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7
8 Attorneys for Plaintiff DANIEL CHAFFIN,
an individual

9
10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF ORANGE**

12 DANIEL CHAFFIN, individually and on
13 behalf of all others similarly situated,

14 Plaintiff,

15 v.

16 SOCAL SUPERBIKES, a California
17 corporation; ALEXANDER JASON
QUINTERO, an individual, JORGE LUIS
18 GONZALEZ, an individual, JAZMINE
GONZALEZ QUINTERO, an individual,
19 ERIK MORA, an individual, and DOES 1
20 through 25, inclusive,

21 Defendants.
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CASE NO. 30-2025-01532976-CU-FR-CXC

**DECLARATION OF KEVIN D. CHAFFIN
IN SUPPORT OF MOTION FOR COURT
APPROVAL OF LIMITED NOTICE TO
CONSUMERS AND PUTATIVE CLASS
MEMBERS**

Date: Mondays, 2026
Time: 9:00 a.m.
Dept.: CX103

Assigned for All Purposes to:
The Honorable Lon Hurwitz

[Filed Concurrently with Motion for Court
Approval of Limited Notice to Consumers and
Putative Consumer Class Members]

[Filed Concurrently with [Proposed] Order]

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I, Kevin D. Chaffin, declare:

1. I am an attorney licensed to practice before all Courts of the State of California. I am counsel of record for Plaintiff in this action. Prior to establishing my own practice on January 1, 2026 of this year, I served as Senior Trial Attorney and Head of Employment Arbitration for Bibiyan Law Group PC, one of the largest Wage and Hour and Class Action law firms in the State of California. I have been a practicing attorney in California Since December of 1997, with experience in Jury Trials, Bench Trial and Arbitrations in cases involving business, employment, injury and mass torts. I served as General Counsel for The Shyft Group, Inc. (NASDAQ: SHYF) during the years 2020-2021.

2. I am personally familiar with the facts set forth in this declaration based on my own first hand knowledge, except as to matters stated on information and belief, and as to those matters, I believe them to be true. If called to testify to the contents of this declaration, I could and would competently testify.

PATTERN OF DECEPTION AND REGULATORY VIOLATIONS

3. Defendants' illegal operations began with their incorporation on May 13, 2020, and continued through their eviction in March 2026, encompassing nearly six years of unlicensed operations targeting California motorcycle riders. The Bureau of Automotive Repair (“BAR”) issued Citation on August 9, 2022, explicitly ordering Defendants to "cease all work which requires a valid registration." A true and correct copy of that BAR Citation is attached as **Exhibit A**. Defendants willfully continued operating for an additional three years and four months until receiving a second citation with Order of Abatement on December 10, 2025. A true and correct copy of that BAR Citation is attached as **Exhibit B**.

4. When Defendants finally obtained a Garden Grove business license, they listed their business type as "**Bike Sales & Service**" rather than "motorcycle repair shop" to evade regulatory oversight. A true and correct copy of Defendants’ business license is attached as **Exhibit C**. After being served with this Complaint, Defendants attempted to evade liability by filing fraudulent Statements of

1 Information with the California Secretary of State and by posting false advertising on their website
2 claiming they were "CLOSED FOR SPRING BREAK" when they had actually been evicted by their
3 landlord, David Soleymani of Garden Grove Gardens LLC. True and correct copies of text messages
4 and photographs of the posted notice of eviction are attached as **Exhibit D**. The photographs depict
5 the former location of SoCal SuperBikes post-eviction, with cleaning supplies and a mop-bucket.
6 Attached here with as **Exhibit E** is a true and correct copy of a screenshot of Defendants' post-eviction
7 webpage notice falsely claiming that they were "Closed for Spring Break."

8 5. Defendants were properly provided and received 30-Day notices, pursuant to California Civil
9 Code §1782, to correct their numerous legal violations and consumer fraud practices, on September
10 25, 2025. Defendants were mailed copies of the §1782 notice again on October 2, 2025. Defendants
11 retained an attorney short-term, who was provided with a response citing California BAR search
12 results, California DMV search results, Defendants' website false advertising examples, and text
13 messages from Defendants illegally threatening \$100/day storage fees, and citing Defendants' selling
14 of merchandise with no CDTFA seller's permit. No further responses disputing any of those facts
15 were ever received from Defendants. A true and correct copy of that letter exchange to
16 Defendants' and their attorney is attached as **Exhibit F**.

17 6. Defendants' website listed motorcycles for sale, but Defendants did not have the required
18 California Department of Motor Vehicles Dealer Licensing. Defendants' website listed motorcycle
19 accessories for sale, but Defendants did not have the required Sales Tax Permit. California Public
20 Records Act Requests issued to City of Garden Grove Police Department, Fire Department and
21 Orange County revealed that Defendants also failed to file Hazardous Waste Disposal plans as
22 required by ordinance and law.

23 7. Although Defendants' first citation by the California BAR was issued to Defendant Alexander
24 Jason Quintero and SoCal SuperBikes, and Defendants' June 2025 Statement of Information listed
25 Mr. Quintero as Officer of SoCal SuperBikes, Mr. Quintero left a voicemail message after service of
26 this lawsuit claiming that he had no knowledge of why he was being sued, then claiming he had not
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1 been involved in the SoCal SuperBikes business for years. Recently, Defendants double-filed
2 Statements of Information removing Alexander Jason Quintero and Jazmine Gonzalez Quintero as
3 officers, leaving Defendant Jorge Luis Gonzales to appear as the sole officer.

4 8. After this lawsuit was filed, Defendants went to extensive efforts to evade service. Defendant
5 Jorge Luis Gonzalez disappeared from the SoCal SuperBikes shop in Garden Grove, with a temporary
6 stand-in claiming Mr. Gonzalez was on vacation for a month. In Texas, Defendant Alexander Jason
7 Quintero attempted to evade service by running away from the female process server who was calling
8 out his name, and jumping in his truck to speed away. A true and correct copy of the Proof of Service
9 on Defendant Quintero is attached as **Exhibit G**.

10 **Specific Endangerment of Plaintiff and California Motorcycle Riders**

11 9. **Specific Endangerment of Plaintiff Through Unsafe Repairs and Illegal Threats.**
12 Plaintiff Daniel Chaffin entrusted his 2000 Suzuki Hayabusa GSX1300R motorcycle to Defendants,
13 a machine that holds the distinction of being the original superbike so fast it resulted in an international
14 agreement among manufacturers to limit motorcycle speeds after European regulators threatened
15 import bans due to the Hayabusa's unprecedented 194 mph capability.¹ Defendants' text messages
16 confirm they performed unauthorized work on this legendary motorcycle, ultimately returning it with
17 bent forks since replacement forks were unavailable, and that they had "rebuilt the [bent] fork seals"
18 and the work was "complete." A true and correct copy of text messages from Defendants are attached
19 as **Exhibit H. When questioned about these obvious inconsistencies, Defendants threatened**
20 **illegal \$100-per-day storage fees, a practice that unlicensed operators cannot lawfully impose**
21 **under California law. (Exhibit H.)** Defendants' claim that they "forks are no longer available" for a
22 2000 Suzuki Hayabusa is patently ridiculous given the motorcycle's popularity and extensive
23 aftermarket support, revealing their complete lack of competence and willingness to return a safety-

24 ¹ The 1999 Suzuki GSX1300R Hayabusa immediately won acclaim as the world's fastest production
25 motorcycle with a top speed of 194 mph, prompting fears of European regulatory backlash that led to an
26 informal "gentlemen's agreement" among Japanese and European manufacturers to limit motorcycle speeds to
27 186 mph starting in 2000. http://en.wikipedia.org/wiki/Suzuki_Hayabusa. The speed wars era ended with the
Hayabusa, making unrestricted 1999-2000 models particularly valuable among collectors and enthusiasts.

critical motorcycle component in damaged condition rather than obtain proper parts. Defendants failed to provide any warranty information or manufacturer specifications for alleged engine components they claimed to have installed, including an oil pump, and refused to provide required written estimates as mandated by Business and Professions Code section 9884.9. Defendants were specifically requested to keep all original parts they had claimed to have rebuilt or replaced, so their work could be verified, but ignored that instruction, making verification impossible without a complete tear-down of the motorcycle.

10. Defendants' incompetence is further documented in Google reviews from other customers complaining of similar unauthorized work, safety issues, replacing parts with used parts from other motorcycles, and bullying their customers. Attached herewith as **Exhibit I** are true and correct copies of select Google reviews for SoCal SuperBikes.

Public Menace and Danger to Consumer Safety.

11. Defendants operate as a menace to public safety, targeting motorcycle riders whose vehicles require precision maintenance for safe operation at high speeds. Their unlicensed operations violated Business and Professions Code section 9884.6(a) across three distinct time periods with escalating disregard for regulatory authority: initial unlicensed operations (5/13/2020-8/9/2022), willful violations after the first BAR citation (8/9/2022-12/10/2025), and criminal violations after the formal Order of Abatement (12/10/2025-2/18/2026). Despite multiple regulatory citations, defaults in this litigation, and eviction from their premises, Defendants continue to control valuable business assets including their domain socalsuperbikes.net, Instagram account @socalsuperbikes (13,900+ followers), and other online presence that pose ongoing risks of consumer deception.

12. Their abandonment of business operations while maintaining control of marketing assets, combined with their false "Spring Break" advertising and invalid licensing obtained through address fraud, demonstrates a clear pattern of deception that continues to endanger California consumers who may encounter their online presence and mistakenly believe they are dealing with a legitimate, licensed business.

1 **Class Size and Contact Information Discovery**

2 13. Based on early discovery through subpoenaed business records from Defendants' payment
3 processors, banks, and service providers, I have identified over 3,000 California consumers who paid
4 Defendants for motorcycle services during the relevant class period from May 13, 2020, through the
5 present. The putative class members have been identified through business records including intake
6 logs, point-of-sale records, communications, and payment data obtained by Subpoena, which was also
7 served on Defendants. I have obtained mailing addresses and email addresses for the majority of these
8 consumers through the business records discovery, making direct notice feasible and cost-effective.

9 **Evidence Preservation Urgency**

10 14. Given Defendants' eviction from their business premises, abandonment of operations, and
11 ongoing business dissolution, critical evidence including business records, customer files, repair
12 orders, parts receipts, warranty information, and documentation of Defendants' unlicensed operations
13 is at immediate risk of being lost or destroyed. Many putative class members are almost certainly
14 unaware of the pending litigation, the BAR regulatory findings, or their potential legal rights under
15 California consumer protection laws. The proposed notice serves the essential case management
16 function of alerting these consumers to preserve their own records and evidence before it is lost.

17 **Professional Relationship and Disclosure**

18 15. As indicated in the original CLRA Civil Code §1782 30-day notice (**Exhibit F**), the
19 motorcycle in question was a gift from me to my son, Daniel Chaffin, meant to be a summer project
20 to celebrate his graduation from College. My representation of Daniel and potential representation of
21 putative class members in this action poses no conflict with the interests of the proposed class, as all
22 putative class members share the same interest in obtaining restitution and protecting against ongoing
23 consumer harm from Defendants' unlicensed operations. The proposed notice serves to protect all
24 class members' interests equally. It is a matter of coincidence that the motorcycle shop that Plaintiff
25 chose to perform inspection, repairs and potential rebuild of his motorcycle had been operating
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1 illegally and in violation of the orders of the California Bureau of Automotive Repair since its
2 inception.

3 16. There is no conflict of interest raised by my representation of the Plaintiff or the class in this
4 matter, should class certification be granted. The choice of SoCal SuperBikes as a repair shop was
5 wholly the decision of Plaintiff, and my role was limited to that of a father buying his son a graduation
6 gift. I was originally listed in the CLRA Civil Code §1782 30-day notice as a client primarily because
7 I purchased the motorcycle as a gift for the Plaintiff, but my interest in the motorcycle was assigned
8 and given to Plaintiff as a gift. I am not a Plaintiff or potential Plaintiff and therefore have no personal
9 stake in the outcome of Plaintiff's claims or the claims of the class.

