

NEW MOTOR VEHICLE BOARD  
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STATE OF CALIFORNIA  
NEW MOTOR VEHICLE BOARD

In the Matter of the Protest of )  
BUENA PARK HYUNDAI, ) Protest No. PR-1124-89  
 )  
Protestant, ) DECISION  
 )  
vs. )  
 )  
HYUNDAI MOTOR AMERICA, )  
 )  
Respondent. )  
\_\_\_\_\_ )

PROCEDURAL BACKGROUND

1. By letter dated August 15, 1989,<sup>1/</sup> Hyundai Motor America ("HMA"), 7373 Hunt Avenue, Garden Grove, California, gave notice pursuant to California Vehicle Code section 3062<sup>2/</sup> to Buena Park Hyundai ("BP") of its intention to establish a Hyundai dealership at 18201 Studebaker Road, Cerritos, California ("LaMar"), in the Cerritos Auto Mall.

2. A protest was filed with the Board on behalf of BP on August 31.

3. The hearing was conducted on November 6, 7, 8, 13, 14, 21, 29 and 30 before Matthew Goldberg, an Administrative Law Judge for the Board.

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1. All dates refer to 1989 unless otherwise noted.
  2. Statutory references are to the California Vehicle Code.

4. HMA was represented by Maurice Sanchez, Esq., 7373 Hunt Avenue, Garden Grove, California 92642.

5. BP was represented by Michael Miller, Esq., of Pilot, Spar & Siegler, 1801 Avenue of the Stars, Suite 1120, Los Angeles, California 90067.

6. The Board, at its meeting on March 29, 1990, rejected the Proposed Decision.

#### ISSUES PRESENTED

7. BP contends that there is good cause for not allowing the establishment of the LaMar dealership for the following reasons:<sup>3/</sup>

a. Protestant's investment is permanent and will be adversely affected {section 3063(a)};

b. The establishment will have an adverse effect on the retail motor vehicle business and the consuming public in the relevant market area {section 3063(b)};

c. The establishment will be injurious to the public welfare {section 3063(c)};

d. The current Hyundai franchisees in the relevant market area are providing adequate competition and convenient consumer care for the owners of Hyundai vehicles in the market area, including adequate motor vehicle sales and service facilities, equipment, supply of vehicle parts, and qualified service personnel {section 3063(d)}; and

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3. Section 3066 provides that BP has the burden of proving that there is good cause not to enter a franchise establishing an additional motor vehicle dealership.

e. The establishment of an additional franchise would not increase competition and therefore will not be in the public interest {section 3063(e)}.

#### FINDINGS OF FACT

##### Facts Relating to the Permanency of Investment ... {Section 3063(a)}

8. BP, a corporation, is owned by Aaron ("Arlie") Sherman (50%), Gary Rappaport (25%), and Frank Triestman (25%). They are partners in RST & Associates ("RST"). RST owns the land on which BP is located, 6692 Manchester Boulevard, Buena Park.

9. BP and EMA executed a Letter of Intent ("LOI")<sup>4/</sup> on October 23, 1985 and BP began operations on August 7, 1986. BP was one of 125 dealers established in the first year that Hyundais were sold in the United States.

10. BP was established in an area that had been designated by HMA as an open point.<sup>5/</sup>

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4. A Letter of Intent is an HMA commitment to award a franchise to a qualified dealer applicant who agrees to establish Hyundai representation with a particular facility within a designated period of time.

5. In March, 1985, HMA selected its initial open points on the basis of the following criteria: visibility and access from a major thoroughfare; proximity to other major import dealerships; proximity to a shopping mall; and in an area of increasing population growth. While BP was not near a shopping mall, it satisfied the remaining requirements. Dealers installed during the first year were targeted for large and promising markets which presented the greatest sales opportunities for HMA and the dealership. Typically, they were located only in metropolitan areas.

11. As a condition to receipt of the franchise, it was necessary for BP to meet HMA's facility requirements, as well as HMA's working capitol and flooring requirements. HMA required that dealers have stand-alone exclusive facilities for Hyundai.

12. The initial planning guide<sup>6/</sup> assigned to BP by HMA was 900 units which required a total building space of 14,584 square feet. HMA revised the guide to 1,300 units and the space requirements were thereby increased to 18,880 square feet. BP built a facility containing 21,468 square feet in anticipation of projected increases in sales.

