Asa Demond Saunders

16 4. On or about December 29, 2004, the Bureau issued Funeral Director
17 License Number FDR 2537 to Asa Demond Saunders (Respondent Saunders). The Funeral
18 Director license was in full force and effect at all times relevant to the charges brought herein and
19 will expire on December 31, 2008, unless renewed.

20 Shon-Tai M. Burton

21 5. On or about February 15, 2008, the Bureau issued Funeral Director
22 License Number FDR 3039 to Shon-Tai M. Burton (Respondent Burton). The Funeral Director
23 License will expire on February 28, 2009, unless renewed.

24 JURISDICTION

25 6. This Accusation is brought before the Cemetery and Funeral Bureau,
26 under the authority of the following laws. All section references are to the Business and
27 Professions Code unless otherwise indicated.

28 7. Section 7686 of the Code states, in pertinent part, that the bureau may

1 suspend or revoke licenses, after proper notice and hearing to the licensee, if the licensee has
2 been found guilty by the bureau of any of the acts or omissions constituting grounds for
3 disciplinary action. The proceedings under this article shall be conducted in accordance with
4 Chapter 5 of Part 1 of Division 3 of Title 2 of the Government Code, 1 and the bureau shall have
5 all the powers granted therein.

6 8. Section 7692 of the Code, states that misrepresentation or fraud in the
7 conduct of the business or the profession of a funeral director or embalmer constitutes a ground
8 for disciplinary action.

9 9. Section 7707 of the Code provides that “gross negligence, gross
10 incompetence, or unprofessional conduct” in the practice of funeral directing constitutes a ground
11 for disciplinary action.

12 10. Section 7703 of the Code states that violation of any of the provisions of
13 this chapter or of the rules regulations adopted pursuant to this chapter constitutes a ground for
14 disciplinary action.

15 11. California Code of Regulations, Title 16, section 1204 states:

16 (b) The designated managing licensed funeral director of a licensed funeral
17 establishment shall be responsible for exercising such direct supervision and control over the
18 conduct of said funeral establishment as is necessary to ensure full compliance with the Funeral
19 Directors and Embalmers Law, the provisions of this chapter and the applicable provisions of the
20 Health and Safety Code. Failure of the designated managing licensed funeral director and/or the
21 licensed funeral establishment to exercise such supervision or control, or failure of the holder of
22 the funeral establishment license to make such designation shall constitute a ground for
23 disciplinary action.”

24 12. California Code of Regulations, Title 16, section 1223.1(g) states:

25 A licensed funeral establishment may share a preparation and/or storage room
26 with other licensed funeral establishments, upon approval by the Board, under the following
27 conditions:

28 (a) the licensed funeral establishments are under common ownership or have a

1 contractual agreement to share a preparation and/or storage room;

2 (b) the common owners have designated one funeral establishment as the
3 main office as defined in Section 1204(c)(2);

4 (c) the remaining establishment(s) using the facilities of the main office are
5 within a 60 mile radius of the main office;

6 (d) the licensed funeral establishment in which the common storage room is
7 located has designated a separate labeled area within the storage room for each of the
8 establishments using its facilities and has sufficient capacity to accommodate each licensee using
9 the space;

10 (e) An identification and labeling system shall be in place to effectively
11 identify the human remains being prepared and/or stored in the facilities;

12 (f) The facilities meet the requirements as specified in Section 7616 of the
13 Business and Professions Code and have passed inspection by the Board to determine its
14 suitability for shared purposes;

15 (g) A licensed funeral establishment requesting permission from the Board to
16 share their preparation and/or storage room, must make a request, in writing, on a form 21F-12
17 (4/93) provided by the Board. An inspection will then be scheduled and completed to ensure that
18 the above mentioned conditions have been met before the establishment can begin sharing its
19 facilities.

20 13. Section 118, subdivision (b), of the Code provides that the expiration of a
21 license shall not deprive the Bureau of jurisdiction to proceed with a disciplinary action during
22 the period within which the license may be renewed, restored, reissued or reinstated.

23 14. Section 125.3, subdivision (a), states, in pertinent part: "Except as
24 otherwise provided by law, in any order issued in resolution of a disciplinary proceeding before
25 any board within the department . . . upon request of the entity bringing the proceedings may
26 request the administrative law judge may direct a licentiate found to have committed a violation
27 or violations of the licensing act to pay a sum not to exceed the reasonable costs of the
28 investigation and enforcement of the case."

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5 FIRST CAUSE FOR DISCIPLINE

6 (Fraud)

7 15. Respondent All Brass Memorial Chapel is subject to disciplinary action
8 under sections 7686 and 7692 of the Code, for unprofessional conduct in that Respondent All
9 Brass committed fraud in the following respects:

10 a. Between approximately January 2007 through June 2007, Respondent All
11 Brass charged consumers for embalming without having a Bureau approved storage and
12 embalming facility.