10 **Proposed Notice Content and Neutrality**

11 17. The proposed Notice attached as **Exhibit J**, and also attached to the [Proposed] Order filed
12 concurrently herewith, is factual, neutral, and designed to avoid any impropriety while serving
13 legitimate consumer protection purposes. The Notice references publicly available information
14 including the BAR citations, the pending litigation, and general information about California
15 consumer protection laws applicable to unlicensed operations. The Notice includes clear disclaimers
16 that the court has not certified a class, that no action is required by recipients, and that the outcome is
17 uncertain. The Notice does not solicit participation, guarantee outcomes, or characterize the merits of
18 the case, but rather provides educational information about potential rights under California law. Of
19 utmost importance, the Notice references safety related issues and evidence established in this case to
20 date, which is of utmost importance for Consumer protection, given that motorcycles and safe
21 operation are involved.

22 18. The Notice emphasizes safety-related concerns because Defendants' unlicensed motorcycle
23 repairs create serious public safety hazards, as motorcycles require precision maintenance for safe
24 operation at highway speeds, and improper repairs can result in catastrophic accidents, serious injury,
25 or death.

26 **Timing and Case Management Urgency**

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1 19. This Court has set July 28, 2026, as the deadline for class certification motions in this matter,
2 with default prove-up scheduled for the same date, should default judgment be chosen instead of class
3 certification, or should the Court deny class certification and grant default judgment instead. Given
4 the compressed timeline, the business dissolution, and the risk of evidence destruction, immediate
5 court-approved notice is necessary to ensure putative class members can preserve their claims and
6 evidence before the certification hearing. Delaying notice until after certification would likely result
7 in the permanent loss of critical evidence and consumer records, undermining the effectiveness of any
8 eventual class relief.

9 20. The current intention, subject to change, is to file a motion for class certification, or in the
10 alternative, for default judgment on behalf of Plaintiff Daniel Chaffin consistent with the Statement
11 of Damages and prayer for relief filed on his behalf. Whichever ultimately occurs, the requested
12 Notice is appropriate under the circumstances to inform and protect the Consumers and putative class
13 members at issue.

14 I declare under penalty of perjury under the laws of the States of California and Montana that
15 the contents of this declaration are true and correct, and that it was executed on April 17, 2026 at
16 Whitefish, Montana.

17 */s/KDChaffin*

18 _____
Kevin D. Chaffin

EXHIBIT A



BUSINESS, CONSUMER SERVICES, AND HOUSING AGENCY • GAVIN NEWSOM, GOVERNOR

ENFORCEMENT OPERATIONS BRANCH

10949 North Mather Boulevard, Rancho Cordova, CA 95670
P 916.403.8060 F 916.464.2879 | www.bar.ca.gov



Citation # [REDACTED]

SoCal Superbikes, Alexander Jason Quintero - President
10632 Garden Grove Boulevard, Unit B
Garden Grove, CA 92843
DBA: SoCal Superbikes
ARD #: Unregistered

N

Information obtained by the Bureau of Automotive Repair has determined that you are holding yourself out to the public as an automotive repair dealer without possessing a valid Automotive Repair Dealer (ARD) Registration.

A citation is hereby issued to you in accordance with Business and Professions Code §148 and California Code of Regulations §3394.40 et. seq. for the violation described below.

CAUSE FOR CITATION

Operating as an automotive repair dealer while not in possession of a valid automotive repair dealer registration.

9884.6(a) Business and Professions Code: It is unlawful for any person to be an automotive repair dealer unless that person has registered in accordance with this chapter and unless that registration is currently valid.

SoCal Superbikes, Alexander Jason Quintero - President

DBA: SoCal Superbikes

Engaged in acts, as defined in Business and Professions Code §9880.1 and/or California Code of Regulations §3371.1, requiring registration as an Automotive Repair Dealer pursuant to Business and Professions Code §9884.6(a).

Bureau of Automotive Repair

Jack Snyder

Date:

August 9, 2022

Citation #: [REDACTED]
Page 2 of 2

Order of Abatement

You do not hold a valid Automotive Repair Dealer Registration, and are ordered to cease all work which requires a valid registration. Failure to comply may result in the assessment of a monetary fine, up to \$5,000 for each violation, and/or other disciplinary action.

If you wish to apply for an Automotive Repair Dealer registration, remit to the Bureau of Automotive Repair a check or money order in the amount of \$200.00, accompanied by a completed application for registration as an Automotive Repair Dealer. Do not send cash, or partial payment. You may not perform the services of an Automotive Repair Dealer until, and unless, a registration is actually issued. Continuing to operate without a valid registration may result in citation, fine, and/or other disciplinary action in addition to the disconnection of any telephone services associated with unlawful advertising.

You must send your application fee of \$200.00, along with the attached remittance form and application for registration as an Automotive Repair Dealer, to:

Department of Consumer Affairs
Cashiering Unit
P.O. Box 989001
West Sacramento, CA 95798-9001

If you choose to contest this Citation through the informal conference process, your request to do so must be in writing or by way of a completed "Request to Appeal Citation" form, returned to the following address within **ten (10)** days of service of this Citation.

Bureau of Automotive Repair
Enforcement Operations Branch - Suite 2000
10949 North Mather Blvd.
Rancho Cordova, CA 95670

If you choose to contest this Citation through a formal hearing before an Administrative Law Judge in accordance with Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code, your request to do so must be in writing or by way of a completed "Request to Appeal Citation" form, returned to the above address within **thirty (30)** days of service of this citation.

If you fail to request an informal conference or hearing, the citation shall be deemed the final order of the Department. Any questions regarding this citation and abatement requirements thereof should be directed to the Bureau's Enforcement Operations Branch at (916) 403-8060.

[REDACTED]

Jack Shyder
Program Representative I
Bureau of Automotive Repair
Irvine Field Office



August 9, 2022

Date

**ENFORCEMENT OPERATIONS BRANCH**

10949 North Mather Boulevard, Rancho Cordova, CA 95670

(916) 403-8060 | BAREnforcementOperations@dca.ca.gov | www.bar.ca.gov

**Citation Number:** [REDACTED]**December 10, 2025**

Pursuant to Business and Professions Code §148 and California Code of Regulations, Title 16, §3394.40, the Bureau of Automotive Repair (Bureau) issues this citation to:

Socal Superbikes, Jose Luis Gonzalez - President**DBA Socal Superbikes****ARD: Unregistered****10632 Garden Grove Blvd Unit B, Garden Grove, CA 92843**

CITATION AND ORDER OF ABATEMENT

**The Bureau hereby orders you to immediately cease and desist from violating
Business and Professions Code (B&P) §9884.6(a).**

B&P §9884.6(a): It is unlawful for any person to be an automotive repair dealer unless that person has registered in accordance with this chapter and unless that registration is currently valid.

CAUSE FOR CITATION (DESCRIPTION OF NATURE AND FACTS OF THE VIOLATION):

On December 10, 2025, Socal Superbikes, Jose Luis Gonzalez - President DBA Socal Superbikes engaged in acts, as defined in Business and Professions Code §9880.1 and/or California Code of Regulations §3371.1, requiring registration as an Automotive Repair Dealer (ARD) pursuant to Business and Professions Code §9884.6(a), without a valid ARD registration issued by the Bureau.

EXHIBIT B



ENFORCEMENT OPERATIONS BRANCH

10949 North Mather Boulevard, Rancho Cordova, CA 95670
P 916.403.8060 F 916.464.2879 | www.bar.ca.gov



Citation # [REDACTED]

SoCal Superbikes, Alexander Jason Quintero - President
10632 Garden Grove Boulevard, Unit B
Garden Grove, CA 92843
DBA: SoCal Superbikes
ARD #: Unregistered

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SoCal Superbikes, Alexander Jason Quintero - President

DBA: SoCal Superbikes

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Bureau of Automotive Repair

Jack Snyder

Date:

August 9, 2022

Citation #: [REDACTED]
Page 2 of 2

Order of Abatement

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P.O. Box 989001
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[REDACTED]
Jack Shyder
Program Representative I
Bureau of Automotive Repair
Irvine Field Office



August 9, 2022

Date

**ENFORCEMENT OPERATIONS BRANCH**

10949 North Mather Boulevard, Rancho Cordova, CA 95670

(916) 403-8060 | BAREnforcementOperations@dca.ca.gov | www.bar.ca.gov

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EXHIBIT C

[Open Government](#)[Residents](#)[Businesses](#)[Public Safety](#)[News](#)[Media Kit](#)

Business License Lookup

[Finance](#) / Business License Lookup

Search by Business Name, Address, or Owner:

Note: if you're a home-based business, please call (714) 741-5074 instead to locate your license.

[Finance Department](#)

[Patricia Song](#)

[Budget and Financial Reports](#)

[Business License Lookup](#)

[Business License](#)

[Business License - Application](#)

[Business License - Instructions](#)

1 Results

Click on Lic# to see and print detailed report.

Lic#	Name(s)	Address(es)	Activity
320934	SOCAL SUPERBIKES	10632 GARDEN GROVE BLVD #B	BIKE SALES & SERVICE

[Business License - FAQs](#)

[Purchasing](#)

[Planet Bids Portal](#)

[Water Billing](#)

[Pay Water Bill](#)

[Credit/Debit Card Payment
Processing Fee FAQ](#)

[Use Water Wisely](#)

[Water Rates](#)

[Water Service Start and Stop](#)

[SB 998 Information](#)

[CARE Senior Discount](#)

[Water Bill Autopay Form](#)

[Water Services Division](#)

[Water Use FAQ's](#)

City Hall

Monday thru Thursday

7:30am - 5:30pm

Alternating Fridays

7:30am - 5:00pm

Closed - Friday 9/26

Calendar

[Friday & Holiday Closure
Schedule](#)

Legal

[Privacy Policy](#)

Contact

Garden Grove City Hall

[11222 Acacia Parkway
Garden Grove, CA 92840](#)

Phone

[\(714\) 741 - 5000](#)

Services Directory

[Services Directory](#)

Connect

Social Media



Social Media Directory

[Social Media Directory](#)

Email

info@ggcity.org

Select Language 

Powered by  Google Translate

EXHIBIT D

12:11



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DS

David Soleymani >

Hi David. What is the status of the tenant and the scanned bank records?

Wed, Apr 1 at 1:35 PM

Kevin, they moved out and space is empty now. I am having someone go do a walk through and get the keys from them.

I will get you the bank statements.

Thanks.

I will send you images of the empty space once I get the images.