13. The partners of RST (who are the shareholders of BP) purchased the land and constructed the facilities at a total cost of \$3.8 million dollars.

14. It is not possible for RST to recoup its investment by selling its real estate. The land was acquired at a cost of \$20 per square foot. The City of Buena Park is selling land adjacent to BP's location for \$7 per square foot, and the nearby community of La Mirada is selling land for between \$5 and \$7 per square foot. Additionally, the land is subject to a conditional use permit from the city, which restricts its use to the operation of an automobile franchise. The land cannot be used for another purpose without a zoning change.

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6. "Planning guide" is a figure generated by HMA to represent average registrations in a given geographic area at some future time, and connotes dealer opportunity for that area, taking into account population and demographics. It is not a sales projection, but rather is utilized to determine facility size and required investment.

15. The three BP shareholders invested approximately \$500,000 in initial working capital in proportion to their ownership interests. They have since supplied an additional \$240,000 in cash for a total of about \$740,000. No distributions have been made to the shareholders since BP began operations.<sup>7/</sup>

16. The land was leased by the partnership to the corporation for a term of 21 years which commenced on June 1, 1986. The rent is to be paid monthly in an amount equal to the principal and interest paid by the partnership on the debt incurred to acquire the land and construct the facilities. No specific rent amounts are stated in the lease. The lease also provides that the rent may be adjusted at any time after the 12th month by agreement of the parties. The rent has not been adjusted, and RST has not taken any funds out of the investment in the property.

17. Attempts by Sherman to obtain another franchise to replace Hyundai have been unsuccessful. BP is to be appointed a Suzuki dealer but Suzuki sales will not be sufficient to sustain operations.

18. Sherman, who has a highly active role in running BP, also owns a dealership ("UseM") in Austin, Minnesota, a

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7. BP financial statements show net after income tax profits of \$75,652 in 1986; net losses of \$113,529 in 1987, principally due to a year-end LIFO adjustment; \$50,833 profits in 1988; and year-to-date losses, as of September 30, of \$216,580 for 1989.

non-metro market.<sup>8/</sup> He has been associated with Usem since 1958. That dealership has never lost money, has had a better-than-average share of the market, and has had a consistently high consumer satisfaction index ("CSI").

19. Donald LaMar (the proposed new HMA franchisee) has been in the automobile business since 1962, having begun his career as a salesman. He first became a dealer in 1973. At present, he owns Moothart Chrysler-Plymouth in Lakewood, Whittier Chrysler-Plymouth and Whittier Dodge. Both Whittier dealerships are in the process of being sold. The Moothart dealership will be relocated to Cerritos, where it will operate out of a facility combined with the Hyundai franchise at issue, as detailed below. Mr. LaMar's dealerships have received quality service awards on a number of occasions, and have high CSI levels and "loyalty factors," meaning repeat sales business.

20. Mr. LaMar applied for a Hyundai dealership in June 1989. A LOI was issued to him by HMA on July 29, 1989.

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8. Usem contains Chevrolet, Cadillac, Oldsmobile, Buick, GMC Truck, Pontiac and Subaru franchises. His family has operated the dealership since it was first established in 1923. Sherman had also owned other dealerships in Minnesota.

21. The proposed LaMar facility will house two separate showrooms of about 3,500 square feet each, one for Hyundai and the other for Chrysler/Plymouth.<sup>9/</sup> The total building size is 79,000 square feet. It contains 44 service stalls. There will be separate signage and separate sales and finance and insurance staffs for the two franchises, although there will be common parts, service and storage areas. The portion dedicated to Hyundai meets HMA's facility requirements which call for 17,500 square feet of total building space for 1,200 units and 2.4 acres of land. The total land area of the entire facility, including 122 parking spaces, will be approximately seven acres. LaMar's projected Hyundai sales are 1,200 vehicles per year.

22. Mr. LaMar will have invested about \$7 million in the total facility, including land and buildings.<sup>10/</sup> Construction costs equal about \$28 per square foot.

23. Hyundai sales nationally declined 30% in the first nine months of 1989, compared with 1988. National sales estimates for 1989 have been adjusted to about 185,000 for the calendar

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9. HMA revised its franchise requirements in early 1989, relaxing the exclusivity requirement. It now permits Hyundai to share parts and service facilities with other line-makes, principally in major metropolitan areas that have a lower planning guide. Currently under consideration is a review of HMA's policy which presently prohibits the operation of a dual facility in those areas.