13 b. Between approximately January 2007 through June 2007, Respondent All
14 Brass made misrepresentations on the Authorization for Disposition With or Without Embalming
15 form in connection with the preparation and/or cold storage for multiple decedents.

16 c. Between approximately January 2007 through June 2007, Respondent All
17 Brass overcharged consumers for certain services than what was stated on the General Price List
18 (GPL), including but not limited to, charging the families of two decedents \$350 for a viewing
19 that the GPL stated was only \$175.

20 d. Between approximately January 2007 through June 2007, Respondent All
21 Brass charged decedent families for embalming services and "other preparation of remains",
22 which merely refers to bathing after embalming, an essential component of the embalming
23 process.

24 SECOND CAUSE FOR DISCIPLINE

25 (Unauthorized Use of Preparation/Storage Room)

26 16. Respondent All Brass Memorial Chapel is subject to disciplinary action
27 under Section 7703 of the Code, in conjunction with California Code of Regulations section
28 1223.1(g), in that between February 2007 through June 2007 Respondent charged consumers for

1 preparation/embalming services without having a Bureau approved embalming facility. The
2 circumstances are as follows:

3 a. On or about February 5, 2007, Respondent All Brass lost the contract and
4 was no longer approved to use the cold storage and preparation facility at Bureau approved
5 Eternal Rest Mortuary Directors.

6 b. Thereafter, the Bureau advised Respondent All Brass that a new facility
7 must be approved by the Bureau before preparation and embalming services could be offered to
8 consumers.

9 c. Between February 2007 through June 2007, Respondent continued to
10 perform preparation and embalming services for multiple decedents without having a Bureau
11 approved embalming facility.

12 d. To date, Respondent All Brass Memorial Chapel continues to operate
13 without having a Bureau approved preparation and storage facility.

14 THIRD CAUSE FOR DISCIPLINE

15 (Unprofessional Conduct)

16 17. Respondents All Brass Memorial Chapel, Warfield, Saunders, and Burton
17 are subject to disciplinary action under section 7707 of the Code, for unprofessional conduct, as
18 set forth more fully in paragraphs 15 and 16, above.

19 FOURTH CAUSE FOR DISCIPLINE

20 (Failure to Ensure Compliance with Laws and Regulations)

21 18. Respondents All Brass Memorial Chapel, Warfield, Saunders and Burton
22 are subject to disciplinary action under section 7703 of the Code, in conjunction with California
23 Code of Regulations section 1204(b), in that on or about November 15, 2007, a Bureau
24 investigation revealed that Respondents failed to ensure compliance with the Funeral Directors
25 and Embalmers Law and the regulations adopted thereunder, as set forth more fully in paragraphs
26 15 and 16, above.

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6 PRIOR VIOLATIONS

7 19. On or about October 5, 2007, the Bureau issued Citation No. IC 2007 91
8 to Respondent All Brass, for violations of Code sections 7707 and 7616(a)¹, and California Code
9 of Regulations sections 1214(b)², 1223.1(g) and 1258.1(c)(1)(b)³. No fine was assessed.

10 20. On or about December 28, 2007, the Bureau issued Citation No. IC 2007
11 117 to Respondent All Brass for violations of Code section 7692 and California Code of
12 Regulations Sections 1204(b) and 1223.1(g). A fine in the amount of \$2,003.00 was assessed.
13 The citation was paid on March 18, 2008.

14 PRAYER

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

- 17 1. Revoking or suspending Funeral Establishment License Number FD 1922,
18 issued to All Brass Memorial Chapel, Michael A. Brass, Jr., Owner.
- 19 2. Revoking or suspending Funeral Director License Number FDR 2031,
20 issued to Keith Nathaniel Warfield.
- 21 3. Revoking or suspending Funeral Director Number FDR 2537, issued to
22 Asa Demond Saunders.

24 1. Section 7616, subdivision (a) of the Code, requires that a funeral establishment maintain
25 a suitable room for the storage of decedents.

26 2. California Code of Regulations Section 1214, subdivision (b), sets forth the
27 requirements for the Authorization for Disposition with and Without Embalming form.

28 3. Section 1258.1, subdivision (c)(1)(b) of the Code, provides that a funeral establishment
must include a clear statement regarding the price ranges for all caskets.

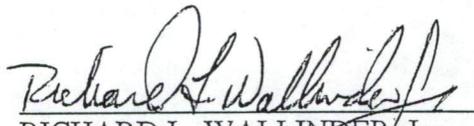
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4. Revoking or suspending Funeral Director Number FDR 3039, issued to Shon-Tai Burton.

5. Ordering All Brass Memorial Chapel, Keith Nathaniel Warfield, Asa Demond Saunders, and Shon-Tai Burton to pay the Cemetery and Funeral Bureau the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

6. Taking such other and further action as deemed necessary and proper.

DATED: 7/11/08


RICHARD L. WALLINDER, Jr.
Bureau Chief
Cemetery and Funeral Bureau
Department of Consumer Affairs
State of California
Complainant

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All Brass Accusation.wpd