Wed, Apr 1 at 3:26 PM



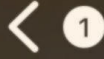
Text Message • SMS



12:12



79%



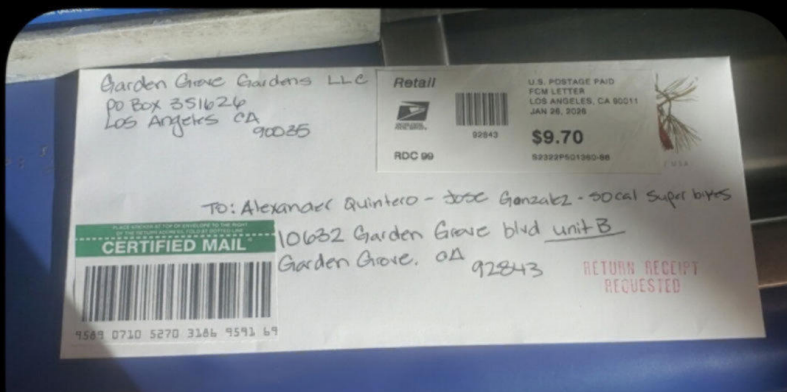
1

DS

David Soleymani >

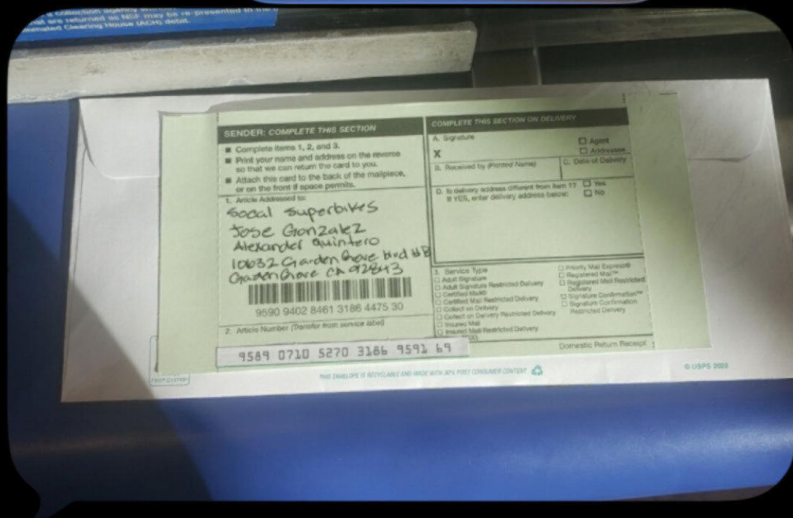
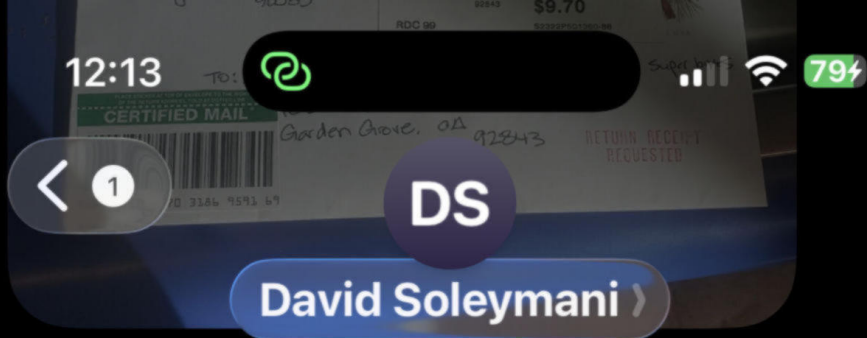


Mon, Jan 26 at 4:26 PM

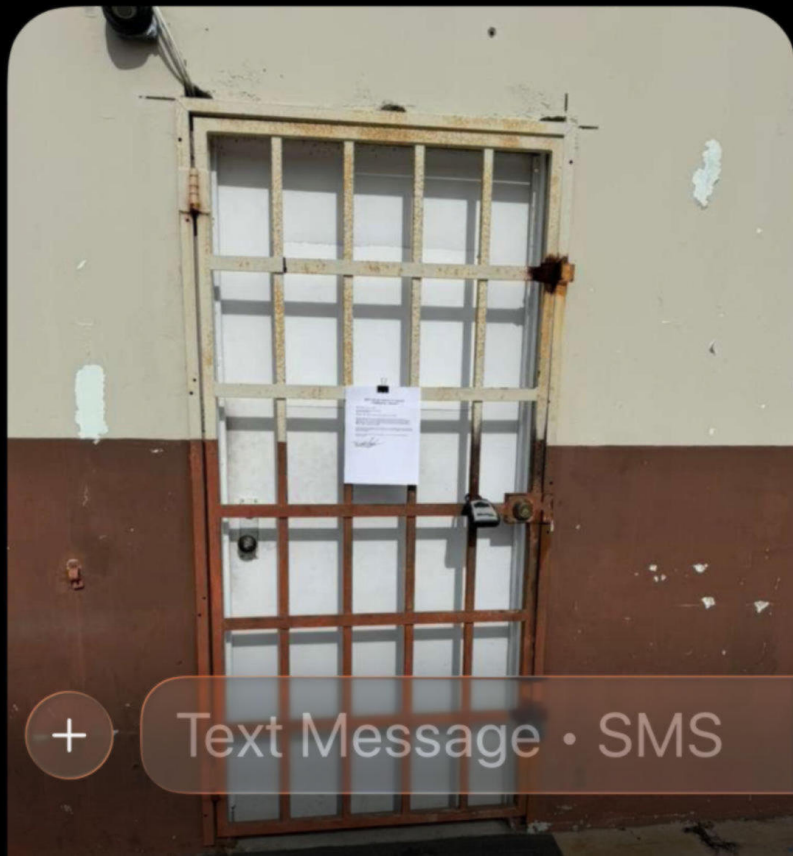


Text Message • SMS





Great. Thanks David. By chance do you have a zoomed out picture of the posting



Text message
4/1/2026 1:35:02 PM (Read 4/1/2026 1:35:25 PM)

David Soleymani (+13108673154)

Kevin, they moved out and space is empty now. I am having someone go do a walk through and get the keys from them.

I will get you the bank statements.

4/1/2026 1:35:40 PM

Thanks.

4/1/2026 1:35:45 PM (Read 4/1/2026 1:35:45 PM)

David Soleymani (+13108673154)

I will send you images of the empty space once I get the images.

4/1/2026 3:26:45 PM (Read 4/1/2026 3:26:53 PM)

David Soleymani (+13108673154)



4/1/2026 3:26:55 PM (Read 4/1/2026 3:26:55 PM)

David Soleymani (+13108673154)



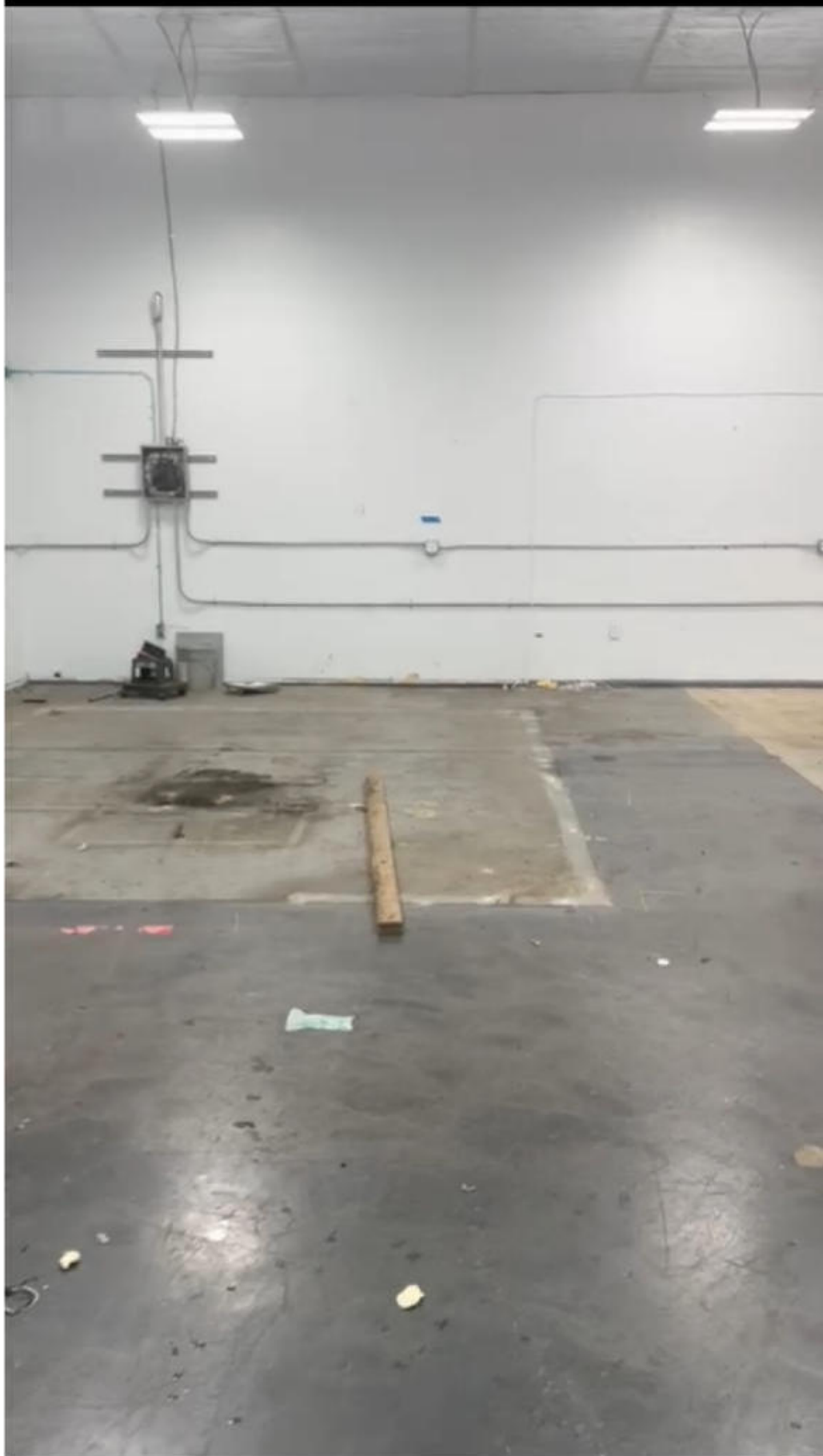




EXHIBIT E

[CONTACT US →](#)

**WE WILL BE CLOSED 3/27 - 4/13
FOR SPRING BREAK**



WELCOME TO SOCAL SUPERBIKES

GIVE US A CALL (714) 643-9136

**Motorcycle Repairs And Custom Mods In Orange
County**

**Serving Los Angeles, Orange County, Inland
Empire And Beyond**

EXHIBIT F



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September 25, 2025

Privileged Settlement Communication – Cal. Evid. Code §1152 et seq. – FRE 408

GARDEN GROVE GARDENS, LLC
Attn: Agent David Soleymani
3435 Wilshire Blvd., Suite 2820
Los Angeles, CA 90010

Sent Via US Certified Mail,
Return Receipt Requested
to:
(1) GARDEN GROVE GARDENS, LLC
(2) SOCAL SUPERBIKES
(3) Alexander Jason Quintero
(4) Jazmin Quintero
(5) Jose Gonzalez
(6) Erik Mora

SOCAL SUPERBIKES (CA Corp. – Status Suspended)
Attn: Agent Jose Gonzalez, Alexander Jason
Quintero, Jazmin Quintero, Jose Gonzalez, Erik
Mora (all Owners, Officers or Managing Agents)

ALEXANDER JASON QUINTERO, an individual
JAZMIN QUINTERO, an individual
JOSE GONZALEZ, an individual
ERIK MORA, an individual
10632 W. Garden Grove Blvd., Unit B
Garden Grove, CA 92843

**Re: Notice of Intent to Commence Civil Action for Violation of the California
Consumer Legal Remedies Act (CLRA) – Cal. Civil Code § 1770 et seq.**

30-Day Notice of Commencement of Class Action – Cal. Civil Code §1782

To Whom It Should Concern, including:

GARDEN GROVE GARDENS, LLC, and its individual owner(s)/member(s)(not public record)
Attn: David Soleymani, Agent for Service of Process
SOCAL SUPERBIKES, a California Corporation (Status Suspended)
Attn: Agent Jose Gonzalez, Alexander Jason Quintero and Jazmin Quintero
Alexander Jason Quintero, an individual
Jazmin Quintero, an individual
Jose Gonzalez, an individual
Erik Mora, an individual

Dear GARDEN GROVE GARDENS, LLC (and its individual owner(s)/member(s)), SOCAL SUPERBIKES, Mr. Alexander Jason Quintero, Ms. Jazmin Quintero, Mr. Jose Gonzalez, Mr. Erik Mora, and DOES 1-100 (collectively, “You,” “Your,” or “Defendants”)

This law firm represents Daniel Chaffin and Kevin Chaffin, owners of a 2000 Suzuki Hayabusa GSX1300R motorcycle (VIN JS1GW71A6Y2106167), currently in your possession.