10. LaMar's land purchase was facilitated by a government subsidy.

year, down from an original expectation of 300,000 units.

24. 1989 sales in the HMA Western Region have declined about 40% compared to 1988. Regional sales for 1989 were originally estimated to be about 88,000 units. Current estimates run between 50,000 and 55,000 units for 1989.

25. Hyundai, along with the industry in general, has experienced a decline in sales. However, Hyundai's decline has been not only in sales but also in market share. Hyundai's market penetration at the national level declined from 2.3% or 2.5% of total industry for the first 8 months of 1988 to 1.6% or 1.8% of total industry for the first 8 months of 1989. This decline of .7% in market share is a loss of 30% or 28% of the market share Hyundai had enjoyed in 1988. For the Western Region (comprised of six districts), Hyundai's market share of total industry, subcompact and lower middle vehicles, has been as follows:

1987	1988	1989
4.9%	4.3%	2.6%

This represents a decline of 12% of the market share between 1987 and 1988 and an additional 40% decline in market share between 1988 and 1989 for a 47% decline from 1987 to 1989.<sup>11/</sup>

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11. The figures, gathered by R. L. Polk and Company, represent year-to-date through August for each of the years noted.

26. The numbers below reflect state-wide Hyundai sales per month versus all Asian imports:<sup>12/</sup>

	Hyundai	%Change From Prior Year Same Month	All Asian Import Cars	%Change
Oct. 1988	4,612	-22.0%	N/A	6.9%
Nov.	4,219	-24.1%	N/A	-2.2%
Dec.	4,059	-15.8%	40,486	-4.2%
Jan. 1989	3,748	-19.0%	38,927	-4.5%
Feb.	3,467	-31.0%	36,509	-14.2%
Mar.	3,301	-41.8%	36,362	-16.6%
Apr.	3,289	-44.9%	36,321	-15.8%
May	3,508	-40.7%	39,722	-3.3%
June	3,327	-41.6%	40,336	-1.1%
July	2,733	-43.9%	55,636	1.4%
Aug.	2,166		65,846	
Sept.	1,808		50,050	

27. The above chart shows a decline in Hyundai's sales from 4,612 in October 1988 to 1,808 in September 1989, a loss of 2,804 sales (-60%). The sale of other Asian import cars increased from 40,486 in December 1988 to 50,050 in September 1989, an increase of 9,504 (+23%). Hyundai sales declined by 60% but, despite Hyundai's decline, Asian import sales increased by 23%.

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12. For the period from October, 1988 through June 1989, the car sales figures are based on the average number of registrations within a rolling 90-day period. For the three months following, the sales figures are based on sales numbers reported each month by the manufacturer.

28. The following are HMA's percentage of total Asian import sales:

<u>Month</u>	<u>HMA % of Total Asian Sales</u>
Dec. 1988	10.03%
Jan. 1989	9.63%
Feb. 1989	9.50%
March 1989	9.08%
April 1989	9.06%
May 1989	8.83%
June 1989	8.25%
July 1989	4.94%
Aug. 1989	3.29%
Sept. 1989	3.61%

29. The following are the percentages of increases or decreases in registrations of Asian imports in California for the first 8 months of 1989 as compared to the same period in 1988:

Honda:	+1.9%
Toyota:	+1.5%
Nissan:	-1.5%
Hyundai:	-41.4%

30. BP is in District 2 of HMA's Western Region. This includes Los Angeles County and part of San Bernardino and Riverside Counties. LaMar would be in District 1, which consists of Orange and San Diego Counties. The following chart depicts the decline in Hyundai sales in District 1 on a per month basis:

	<u>District 1</u>	
	1988	1989
Jan.	2242	1220
Feb.	2302	1290
March	2435	1950
April	2362	1352
May	2068	1073
June	2363	891
July	1630	641
Aug.	2278	1194
Sept.	<u>1730</u>	<u>785</u>
Totals:	19,410	10,396

The following chart depicts the decline in Hyundai sales in District 2 on a per month basis:

	<u>District 2</u>	
	1988	1989
Jan.	1424	952
Feb.	1266	905
March	1658	1296
April	1647	884
May	1587	804
June	1501	755
July	1086	523
Aug.	1489	1033
Sept.	<u>1115</u>	<u>579</u>
Totals:	12,773	7,731

31. The chart below reflects 1989 year-to-date sales through October for dealerships in Districts 1 and 2 of the HMA Western Region:

District 1

Name	City	1988 YTD Thru Oct	1989 YTD Thru Oct
Century	Alhambra	1448	489
Cormier	Long Beach	2793	1890
Cerritos	Cerritos	1139	Closed
Tate	Claremont	1854	790
Albertson	Culver City	856	580
Kim Hankey	Los Angeles	2574	1532
Savage	Monrovia	1859	1077
Santa Monica	Santa Monica	665	217
Torrance	Torrance	1656	528
Galpin	Sepulveda	2271	1314
Southgate	Southgate	1522	Closed
Modern Motors	Glendale	1590	Closed; replaced 9/89
Pioneer	No. Hollywood	631	794

District 2

Name	City	1988 YTD Thru Oct	1989 YTD Thru Oct
Buena Park	Buena Park	1236	787
Harbour	Costa Mesa	942	429
Drew	La Mesa	1187	696
Escondido	Escondido	2166	Closed
Garden Grove	Garden Grove	1361	1131
Holmes Tuttle	Irvine	1020	543
Frank	National City	1005	696
Quaid	Riverside	802	592
Cush	San Diego	1262	844
Tom Flores	San Bernardino	1424	585
Desert	Cathedral City	374	201
Morrison	Santa Ana	28	229

BP sales, as shown above, are down 36% from the prior year. More than half of the dealers listed had sales declines of greater percentages. Accordingly, BP sales performance over the past year has been better than half of the dealers in the two districts. Of the 38 dealers remaining in operation in 1989,

excluding Tate,<sup>16/</sup> 20 had sales performances which were worse than BP in 1989.

32. HMA officials were critical of BP advertising strategies, sales motivational techniques, experience and qualification levels of its managers, and its systems for monitoring traffic counts to maximize sales opportunities. However, while sales per outlet averages have declined since March, 1988, in the district, region, and nation, BP sales have remained, for the most part, above these averages. Its sales effectiveness is therefore at comparably adequate levels. BP has won every HMA sales contest it has entered.

33. The thirteen dealers in EP's district have lost an average of \$164,878 per dealer, year-to-date through August, 1989. Only two of the thirteen have shown a profit for the period. The greatest loss sustained by a particular dealer was over \$500,000; the least, about \$50,000.<sup>17/</sup>

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16. Tate underwent a change in ownership. A change in dealer code was also made. Therefore the sales figures on the exhibit for that dealership were inaccurate.

17. Dealers typically try to shelter profits, but no one tries to shelter losses. The figures for year-to-date losses did not take into account year-end adjustments which would further increase them, such as LIFO, equipment purchases, and charitable contributions.

34. The decline in Hyundai sales has been attributed to a general market decline; the lack of a new product;<sup>18/</sup> the poor creditworthiness of Hyundai customers making it difficult for them to obtain financing;<sup>19/</sup> and the low resale value of the car. HMA's marketing problems have also stemmed from the fact that their car originally occupied a particular niche in the market, with its low price, where there was no competition. Rather than concentrate on that market, Hyundais became more expensive, thus putting them in direct competition with the Japanese imports.

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18. The same basic model (the Excel) has been marketed since 1986, and should have been replaced. When the Sonata was introduced in early 1989, six months behind schedule, it displayed certain mechanical problems. The model was designed to compete with the Honda Accord. Sonata sales have been roughly one-fourth of projections.

19. Hyundai customers are generally low-income or first-time buyers, and defaults are common. Financing for flooring is also not easily available for Hyundai dealers.

Facts Pertaining to the Effect on the Retail Motor  
Vehicle Business and the Consuming Public  
in the Relevant Market Area  
{Section 3063(b)}

35. Currently, there are two operational Hyundai dealers within the relevant market: BP and Carson. BP is 6.5 air miles from LaMar, while Carson is 8.9. Open points exist in Downey (6.5 miles), Long Beach (6.0 miles) and Whittier (8.2 miles).

36. The Cerritos Auto Mall, which has a large number of dealerships adjacent to one another on both sides of the street, is one of the most successful in the Los Angeles basin, if not in the nation.