This letter serves as formal notice under California Civil Code Section 1782 of the Consumers Legal Remedies Act (CLRA), Civil Code Sections 1750 *et seq.*, regarding violations of the CLRA in connection with the delivery of our clients' 2000 Suzuki Hayabusa GSX1300R motorcycle (VIN JS1GW71A6Y2106167) for repair and modification services on June 7, 2025. You are hereby provided with this notice of demand that you correct, repair, replace, or otherwise rectify the violations described below **within 30 days of receipt of this letter, as required by Section 1782(a)**. Additionally, this letter addresses the requirements of Section 1782(c) for potential class action claims, as your practices have affected other similarly situated consumers.

Description of the Transaction

On or about June 7, 2025, you were delivered a 2000 Suzuki Hayabusa GSX1300R motorcycle (VIN JS1GW71A6Y2106167) ("The Hayabusa") at your advertised place of business, 10632 W. Garden Grove Blvd, Unit B¹, Garden Grove, California, for diagnosis, repair, and modification services. You represented that your business, operating as SOCAL SUPERBIKES, was a legitimate, licensed, and professional operation staffed by experts in repairs and modifications of the Suzuki Hayabusa model, including expertise in diagnosing, repairing, and modifying Suzuki Hayabusas with all stages of turbo kits, as you similarly represented to other customers regarding various motorcycles and motor vehicles.

You further claimed to provide honest, thorough inspections, workmanlike professional quality repairs, and timely delivery, with specific representations about the availability and pricing of parts. The delivery of the Hayabusa to you was based on your false advertising, and false promises, and your representation that you would conduct a thorough, ground-up inspection, with the intent of replacing or repairing every damaged, worn or agreed-upon (after the inspection) part of the motorcycle, up to and including a full engine rebuild and optional Stage 1, 2, or 3 turbo kit, for the repair and modification services to be determined, for labor at shop rates and parts at a fair market rate of mark-up over your discounted costs, consistent with similar businesses in the California business community. The Hayabusa was delivered to you based on your representations regarding the scope, quality, and expertise of your work.

The decision to trust your business with this work was made after extensive investment of time and expense by our clients. Specifically, Kevin Chaffin², father of Daniel Chaffin, bought this Hayabusa as a graduation present for his son, Daniel Chaffin, who was born the same year as the first year the Suzuki Hayabusa was sold, and this specific year and model, a pre-ban Busa, was a gift to recognize his son's hard work, dedication, drive, discipline, character, and to honor his son before he chooses between law school or Officer's Candidate School for the United States Military. As communicated specifically to you, a detailed, thorough inspection of this motorcycle was requested by our clients, and promised by you, repeatedly, with the understanding that no expense would be spared to ensure that his son's dream bike would be 100% safe, and possibly rebuilt or rebuilt and modified with a Stage 1, 2, or 3 turbo kit.

Specifically, you were told that our clients wanted an exhaustive, thorough, ground-up inspection of the motorcycle, a complete diagnosis of everything needed to make this motorcycle safe, as a starting point, with the possibility of a rebuild and a modification to include a turbo kit, depending on what was revealed during the inspection and diagnosis. You were told that our clients would spare no expense to make this motorcycle safe, and you were asked to leave no screw unturned, and no single part of this

¹ 10632 W. Garden Grove Blvd. Unit B, commercial sub-designation, aka 10642 W. Garden Grove Blvd.

² Kevin Chaffin is the Senior Trial Attorney for this law firm. <https://www.tomorrowlaw.com/attorney-profiles/kevin-chaffin/> He is a client in this matter, as is his son, Daniel Chaffin.

motorcycle untouched. Kevin Chaffin assured you that he would do whatever necessary to ensure that his son, Daniel Chaffin, would not be placed at risk of harm due to any mechanical issue. You understood our clients' intentions and expectations, and you promised to deliver. You failed. Worse, you intentionally misled our clients, as you have misled numerous other customers and members of the public.

After delays, repeated promises to perform, repeated failures, your evolving and escalating description of problems, excuses, missed calls, unreturned calls, text messages, voicemails, over 3 months after delivery, and repeated false statement by you that you had thoroughly inspected and diagnosed this motorcycle, on Wednesday, September 17, 2025, you suddenly claimed that the Hayabusa's forks were bent and needed to be replaced. By Friday, September 19, 2025, you unilaterally indicated that forks for a 2000 Suzuki Hayabusa were no longer available, stated "*All of your repairs are done...*" and "*your bike is ready for pick up.*" No explanation. No calls or texts or documentation identifying mechanical issues with the Hayabusa. No signed work orders. No step-by-step diagnosis, evaluation of options, no consent.

Based on your despicable and fraudulent conduct, our clients, like any reasonable customer, would never ride a motorcycle that had been "repaired" by you after your display of total lack of credibility, professionalism or integrity. This letter and your response are required **before a Class Action on behalf of all of your customers, past and present**, is commenced. The condition and safety of a high-performance motorcycle is of obvious concern to any customer. Your past, ongoing, and likely future conduct makes clear that your customers are not safe on any motorcycle you have touched. Anyone who would act with such despicable disregard for their own legal and regulatory obligations cannot be trusted with the safety of customers or the public.

Joint & Several Liability – Garden Grove Gardens LLC and SOCAL SUPERBIKES

Lessor's Knowledge of and Benefit from SoCal Superbike's Ongoing Illegal Business Practices

GARDEN GROVE GARDENS, LLC is one of many entities owned by the same individual(s), operating shady commercial real estate investments through shell companies, employing deceptive and intentional efforts to conceal the true identity(ies) of their owner(s), purposefully allowing and encouraging tenants like SOCAL SUPERBIKES to engage in the practices set forth specifically herein, for their mutual benefit, and the benefit of other tenants and lessees of commercial properties owned by and leased by the same individual(s), through shells like GARDEN GROVE GARDENS, LLC.

Specifically, the individual(s) maximize their commercial lease income, and evade local, state, and federal regulations, thus reducing their costs and increasing their profitability, by allowing tenants like SoCal SuperBikes to attract targeted market segments, including customers according to their discretionary spending profiles, increasing foot traffic for other lessees and tenants in the same and adjacent property(ies), thus increasing lease income for the owner, and business income for the tenants.

A preliminary analysis of Garden Grove Gardens, LLC's operations at the SoCal SuperBikes location indicates that a further, much more thorough, investigation of the other entities, the other tenants, at the other commercial properties located throughout California, and a full audit of their business practices will reveal a much larger pattern of unfair business practices and illegal conduct, all of which are specifically designed by the owner(s) of GARDEN GROVE GARDENS, LLC to increase profits, minimize risk and liability, at the costs of consumers and the public at large.

The business practices of the owner(s) of GARDEN GROVE GARDENS, LLC, are replicated by its individual owner(s), at numerous other commercial real estate properties, through numerous other shell companies, primarily operating in California. At this time, this notice is limited to GARDEN GROVE GARDENS, LLC and SOCAL SUPERBIKES, and the individuals named herein. Other tenants, such XTREME EDGE PROFESSIONAL AUTO DETAILING INC., and its operators, Allen Nguyen and Leo K Le, are at least aware of Defendants' conduct, as evidenced by Allen's refusal to identify the owner of the building when asked, and tacit acknowledgment of Defendants' practices when told the purpose of asking for the

building owner's contact information was to inquire about the business activities in Unit B of the same building.

CLRA Violations

Your actions in connection with this transaction violate the provisions of California Civil Code Section 1770(a), which prohibits unfair methods of competition and unfair or deceptive acts or practices in the sale or lease of goods or services to consumers. Specifically, the violations include:

1. Section 1770(a)(2): Misrepresenting the source, sponsorship, approval, or certification of goods or services.
 - You falsely represented your business as legitimate, licensed, professional motorcycle experts, yet you identified yourself as Sporting Goods and Bicycle Shop, Bike Sales and Service on [e.g., filings with the City of Garden Grove, California Secretary of State and Franchise Tax Board], when you were engaging in motorcycle repair and modification, **activities requiring registration and licensing as an Automotive Repair Dealer (ARD) with the California Bureau of Automotive Repair (BAR).**³ You offer motorcycles for sale yet **without a Motor Vehicle Dealer License (Motorcycle Class) from the California Department of Motor Vehicles.** You operate **without a Motor Vehicle Dealer Surety Bond.** You have no such registration or licensing or bonding. This misrepresentation misled and continues to mislead customers about the government's approval of, the legitimacy and certification of your services, and is an intentional effort on your part to evade the regulatory requirements placed on your business to protect customers and the public.
 - You installed replacement parts there were not new, not of high quality, and even took parts off other customers' motorcycles and installed them as if they were new.
2. Section 1770(a)(5): Representing that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits, or quantities that they do not have or that a person has a sponsorship, approval, status, affiliation, or connection that the person does not have.
 - You represented that your business was properly licensed and staffed by certified, trained mechanics with expertise in repairing and modifying Suzuki Hayabusas, and other motorcycles. In reality, you lacked a BAR license, failed to register as an ARD, and did not employ properly licensed, certified, or trained mechanics for these specific repairs and modifications, misrepresenting your qualifications and capabilities.
3. Section 1770(a)(7): Representing that goods or services are of a particular standard, quality, or grade, or that goods are of a particular style or model, if they are of another.
 - You represented that the repair and modification services would be of professional quality, performed by experts in Suzuki Hayabusa modifications. Instead, the services were shoddy, resulting in your unilateral decision to return the motorcycle in an unsafe condition, including bent forks, and the ludicrous claims that forks for a Suzuki Hayabusa were not available, indicating a lower standard of quality than promised. You claimed to have thoroughly inspected the Hayabusa, multiple times, yet as of the last communication, you suddenly claimed the forks were bent and needed replacement, refused to provide text or voicemail explanation, then unilaterally claimed the repairs were done (despite no specific thorough inspection, no confirmation from the customer

³ Garden Grove Gardens, LLC and its' members' patterns and practice of allowing tenants to operate without proper licensing, filing of false business descriptions for tax evasion and regulatory evasion purposes, including City, County, State and Federal environmental, hazardous waste regulations, is immediately evident from just this first investigation of one tenant, in one property.

as to which repairs would be authorized) and claimed that replacement forks for a 2000 Suzuki Hayabusa were no longer available.

4. Section 1770(a)(9): Advertising goods or services with intent not to sell them as advertised.
 - You advertised that you provided expert, timely repair and modification services for Suzuki Hayabusas and other motorcycles, but failed to deliver as promised, ignored inquiries about the status of the services, and performed substandard work, indicating an intent not to provide services as advertised.
5. Section 1770(a)(13): Making false or misleading statements concerning reasons for, existence of, or amounts of, price reductions.
 - You made false statements about the pricing and availability of parts, including oil pumps, turbo kit components, tires, and forks at a discounted rate, when such parts were either available when not, or unavailable when available, or of inferior quality, misleading the customer about the true cost and nature of the parts and modifications.
6. Section 1770(a)(14): Representing that a transaction confers or involves rights, remedies, or obligations that it does not have or involve, or that are prohibited by law.
 - You represented that your services were performed by a licensed and qualified business, implying compliance with California Business and Professions Code Section 9884. Your failure to obtain a BAR license and register as an ARD rendered these representations false, depriving our clients of the protections and quality assurances associated with a licensed repair facility.
7. Section 1770(a)(15): Representing that a part, replacement, or repair service is needed when it is not, or not needed when it is:
 - You misled the customer about the necessity of certain repairs or modifications, falsely claiming that, when such services were unnecessary or not performed, resulting in additional costs and unsafe conditions.
8. Section 1770(a)(16): Representing that the subject of a transaction has been supplied in accordance with a previous representation when it has not.
 - You promised timely delivery of a properly repaired and modified motorcycle but failed to complete the services as represented, ignored repeated inquiries (via text messages, phone calls, and voicemails), and returned the motorcycle in an unsafe condition, contrary to your promises.
9. Section 1770(a)(18): Misrepresenting the authority of a salesperson, representative, or agent to negotiate the final terms of a transaction with a consumer.
 - Your employees represented themselves as qualified experts in Suzuki Hayabusa repairs and modifications, including turbo kit installations, and as authorized to negotiate service agreements. However, the business lacked a BAR license and failed to train employees in compliance with California Occupational Safety and Health Administration (Cal-OSHA) regulations, misleading customers about their authority and competency.
10. Section 1770(a)(21): Selling “grey market goods” in violation of Civil Code § 1797.8.
 - You sold and provided parts normally accompanied by an express written warranty valid in the USA, imported from sources other than the manufacturer’s authorized US distributors, not accompanied by the manufacturer’s express written warranty.