37. Hyundai had been represented at the Cerritos Auto Mall from October 1986 until May 1989, when Cerritos Hyundai ("CH") voluntarily terminated its franchise. CH had sold over 5,000 units in the 34 months of its existence.

38. CH failed due to business considerations not necessarily related to a declining sales volume. The facility was constructed on expensive land and had a high rent factor. It was constructed beyond EMA's planning guide requirements, and had a substantial overhead. Litigation between its partners contributed to expenses which were unusual for the retail car business. CH sold vehicles with full recourse paper, a management financing practice which led to losses for the dealership.

39. The proposed LaMar facility is directly across the street from the former CH location, a distance of about 200 feet.

40. No formal study was performed by HMA regarding the impact on BP if LaMar is established. The drastic decline in Hyundai sales was not considered by HMA in deciding whether to award the LaMar franchise, and HMA has no policy regarding the filling of open points in a down market.

41. Hyundai dealers nationwide, on the average, have been losing money since September, 1988. The losses are more extreme in the Western Region.

42. BP's losses for the year through September, 1989 have equalled about \$24,000 per month. Carrying costs (those which remain whether the business operates or not) include debt service on the mortgage, and costs for maintenance for the building, land, and facilities, and security. These total about \$30-35,000 per month. The BP shareholders have determined that should losses dramatically exceed carrying costs for any period of time, they will cease operations.

43. BP sold 789 cars for the first 10 months of 1989. The break-even point for BP is about 100 cars per month. Increases in BP's service business are not sufficient to offset the decline in new car sales.

44. Comparing 1989 monthly parts and service gross profits of BP before and after CH terminated, BP would lose between \$15-20,000 per month in parts and service gross profits as a result of the establishment of a franchise in Cerritos.

45. Given an average of \$1500 gross profit per car sold, if ten sales per month were lost to the LaMar dealership, BP would be deprived of \$15,000 per month; if 20 sales were lost, the figure would be doubled. Combined with the estimated loss of parts and service business, the amount of gross profits lost to the new franchise would be greater than \$40,000 per month. A loss of revenue at these levels would put BP out of business.

46. HMA is currently subsidizing purchases with between \$1500 and \$2000 per car. If the subsidy is halted, single point dealerships would be virtually eliminated. There is no guarantee from HMA that the subsidies will continue.

47. Should BP go out of business, the most direct impact will be felt by the shareholders who will lose their business and investment. The BP employees will lose their jobs. It will also disrupt the consumers who come to BP for service.

48. Leon Peskin has been in the automobile business for 35 years, and has operated a number of highly profitable franchises. Peskin owns or has owned three Hyundai franchises in the L.A. Metro/Orange County market: Century (Alhambra); Santa Ana;<sup>20/</sup> and Tom Flores Hyundai (San Bernardino). Declining sales have led to substantial losses in the operation of each. The closest competitor to Century was a Glendale

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29. Santa Ana Hyundai was closed in the fall of 1989.

dealership which closed in May, 1989. After the closure, Century's sales and service business increased, although new car sales were still below levels necessary to meet overhead. When a Glendale dealership was re-established in August, Century sales went from 88 that month to 35 in October. Based on his experience, Peskin predicted that BP would lose about 30% of its new car sales, and that percentage or greater of its service business, should LaMar be established.

49. BP had slight profits in the beginning of 1987, followed by significant losses in the last half of that year. BP was profitable through August, 1988, lost money in September and October, was profitable again in November, then lost money in December and lost money every month through August, 1989.

Facts Pertaining to the Injury to the Public Welfare  
{Section 3063(c)}

50. The public welfare will not be served by establishing an additional dealership if the result will cause an existing dealer to cease operations. The facts set forth above evidence that BP will cease operations if it does not become profitable and that establishment of LaMar will significantly lessen or eliminate BP's opportunities of becoming profitable.