11. Sections 1770(a)(2,5,8,9,13,17): **Astrourfing** and **Number Laundering** and **Deceptive Ads**

- You are engaged in creating fake social media accounts for purposes of providing false and misleading positive review, and for discrediting other legitimate consumer reviews, and provided false responses to online reviews, and falsely submitted legitimate negative customer review reports to the online sites hosting those reviews in an effort to have those reviews deleted or modified for the purposes of: (i) falsely implying consumer approval (ii) false representations of benefits or endorsements that do not exist (iii) addressing disparaging competitors or legitimate reviews through false facts (iv) misleading claims about popularity or value inflated by fake likes and (v) misled consumers by failing to disclose the false nature of reviews or responses, on numerous social media platforms including Instagram, Google, Facebook, Yelp and others.
- You are engaged in the deceptive practice of number laundering, using phone numbers such as (714) 208-7013 to attempt to hide your identity, confuse customers, suppress phone records, eliminate access to text messages, by repeatedly porting your phone numbers in and out of various carries and VOIP services, with the specific intent to further your fraudulent and despicable business practices.
- You use the number “851057879” to advertise your business⁴, and on your business forms, in a deceptive way, to indicate that you are properly licensed, when in fact, you have no BAR license, no CDTFA number, and no legitimate licensing or registration number of any kind listed on your form.

Additional Violations and Illegal Conduct

In addition to the CLRA violations, Defendants engaged in the following deceptive and unlawful practices, which contributed to the harm suffered by our clients. While some of these issues may fall outside the scope of the CLRA, they are included to provide context and support potential additional claims:

1. **Misrepresentation to Regulatory Authorities:** You submitted false information to the City of Garden Grove, falsely describing your business as a Sporting Goods and Bicycle Shop to evade proper tax status classification, licensing requirements, and inspections under Garden Grove Municipal Code (GGMC) § 5.01.080 (failure to report material changes) and GGMC § 9.52.020 (engaging in prohibited activities). This intentional misrepresentation allowed you to operate without proper oversight, misleading consumers about the legitimacy of your business.
2. **Failure to Obtain Required Licenses and Permits:**
 - **You failed to register with the California Bureau of Automotive Repair as an Automotive Repair Dealer (ARD)**, as required by California Business and Professions Code § 9884.6, and failed to obtain a BAR license to repair or diagnose motorcycles and motor vehicles.
 - **You failed to obtain and maintain a Seller’s Permit** from the California Department of Tax and Fee Administration (CDTFA), violating California Revenue and Taxation Code § 6066.
 - **You failed to file an accurate Hazardous Materials Business Plan** with the Orange County Health Care Agency (CUPA) and Garden Grove Fire Department, as required by California Health and Safety Code § 25504, exposing customers and the public to hazardous waste.



- **You failed to properly handle and dispose of hazardous waste** in compliance with City of Garden Grove, County of Orange, State of California, and Environmental Protection Agency regulations, violating California Health and Safety Code § 25189.5.
3. Employee Training and Tax Violations:
- You failed to properly train employees as required by Cal-OSHA regulations, and failed to comply with health, safety and environmental hazardous waste regulations, violating California Labor Code § 6400 *et seq.*, exposing your employees and customers to hazardous materials and conditions, which compromised the safety and quality of repair and modification services provided to consumers.
 - You submitted false information and falsified tax returns to the California Franchise Tax Board and the United States Department of Treasury, violating California Revenue and Taxation Code § 19701 and 26 U.S.C. § 7206, respectively.
 - You submitted false information to the California Secretary of State, violating California Corporations Code § 1502, further concealing the true nature of your operations.
4. Failure to Report Income and Pay Taxes: You failed to accurately report all income earned and pay all taxes due to the City of Garden Grove Finance Department, violating GGMC § 5.04.010 *et seq.*, as well as the State of California, which contributed to your ability to operate deceptively without proper oversight.

These actions constitute a concerted effort of fraud, false promises, unfair business practices, and false advertising, misleading consumers about the legitimacy, expertise, and quality of your services.

Harm Suffered

As a result of the above violations, our clients have suffered harm, including but not limited to:

- Financial losses for motorcycle hauling, trailer rental, transportation, communications, the cost of purchases, registration, improvements, and parts for the motorcycle, in excess of \$12,000.00.
- Additional costs of attorney's fees, investigation, postage, in excess of \$28,000 to date.
- Loss of use of motorcycle, wasted time on phone calls, texts, research, delay, interruption of planned trips, interruption of scheduled trips, including the one week vacation our clients took together, for the first time, riding motorcycles from Chicago to Ohio through the Michigan Upper Peninsula, for the purpose of our client, Daniel Chaffin, swimming in the Edmund Fitzgerald 50th Anniversary Memorial Swim, as a Stage 1 swimmer, the trip of a lifetime, interrupted by yet another phone call from you, while sitting in the airport, making more excuses for your fraud and delay, in excess of \$70,000 to date.
- Exposure to unsafe conditions at your property due to improper handling of hazardous materials. Cost of potential future medical bills and damages, in an amount to be determined.

Class Action Notice and Requirements Under California Civil Code § 1782(c)

Your deceptive practices, as described above, have not only affected our clients, but also other similarly situated consumers who engaged your services for motorcycle repairs and modifications, as evidenced by your widespread false advertising on platforms such as Facebook, Instagram, and Google, and your pattern of ignoring customer inquiries. Pursuant to California Civil Code § 1782(c), which governs the prerequisites for a class action for damages under the CLRA, **you are hereby notified** of the following steps you must take to avoid such an action:

1. **Identification of Similarly Situated Consumers:** All consumers similarly situated—those who engaged your services for motorcycle repairs or modifications have been identified, or a reasonable effort to identify such consumers has been made. You have all their phone numbers,

contact information, VIN numbers, license plate numbers. You are obligated by law to identify your customers in order to comply with this section. (See Cal. Civil Code §§ 1770, 1781, 1782(c).)

2. **Notification of Consumers:** All consumers so identified must be notified that, upon their request, you will make the appropriate correction, repair, replacement, or other remedy of the goods and services provided. You are required to proactively contact these consumers and offer to rectify the harm caused by your deceptive practices. (See Cal. Civil Code §§ 1770, 1781, 1782(c).)
3. **Provision of Remedies:** The correction, repair, replacement, or other remedy requested by these consumers must be provided, or, within a reasonable time, shall be provided. This includes, but is not limited to, refunding payments for defective services, repairing or replacing improperly modified motorcycles, and compensating for additional costs incurred. (See Cal. Civil Code §§ 1770, 1781, 1782(c).)
4. **Cessation of Unlawful Practices:** You must immediately cease engaging in the methods, acts, or practices that violate the CLRA, as outlined above. This includes operating without all of the required and appropriate licenses, certificates, and evidence of compliance required for your business. If immediate cessation is impossible or unreasonably expensive under the circumstances, you must, within a reasonable time, cease these practices, including misrepresenting your licensing status, expertise, and service quality, and ensure compliance with all applicable regulatory requirements. (See Cal. Civil Code §§ 1770, 1781, 1782(c).)

Failure to comply with these requirements will result in the pursuit of a class action lawsuit for damages on behalf of our clients and other similarly situated consumers, in addition to our clients' individual claims.

Civil Code §1782(c) – Remedy Requested

In order to avoid confusion, or any later arguments by your attorneys, should you choose to ignore the law, there are remedies that apply to both the Hayabusa specifically in question as to our clients, and also applicable to all of your other hundreds or thousands of customers and consumers who will be class members in 31 days. The remedies requested from Garden Grove Gardens, LLC, SoCal SuperBikes, Alexander Jason Quintero, Jazmin Quintero, Jose Gonzalez, Erik Mora, and DOES 1-100 are as follows:

- I. **Proof of a BAR license.** You must show proof of a valid license from the Bureau of Automotive Repair.
- II. **Proof of a DMV Motor Vehicle Dealer License** from the California Department of Motor Vehicles
- III. **Proof of a Seller's Permit** from the California Department of Tax and Fee Administration (CDTFA).
- IV. **Proof of a valid Business Tax Certificate (aka Business License)** from the City of Garden Grove compliant with the Garden Grove Municipal Code, correctly identifying the true nature of your business. This may require you to submit a Business Tax Application for Commercial Business and a Garden Grove Business Location Review, available on the City of Garden Grove website. However, we are not your attorneys, you should seek your own attorneys, or contact the City of Garden Grove directly, for compliance details.
- V. **Proof of a Hazardous Materials Business Plan** submitted to the Orange County Health Care Agency (CUPA) and Garden Grove Fire Department.

VI. Proof of Identification and Notification of Your Past and Present Customers as to any prior or ongoing repairs that involved the diagnosis, repair, modification, and sales violations that are described here, and your correction, or status of correction, of those issues.

VII. Cessation of Unfair Business Practices and False Advertising as described herein.

VIII. Specific Identification and Documentation of all grey market goods you used on customers' bikes at any time in the past, and specific identification of (a) the grey market goods, (b) the motorcycle or vehicle and the corresponding customers, and (c) identification and notification of the customer.

IX. As to the Hayabusa owned by my clients, Specific Identification and Documentation of everything you have done to the Hayabusa to date, including the specific inspections, each date of inspection, the results of each inspection, the specific parts and materials you used to date, the receipts and documentation for the parts and materials used to date.

In addition, after obtaining all of the proper licenses and permits needed to do the work still needed that you promised, a thorough and specific ground-up inspection, identification, diagnosis, and repair of everything needed to put the Hayabusa in the condition promised, with appropriate updates along the way as promised, and options for rebuild and turbo kit modifications, with proof (with an independent third party observer, or done while video and audio livestreamed or recorded (uninterrupted), or other method that can prove the quality of the diagnosis and work.

X. As to our Clients, reimbursement for damages incurred to date, including loss of use, as described herein, will be provided upon request, and evidence of your intent to comply with the law and this notification.

Final Demand

This letter constitutes a final demand for you to rectify the violations outlined above within 30 days of receipt, as required by California Civil Code § 1782(a). Failure to provide the requested remedies will result in legal action, including but not limited to:

1. A civil action seeking actual damages, punitive damages, and reasonable attorneys' fees and costs under California Civil Code § 1780 for the CLRA violations described above.
2. A request for a Superior Court injunction to immediately cease all business operations at 10642 W. Garden Grove Blvd., Garden Grove, CA 92843 (aka 10632 W. Garden Grove Blvd., Unit B, Garden Grove, CA 92843) and any other locations where Defendants conduct business, and to enjoin Defendants from continuing the illegal and non-compliant actions, including:
 - Operating without a valid California Bureau of Automotive Repair (BAR) license and registration as an Automotive Repair Dealer (ARD);
 - Misrepresenting the nature of your business to evade licensing, tax, and regulatory requirements;
 - Performing shoddy and unsafe repairs and modifications on motorcycles;
 - Engaging in false advertising and deceptive practices on social media and other platforms;
 - Failing to comply with Cal-OSHA, hazardous waste, and tax reporting regulations.

Please direct future communications to me by email or voicemail. If by email, include our CLRA paralegal, Carlo Aguilar caguilar@tomorrowlaw.com and our case's class action email address ChaffinvGardenGroveGardensLLCZ12310295@tomorrowlaw.filevineapp.com.

Notice of Intent to Commence Civil Action for Violation of the California
Consumer Legal Remedies Act (CLRA) – Cal. Civil Code § 1770 *et seq.*
September 25, 2025
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Each and any of the parties involved, including GARDEN GROVE GARDENS, LLC (and its individual owner(s)/member(s)), SOCAL SUPERBIKES, Mr. Alexander Jason Quintero, Ms. Jazmin Quintero, Mr. Jose Gonzalez, or Mr. Erik Mora may contact me by phone as well.

Very truly yours,

/s/ David Bibiyan
David Bibiyan, Esq.
On behalf of our clients,
Daniel Chaffin and Kevin Chaffin
and Future Class Members

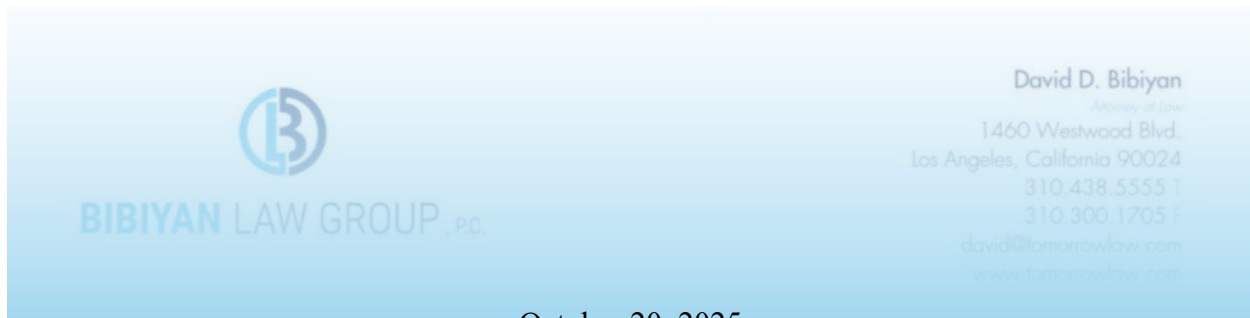
Proof of Delivery

This letter is being sent via certified mail, return receipt requested, to each addressee and address indicated below, with certified mail tracking numbers, to ensure confirmation of receipt. You are strongly encouraged to respond promptly to avoid further legal action. Thank you for your immediate attention to this matter. We look forward to your response within 30 days.

Sincerely,

/s/ Carlo Aguilar
Carlo Aguilar, Paralegal

Addressee	Address	Tracking
GARDEN GROVE GARDENS, LLC Attn: Agent David Soleymani	3435 Wilshire Blvd., Suite 2820 Los Angeles, CA 90010	(1) 9589-0710-5270-2569-0134-81
SOCAL SUPERBIKES (CA Corp.) Attn: Agent Jose Gonzalez	10632 W. Garden Grove Blvd., Unit B Garden Grove, CA 92843	(2) 9589-0710-5270-2569-0134-98
SOCAL SUPERBIKES (CA Corp.) Attn: Alexander Jason Quintero Attn: Jazmin Quintero	10632 W. Garden Grove Blvd., Unit B Garden Grove, CA 92843	(3) 9589-0710-5270-2569-0135-04
Erik Mora	10632 W. Garden Grove Blvd., Unit B Garden Grove, CA 92843	(4) 9589-0710-5270-2569-0135-11
Alexander Jason Quintero Jazmin Quintero	2012 Molino Irvine, CA 92618 2229 Dallas Dr Carrollton, TX 75006-2645 405 S Central Expy Ste 100 Richardson, TX 75080-6130	(5) 9589-0710-5270-2569-0135-28 (6) 9589-0710-5270-2569-0135-35 (7) 9589-0710-5270-2569-0135-42



October 20, 2025

Via Email
Parag Amin
Law Offices of Parag L. Amin
5901 W. Century Blvd. Ste. 1518
Los Angeles, CA 90045
parag@lawpla.com

Re: Email Dated October 16, 2025
2000 Suzuki Hayabusa (VIN JS1GW71A6Y2106167)
9/25/2025 Civil Code 1782 Notice to Defendants – CLRA

Dear Parag:

I understand that you were recently retained. However, you may not be aware of a few undisputed facts which may be helpful. If your clients claim that any of the following facts are untrue, please let me know.

- **Your clients do not have a Bureau of Automotive Repairs license** (Business and Professions Code, Chapter 20.3, Section 9880, et seq) which requires Automotive Repair Dealer (ARD) registration. If this is incorrect, please let me know. This can be verified instantly:

<https://search.dca.ca.gov/advanced?BD=21>

If your clients have a BAR ARD license, please have them provide the license number.

- **Your client's corporation SOCIAL SUPERBIKES has been suspended and remains suspended**

<https://bizfileonline.sos.ca.gov/search/business>

Entity Information ▾	Initial Filing Date ▾	Status ▾	Entity Type ▾	Formed In ▾	Agent ▾
SOCIAL SUPERBIKES (4593726) >	05/13/2020	Suspended - FTB	Stock Corporation - CA - General	CALIFORNIA	JOSE GONZALEZ

Your clients do not have a DMV sellers license for motorcycle sales, or a sales tax permit; yet your clients advertise and sell motorcycles, and motorcycle gear. This can be verified instantly:

<https://www.dmv.ca.gov/portal/vehicle-industry-services/occupational-licensing/occupational-license-lookup/>

If your clients have a DMV motorcycle sales license, please have them provide the number.

- Your clients are selling motorcycle gear without a CDTFA sales (sales tax) permit

<https://socalsuperbikes.net/helmets/>

<https://cdtfa.ca.gov/services/permits-licenses.htm>

This can be verified instantly.

If your clients have a seller's permit, please have them provide the permit number.

- Your clients advertise special knowledge, skill and certified mechanics - there were no certified mechanics at SoCal SuperBikes as of 6/7/2025, nor did a certified mechanic perform the repairs they claim to have performed.

Please have your clients provide the names of all certified technicians and mechanics working at SoCal SuperBikes during the period of 6/17/25-9/17/25

Please have your clients provide the name of the specific certified technician mechanic who performed the repairs on my clients' motorcycle, including their certification credentials.

- Your clients sent a self-serving, untrue and threatening text message to my clients, transparently indicating "authorized repairs" when repairs were not authorized, claiming they rebuilt the "bent" forks (why would anyone rebuild bent forks?), later claiming new forks were unavailable for a 2000 Suzuki Hayabusa (which, anyone familiar with the motorcycle world knows, is ridiculous), and then threatened \$100/day storage fees with no written contract, agreement or authorization of any kind.

- Your clients have no right to possession of this motorcycles - the law is unambiguous - they have no right to assert a mechanic's lien, as they have no license or even a written agreement.

Cal Bus & Prof Code § 9880; § 9884.16. Registration as prerequisite to lien or suit

9/27/2025 10:19:54 AM

FYI your bike has been ready for pick up since 9/19/25 please be advise that we do give one week curtesy after that we charge 100dl per day storage starting next week on Tuesday we will begin the charges, please reach out we can recommend tow companies thank you for your business and patience
STOP to opt out

- (a) A person required to have a valid registration under the provisions of this **chapter shall not have the benefit of any lien for labor or materials, including the ability to charge storage fees** in accordance with applicable laws, or the right to sue on a contract for motor vehicle repairs unless the person possesses a valid registration.
- (b) The bureau may adopt regulations, as necessary, in accordance with Chapter 6.5 (commencing with Section 3067) of Title 14 of Part 4 of Division 3 of the Civil Code and Section 22524.5 of the Vehicle Code, and any regulations of the Insurance Commissioner pertaining to vehicle towing or storage fees, or both, adopted pursuant to Sections 758.5 and 790.03 of the Insurance Code, to carry out the provisions of this section.

October 19, 2025

Page | 3

If your clients claim a right to assert a mechanic's lien, please provide the basis for asserting a lien.

SoCal SuperBikes is a suspended corporation operating without a BAR license, DMV license, of CDTFA seller's permit.

If your clients have any legal basis to refuse to return my clients' motorcycle immediately, please let me know.

The motorcycle will be inspected to verify that the repairs your clients' claim to have performed were actually performed.

Your first email indicated: "Regardless, my client has your employee's motorcycle and is ready to return it and has been trying to return it, but your client has refused to pick it up. The motorcycle would be returned at no charge and has been available for retrieval by your client at no charge."

Please have your clients provide any texts, emails or phone call records to support that allegation. My clients have heard nothing from yours since 9/27/2025 at 10:19:54 AM.

While I appreciate your suggestion to connect the clients and keep the attorneys out of it, I'm sure you can understand that my clients are not comfortable dealing directly with your clients after receiving threatening messages. Nor are they comfortable riding a motorcycle with "bent forks" that was purportedly repaired under these circumstances.

Carlo Aguilar will get in touch with you to have your clients either return this motorcycle immediately, or provide specific dates and times for a tow truck to arrive. If they prefer to have a tow truck pick it up, then please confirm that they will have it ready and available for pick-up on either of the following times:

Tuesday 10/21/2025; 9:00-10:00 AM

Thursday 10/23/2025; 9:00-10:00 AM

Saturday 10/25/2025; 9:00-10:00 AM

Thank you, I look forward to your client's response to the questions above.

Sincerely,

/s/ David D. Bibiyan

David D. Bibiyan

EXHIBIT G

Attorney or Party without Attorney: KEVIN D. CHAFFIN (SBN 193245) CHAFFIN LAW 2829 Townsgate road suite 100 Westlake Village, CA 91361 Telephone No: (805) 650-8200 Attorney For: PLAINTIFF	FOR COURT USE ONLY
Insert name of Court, and Judicial District and Branch Court: SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE COUNTY OF ORANGE	
PLAINTIFF / PETITIONER: DANIEL CHAFFIN, Individually and on behalf of all other similarly situated DEFENDANT / RESPONDENT: SOCAL SUPERBIKES, a California corporation; et al.	CASE NUMBER: 30-2025-01532976-CU-FR-CX
PROOF OF SERVICE OF SUMMONS	Ref. No. or File No.: SOCAL SUPERBIKES

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of the SUMMONS; COMPLAINT; STATEMENT OF DAMAGES; AMENDMENT TO COMPLAINT; DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS X4;
3. a. Party served: ALEXANDER JASON QUINTERO, an individual, I identified the defendant by name, tried to hand him the documents He refused service/evaded service by entering his truck and driving away. I informed him he was being served and left the documents at the front door/in his immediate vicinity.
4. Address where the party was served: 709 Gregory Street, Garland, TX 75041
5. I served the party:
 - a. by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): Wed, Jan 14 2026 (2) at (time): 11:15 AM
 - (1) ☐ (business)
 - (2) ☒ (home)
 - (3) ☐ (other):
6. The "Notice to the Person Served" (on the summons) was completed as follows:
 - a. ☒ as an individual defendant.
 - b. ☐ as the person sued under the fictitious name of (specify):
 - c. ☐ as occupant.
 - d. ☐ On behalf of (specify):
under the following Code of Civil Procedure section:

☐ 416.10 (corporation)	☐ 415.95 (business organization, form unknown)
☐ 416.20 (defunct corporation)	☐ 416.60 (minor)
☐ 416.30 (joint stock company/association)	☐ 416.70 (ward or conservatee)
☐ 416.40 (association or partnership)	☐ 416.90 (authorized person)
☐ 416.50 (public entity)	☐ 415.46 (occupant)
☐ other:	



Plaintiff: DANIEL CHAFFIN, Individually and on behalf of all other similarly situated
Defendant: SOCAL SUPERBIKES, a California corporation; et al.