Facts Relating to Whether the Franchisees of the  
Same Line-Make in That Relevant Market Area Are  
Providing Adequate Competition and Convenient  
Consumer Care for the Motor Vehicles of the Line-Make  
in the Market Area Which Shall Include the Adequacy  
of Motor Vehicle Sales and Service Facilities,  
Equipment, Supply of Vehicle Parts,  
and Qualified Service Personnel  
{Section 3063(d)}

51. Driving times and distances between LaMar and BP vary according to the route. Using freeways 605 and 91, it takes 14

minutes to travel the 10.7 miles between the dealerships. Using one route along city streets the distance is 8.1 miles, and the time 22 minutes; another route along surface streets takes 15 minutes to travel 7.0 miles. The drive times were measured for mid-day travel.<sup>21/</sup>

52. There are no customers in the relevant market area ("RMA") who are not within ten miles of at least one existing Hyundai dealer. These existing dealers are able to provide service and honor the HMA warranty. Some portions of the RMA are "covered" in a sense, by two or more dealers.<sup>22/</sup>

53. Although BP's CSI is currently below the regional average, its service department has recently achieved the highest CSI in Orange County, and over the past two years, has either been rated number one or number two.

54. Donald Hart has been the service director for BP since November of 1987. When he first came to BP, the service department did not have a service manager, there was employee turnover, and good controls were not being kept. During his tenure, however, Hart has steadily improved the efficiency and level of expertise of his department. In 1987, there were only two properly-schooled, factory-trained Hyundai mechanics who

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21. Using city streets, driving distance between BP and Lamar is 6.7 miles. The mid-point between the two dealerships would therefore be only 3.35 miles. The freeway route is a distance of 8.6 miles. At 2 p.m., the trip along the streets takes about 16.5 minutes; on the freeway, it takes 12 minutes.

22. For example, areas in the northwest quadrant of the ten-mile circle around Cerritos are within ten miles of Cormier (Carson), Albertson (Culver City), Kim Hankey (Los Angeles), and Torrance. The area immediately south of the proposed dealership is within ten miles of BP, Garden Grove and Cormier.

worked at desired productivity levels, and a third who had not yet attained a desired level of proficiency. Presently, there are eight technicians employed. BP technicians have been enrolled in factory training because competent Hyundai mechanics are unavailable from the general labor pool.

55. HMA classifies technicians as "master", "expert" and "certified" in decreasing levels of skill. There are only seven master technicians in the entire western region of HMA. One is employed at BP. BP also employs two of the nine expert technicians in the region. One of the experts is soon to become a master and BP will then be the only franchisee with that quality of expertise in its service department.

56. In addition to its well-equipped service department, BP has installed its own water purification system, which enables it to wash more cars per hour. BP has installed a brake lathe, computer tire balancers, and a "Corgy" tire changer, one of the only such machines in the area. BP is also a smog certification station, and has a smog technician available at all times. BP is the only Hyundai franchisee in Southern California which operates a full service shift on Saturdays.

57. Hart has been recognized as one of the leading service managers in the Western Region, having received the number 2 ranking out of 44 in the HMA Council of Excellence. Rankings are determined according to such criteria as dollar amounts for warranty work, customer follow-up, speed, efficiency, cleanliness, etc.

Facts Pertaining to Whether the Establishment of an  
Additional Franchise Would Increase Competition  
and Therefore Be In the Public Interest  
{Section 3063(e)}

58. Demand for Hyundai products has declined to the point that existing dealers are not profitable. Establishing an additional dealership under these circumstances will not increase competition. The establishment of LaMar would result in the loss of BP.

Determination of Issues

The Protestant has proven that there is good cause for not establishing the additional franchise in the Cerritos Auto mall in that:

1. Protestant has proven that its investment is permanent. Protestant has proven that the establishment of the proposed dealership will substantially jeopardize its investment {section 3063(a)};

2. Protestant has proven that the establishment will have an adverse effect on the retail motor vehicle business and the consuming public in the relevant market area {section 3063(b)};

3. Protestant has proven that the establishment will be injurious to the public welfare {section 3063(c)};

4. Protestant has proven that there is adequate competition and convenient consumer care for owners of Hyundai vehicles in the relevant market area, including adequate motor vehicle sales and service facilities, equipment, supply of vehicle parts and qualified service personnel {section 3063(d)};  
and

5. Protestant has proven that the establishment would not increase competition, and therefore would not be in the public interest {section 3063(e)}.

Decision

The protest is sustained. HMA is not permitted to establish an additional dealership at 18201 Studebaker Road, Cerritos, California.

DATED:

4-3-90

By

Robert J. Beckus

ROBERT J. BECKUS  
Board Member  
New Motor Vehicle Board