Case Number:
30-2025-01532976-CU-FR-CX

Recoverable cost Per CCP 1033.5(a)(4)(B)

7. Person who served papers

- a. Name: Kim Shaw
b. Address: FIRST LEGAL
5450 Ralston Street, Ste. 111
VENTURA, CA 93003
c. Telephone number: (805) 654-1535
d. The fee for service was: 618.60
e. I am:
(1) ☒ not a registered California process server.
(2) ☐ exempt from registration under Business and Professions Code section 22350(b).
(3) ☐ a registered California process server:
(i) ☐ owner ☐ employee ☐ independent contractor
(ii) Registration No:
(iii) County:

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

01/15/2026

(Date)



Kim Shaw



EXHIBIT H

Text message
9/17/2025 3:03:03 PM

WE ARE FINISHING UP ON YOUR AUTHORIZED REPAIRS THE BIKE SHOULD BE READY FOR PICK UP THIS SATURDAY SEPT 20, 2025
WE DID FIND THAT THE FORKS ARE BENT THEREFOR THEY MIGHT LEAK AGAIN IN THE NEAR FUTURE
LET ME KNOW IF THATS SOMETHING YOU WOULD LIKE TO REPLACE
THANK YOU
STOP to opt out

What is the status on all the repairs? Oil pump? Tires? What has been done?

Are you saying the forks needs to be replaced? If yes what cost?

I'm in meeting til 7pm plz text as much as possible will call when I can

Or voicemail is fine

9/19/2025 11:31:20 AM

All of your repairs are done..
the forks are no longer available but we can explore other avenues
STOP to opt out

I am in a meeting. I didn't see a text or voicemail in response to your prior text. I am unclear about the forks, as the bike was supposedly inspected when we dropped it off, inspected again, and then inspected in detail a third time, including estimates estimates that were updated to include oil pump, etc. It wasn't until your text message that anyone said anything about the forks being bent or needing to be replaced or possibility of future leaks. I am unclear how that issue with the forks was not discovered earlier when we were told repeatedly that the bike was inspected that the estimate was thorough and clear. What is the exact condition of the forks right now? What does it mean that they are not available? Meaning OEM replacement forks are not available? Thank you.

Voice transcribed

I am in a meeting for several hours and preparing to speak at a memorial service tomorrow, so I don't have time to talk at the moment. Just need information about the forks on what was done.

Was there anything else besides the bent forks that you found when the shop did the actual inspection besides the oil pump question was the oil pump?

9/19/2025 7:26:40 PM

forks were discover to be bend upon rebuild
fork rebuild is complete
all repairs are done
OEM forks are not available
your bike is ready for pick up
hope to see you soon
STOP to opt out

9/26/2025 11:58:08 AM

Hello i understand your busy, hope everything is ok. Do you know when you might be able to come pick up your bike from the shop we are booked and would like to free up space.
please give us a call or text is fine.
STOP to opt out

I haven't even seen a bill



74ab2e15-9fef-4b7e-8387-30fcac020e37-estimate.pdf



Hi KEVIN ,

Below is a link to the estimate you requested from Socal Superbikes. Please review and let us know if you have any questions.
<https://smky.app/t8qr89>
STOP to opt out

if you click on the link it will pull the work order
STOP to opt out

I need to talk to Dan. Gone this weekend. Estimate and last doc says Erik but I don't have his number for a couple questions

erik is no longer here

STOP to opt out

9/27/2025 10:19:54 AM

FYI your bike has been ready for pick up since 9/19/25 please be advise that we do give one week curtsey after that we charge 100dl per day storage starting next week on Tuesday we will begin the charges, please reach out we can recommend tow companies thank you for your business and patience
STOP to opt out



EXHIBIT H

SoCal Superbikes

10632 Garden Grove Blvd Unit B, Garden Grove, CA 92843, United States

[Write a review](#)

4.4 ★★★★★ 111 reviews ⓘ

 5 reviews · 1 photo

★★★★★ a year ago

I called this place to get an estimate on a Valve Adjustment Service and new Spark Plugs for my bike. I got a negative vibe right off the bat when Eric rudely answered the phone. After briefly telling him what I needed done, he didn't ask any questions about my bike and made no attempts to earn my trust or business. He then proceeded to put me on a 5 minute wait just to put together a quote. His quote ranged from \$859-2,000 and he didn't even bother explaining what the service would entail. I wouldn't trust this guy anywhere near my bike just based off my initial interaction.

♡ 3 ↗

 **Stephanie Garcia**
1 review

★★★★★ 8 months ago

Eric is rude they don't communicate with you they keep ur bike in the hot sun and change workers all the time there customer service sucks like Eric u call and they don't answer and they never inform u on anything and one day I went in there and saw with my own eyes taking parts off other customers bikes and the mechanic says well they have me do that here very unprofessional they can careless about people watch out for this shop they suck and will make there mess ur stress And Eric you need a new occupation because doing ur customers dirty will get u no where

♡ 6 ↗

SoCal Superbikes

10632 Garden Grove Blvd Unit B, Garden Grove, CA 92843, United States

[Write a review](#)

4.4  111 reviews ⓘ

All

dyno tune 6

tire installation 5

tire mounting 4

bike tuning 3

+6

Sort by

Most relevant

Newest

Highest rating

Lowest rating



KJ Ve

10 reviews



 5 months ago

I came into this shop multiple times for the same issue, out of laziness of not doing the work myself. I've had the bike for multiple years and as of recent, the clutch issues came in, starting around November of last year. And since then, 3 times total I have came in, said the fix the bike I get it back bike toasts in a few days of riding. Back to the shop. I finally decide to open up the bike, side panel for the clutch, **and at the bottom I see a metal spacer and a broken bolt not native to my bike.** Now im pissed and would like refund



2



SoCal Superbikes

10632 Garden Grove Blvd Unit B, Garden Grove, CA 92843, United States

[Write a review](#)

4.4 ★★★★★ 111 reviews ⓘ



Justin Copp

7 reviews · 5 photos

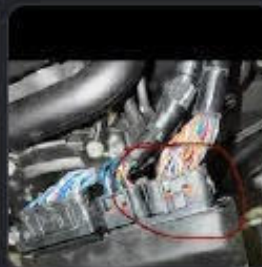


★★★★★ 3 years ago

They had my '22 R1 in the shop for 2 weeks for a tune. They just kept telling me that they were "fine tuning it". On week 2, I asked for the bike to be done as I was over the waiting and guessing game. Called them the night before, and they swore it was done. So, I make the hour and a half commute to the shop, just for them to tell me they were "still having issues tuning". Had to wait 5 HOURS with no completion. Ended up getting a refund and had the bike flashed to "stock". Was pretty upset at this point. They had no clue what they were doing. Even admitted it in the end. I get home, and finally took it to a legitimate tuner, just for him to show me how **they broke the connector for the ECU harness when they had to repin it back to US!! Didn't say anything about it, and they knew about it.** Completely messed it up. **They even forgot the nut to tighten the gas tank down. Complete joke.** They had similar wait times for my second bike also. Will never be back.

Services

Brake service & repair



6



SoCal Superbikes

10632 Garden Grove Blvd Unit B, Garden Grove, CA 92843, United States

[Write a review](#)

4.4  111 reviews ⓘ



Vroom Vmmm
1 review



 3 years ago

Dude they will steal your engine & replace with a different one.

Services
Engine repair

  1 



Antonio Gandara
12 reviews



 4 years ago

Very bad service!

Services
General repairs

  3 



Meh
13 reviews · 4 photos



SoCal Superbikes

10632 Garden Grove Blvd Unit B, Garden Grove, CA 92843, United States

[Write a review](#)

4.4 ★★★★★ 111 reviews ⓘ



Jairo Sosa

1 review · 5 photos



★★★★★ a week ago **NEW**

Unprofessional and irresponsibles I took my honda cbr 600rr it was running good just had a problem on the harness so I brought them an new harness and then they wanted charge more and i just pay the work that they did (200 diagnostic and 400 mechanic) and **they literally charged me only for dismantling and taking apart my parts and stole some of my parts of the bike as the Servo buddy they took it off and stole it and literally they didn't work nothing on the bike and charged me 400. 0% recomendend**

♡ Hover to react



Chris Young

3 reviews



★★★★★ Edited 4 years ago

Negative

Quality, Professionalism, Value

Services

General repairs, Tires, Service not listed

♡ Hover to react

EXHIBIT J

NOTICE TO CONSUMERS REGARDING PENDING LITIGATION AND CONSUMER RIGHTS

SOCAL SUPERBIKES UNLICENSED OPERATIONS CLASS ACTION

Re: Daniel Chaffin v. SoCal SuperBikes, et al. Orange County Superior Court Case No. 30-2025-01532976-CU-FR-CXC

IMPORTANT CONSUMER SAFETY AND LEGAL RIGHTS INFORMATION

This notice is being sent to you because records indicate you may have obtained motorcycle inspection, diagnostic, repair, or modification services from SoCal SuperBikes between May 13, 2020, and February 18, 2026. This notice provides factual information about pending litigation and potential consumer rights under California law.

WHAT IS THIS CASE ABOUT?

A lawsuit has been filed in Orange County Superior Court alleging that SoCal SuperBikes and its operators violated California consumer protection laws by operating an unlicensed motorcycle repair business. The lawsuit seeks to represent California consumers who obtained services from SoCal SuperBikes during the time period when it allegedly operated without required state licensing.

CALIFORNIA BUREAU OF AUTOMOTIVE REPAIR FINDINGS

The California Bureau of Automotive Repair (BAR) issued two citations confirming unlicensed operations:

- Citation issued August 9, 2022: Ordering defendants to "cease all work which requires a valid registration" for operating without required Automotive Repair Dealer Registration in violation of Business and Professions Code section 9884.6(a).
- Citation with Order of Abatement issued December 10, 2025: Ordering defendants to "immediately cease and desist from violating Business and Professions Code §9884.6(a)" for continued unlicensed operations.

These are regulatory findings by the California Bureau of Automotive Repair, not court determinations of civil liability.

IMPORTANT SAFETY INFORMATION

Motorcycles require precision maintenance and repairs for safe operation, especially at highway speeds. Unlicensed motorcycle repair operations may pose safety risks because they are not subject to regulatory oversight, licensing requirements, or mandatory insurance that protect consumers. If you have concerns about work performed on your motorcycle, you may wish to have it inspected by a licensed automotive repair dealer.

POTENTIAL CONSUMER RIGHTS UNDER CALIFORNIA LAW

California Business and Professions Code section 9884.6(a) makes it unlawful to operate as an automotive repair dealer without proper licensing. Contracts for services performed by unlicensed operators may be void or unenforceable under California law.

Consumers who paid unlicensed operators may have rights to seek restitution under California's consumer protection laws, including the Consumers Legal Remedies Act (Civil Code § 1781) and Unfair Competition Law (Business and Professions Code § 17200).

Additionally, unlicensed operators cannot lawfully:

- Charge storage fees, assert mechanic's liens or sue on a contract for motor vehicle repairs (Cal. Bus. & Prof. Code § 9884.16)
- Provide valid warranties on parts or labor
- Offer consumer protections required of licensed dealers (Cal. Bus. & Prof. Code § 9884.9)

These are general statements about California consumer protection law. Individual circumstances vary, and this notice does not guarantee any specific outcome or recovery amount.

WHAT THIS NOTICE DOES NOT MEAN

- The court has NOT certified a class action
- The court has NOT determined that any laws were violated
- This lawsuit has NOT been decided
- You are NOT automatically represented by any attorney

- You are NOT required to take any action
- No money or benefits are currently available

PRESERVE YOUR RECORDS

Whether or not you choose to participate in this litigation, you may wish to preserve documents related to your dealings with SoCal SuperBikes, including:

- Receipts, invoices, or payment records
- Written estimates or work orders
- Communications (texts, emails, voicemails)
- Before/after photographs of your motorcycle
- Records of subsequent repairs or inspections

These records may be important for understanding your consumer rights under California law.

YOUR OPTIONS

You have several options:

1. Do nothing at this time
2. Contact counsel that filed this lawsuit for more information
3. Consult with your own attorney about your individual situation
4. Monitor the case through public court records

If you choose to contact counsel that filed this lawsuit, there is no obligation to participate in the lawsuit.

FOR MORE INFORMATION

If you wish to learn more about this case or your potential rights under California consumer protection law, you may contact counsel that filed this lawsuit:

Kevin D. Chaffin, Esq. Chaffin Law 2829 Townsgate Road, Suite 100 Westlake Village, CA 91361 Telephone: (805) 650-8200 Email: info@chaffinlaw.com

You may also access public court documents by visiting the Orange County Superior Court website or by contacting the court clerk.

IMPORTANT DISCLAIMERS

- This notice is for informational purposes only
- This notice does not constitute legal advice
- Receipt of this notice does not mean you are represented by any attorney
- No attorney-client relationship is created by this notice
- Individual legal questions require consultation with an attorney
- This notice has been approved by the court for dissemination

DO NOT CONTACT THE COURT ABOUT THIS NOTICE

Date of Notice: [DATE]

**THIS NOTICE AUTHORIZED BY ORDER OF THE SUPERIOR COURT OF
CALIFORNIA FOR THE COUNTY OF ORANGE**

PROOF OF SERVICE

DANIEL CHAFFIN v. SOCAL SUPERBIKES et al.

Orange County Superior Court Case No. **30-2025-01532976-CU-FR-CXC**

I am Counsel for Plaintiff(s) in this action, employed in the County of Ventura, State of California. I am over the age of 18 and not a party to the within action; my business address is Chaffin Law, 2829 Townsgate Road Suite 100, Westlake Village, CA 91361.

On April __, 2026, I served a copy of the foregoing document alleged as **DECLARATION OF KEVIN D. CHAFFIN IN SUPPORT OF MOTION FOR COURT APPROVAL OF LIMITED NOTICE TO CONSUMERS AND PUTATIVE CLASS MEMBERS** on the interested parties in this action addressed as follows:

SEE ATTACHED SERVICE LIST

- ☐ **BY MAIL** (CCP §1013(a) and (b)): I am readily familiar with the firm's practice of collection and processing correspondence for mailing with the U.S. Postal Service. Under that practice such envelope(s) is deposited with the U.S. Postal Service on the same day this declaration was executed, with postage thereon fully prepaid at 9425 Telephone Rd. #445, Ventura, CA 93004, in the ordinary course of business.
- ☐ **BY PERSONAL SERVICE** (CCP §1011): I caused to be served by hand to the addressee(s) as stated above via
- ☐ **BY OVERNIGHT DELIVERY** (CCP §1013(c) and (d)): I am readily familiar with the firm's practice of collection and processing items for delivery with Overnight Delivery. Under that practice such envelope(s) is deposited at a facility regularly maintained by Overnight Delivery or delivered to an authorized courier or driver authorized by Overnight Delivery to receive such envelope(s), on the same day this declaration was executed, with delivery fees fully provided for at 9601 Wilshire Boulevard, 7th Floor, Beverly Hills, California 90210, in the ordinary course of business.
- ☐ **BY FACSIMILE** CCP §1013(e), (f) and CRC Rule 2008: I served the above stated document by facsimile from the facsimile machine of Chaffin Law Office whose fax number is 805.650.8200
- ☐ **BY ELECTRONIC TRANSMISSION.** Based on Code of Civil Procedure §1010.6(b) or a Court order or an agreement of the parties to accept service by electronic transmission, I caused the document to be sent to the persons at the e-mail addresses listed herein. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

Executed on April __, 2026 at Pico Rivera, California.

- ☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Liza Quinonez
Print Name

Signature

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SERVICE LIST

DANIEL CHAFFIN v. SOCAL SUPERBIKES et al.

Orange County Superior Court Case No. **30-2025-01532976-CU-FR-CXC**

DEFAULT ENTERED AGAINST DEFENDANTS:

SOCAL SUPERBIKES, a California corporation

ALEXANDER JASON QUINTERO

JORGE LUIS GONZALEZ

JAZMINE GONZALEZ QUINTERO

1 CHAFFIN LAW
Kevin D. Chaffin (SBN 193245)
2 E-mail: kevin@chaffinlaw.com
2829 Townsgate Road Suite 100
3 Westlake Village, California 91361
Tel: (805) 650-8200

4 SIDHU LAW, APC
Peter Sidhu (SBN 355013)
5 E-mail: peter@sidhulawapc.com
1601 Carmen Drive Suite 110A
6 Camarillo, California 93010
Tel: (805) 222-4761

7
8 Attorneys for Plaintiff DANIEL CHAFFIN,
an individual
9

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF ORANGE**

12 DANIEL CHAFFIN, individually and on
13 behalf of all others similarly situated,

14 Plaintiff,

15 v.

16 SOCAL SUPERBIKES, a California
corporation; ALEXANDER JASON
17 QUINTERO, an individual, JORGE LUIS
18 GONZALEZ, an individual, JAZMINE
GONZALEZ QUINTERO, an individual,
19 ERIK MORA, an individual, and DOES 1
through 25, inclusive,

20 Defendants.
21
22
23

CASE NO. 30-2025-01532976-CU-FR-CXC
Reservation #74828013

**MOTION FOR COURT APPROVAL OF
LIMITED NOTICE TO CONSUMERS
AND PUTATIVE CLASS MEMBERS**

*(Parris v. Superior Court (2003) 109
Cal.App.4th 285, 297)*

Date: June 1, 2026
Time: 1:30 p.m.
Dept.: CX103

Assigned for All Purposes to:
The Honorable David A. Hoffer
The Honorable Lon Hurwitz

Class Cert. Filing Deadline: July 28, 2026
CMC Date: July 28, 2026
Default Prove-Up Hearing Date: July 28, 2026

[Filed Concurrently with Declaration of Kevin
D. Chaffin Motion for Court Approval of
Limited Notice to Consumers and Putative
Class Members]

[Filed Concurrently with [Proposed] Order]

TO THE HONORABLE COURT:

Plaintiff DANIEL CHAFFIN respectfully moves this Court for an Order approving a pre-certification communication plan to notify putative class members of the pendency of this action, the California Bureau of Automotive Repair citations confirming Defendants' unlicensed operations, and the implications for consumer rights and safety. This Motion seeks court approval of a specific, neutral notice to prevent any impropriety and to serve legitimate case management and consumer protection purposes.

This Motion is made pursuant to Code of Civil Procedure section 382, Civil Code section 1781(d), California Rules of Court 3.766 and 3.770(c), and this Court's inherent authority to manage class action proceedings. This Motion is based upon the Complaint on file herein, the Declaration of Kevin D. Chaffin filed herewith, the proposed Notice attached as Exhibit J to the Declaration, and all papers and pleadings on file in this action.

I. INTRODUCTION

This case involves systematic consumer fraud perpetrated by Defendants through unlicensed operation of a motorcycle repair business serving thousands of California consumers over nearly six years. (Declaration of Kevin D. Chaffin ("Chaffin Decl.") ¶ 3.) The California Bureau of Automotive Repair issued two citations confirming that Defendants operated without required licensing from incorporation (May 13, 2020) through February 18, 2026, in violation of Business and Professions Code section 9884.6(a). (Chaffin Decl. ¶ 3; Exhibits A & B.)

All four named Defendants have defaulted and abandoned their business operations after eviction from their premises. (Chaffin Decl. ¶¶ 4, 8.) Critical evidence and business records are at immediate risk of being lost or destroyed. (Chaffin Decl. ¶ 14.) Class certification and default prove-up are both scheduled for July 28, 2026, creating urgency for consumer notification. (Chaffin Decl. ¶ 19.)

This is not a request for formal § 1781(d) certification notice, but rather a case management communication designed to protect absent class members' interests before certification.

1
2 **II. STATEMENT OF FACTS**

3 **A. Regulatory Violations Across Three Time Periods**

4 **PERIOD ONE (5/13/2020 - 8/9/2022): Initial Unlicensed Operations** The California
5 Bureau of Automotive Repair issued Citation on August 9, 2022, explicitly ordering Defendants to
6 "cease all work which requires a valid registration." (Chaffin Decl. ¶ 3; Exhibit A.)

7 **PERIOD TWO (8/9/2022 - 12/10/2025): Willful Violations After First Citation** Despite
8 the regulatory order, Defendants willfully continued unlicensed operations for an additional three
9 years and four months. (Chaffin Decl. ¶ 3.)

10 **PERIOD THREE (12/10/2025 - 2/18/2026): Criminal Violations After Order of**
11 **Abatement** The Bureau issued a second citation with Order of Abatement on December 10, 2025, yet
12 Defendants continued operating in direct violation. (Chaffin Decl. ¶ 3; Exhibit B.)

13 **B. Specific Endangerment Through Unsafe Motorcycle Repairs**

14 Plaintiff Daniel Chaffin entrusted his 2000 Suzuki Hayabusa GSX1300R motorcycle to
15 Defendants—a machine that holds the distinction of being the original superbike so fast it resulted in
16 an international agreement among manufacturers to limit motorcycle speeds after European regulators
17 threatened import bans due to the Hayabusa's unprecedented 194 mph capability. (Chaffin Decl. ¶ 9.)
18 Defendants returned the motorcycle with bent forks while falsely claiming they had "rebuilt the [bent]
19 fork seals" and the work was "complete." When questioned, Defendants threatened illegal \$100-per-
20 day storage fees. (Chaffin Decl. ¶ 9; Exhibit H.)

21 **C. Pattern of Deception and False Advertising**

22 After being served with this Complaint, Defendants posted false advertising claiming they
23 were "CLOSED FOR SPRING BREAK" when they had actually been evicted. Photographs show
24 their former location with cleaning supplies and mop buckets, confirming they were closed for post-
25 eviction Spring Cleaning, not vacation. (Chaffin Decl. ¶ 4; Exhibits D & E.)

26 Defendants went to extensive efforts to evade service, with one defendant running away from
27 a process server and jumping in his truck to speed away. (Chaffin Decl. ¶ 8; Exhibit G.)

1
2 **D. Business Abandonment and Evidence Preservation Urgency**

3 Early discovery reveals a putative class of over 3,000 California consumers. (Chaffin Decl. ¶
4 13.) Critical business records are at immediate risk as Defendants complete business dissolution.
5 Many putative class members are unaware of the litigation, BAR findings, or their legal rights.
6 (Chaffin Decl. ¶ 14.)

7 **III. LEGAL ARGUMENT**

8 **A. Pre-Certification Communications Are Constitutionally Protected**

9 "Pre-certification communication with potential class members, like pre-filing
10 communication, is constitutionally protected speech," and a "blanket requirement of judicial approval
11 for such communications would constitute an impermissible prior restraint on speech." (*Parris v.*
12 *Superior Court* (2003) 109 Cal.App.4th 285, 297.)

13 However, courts retain authority to oversee communications to prevent "specific impropriety"
14 and may approve proposed communications when presented for review. (*Pioneer Electronics (USA),*
15 *Inc. v. Superior Court* (2007) 40 Cal.4th 360, 373.)

16 **B. The Proposed Notice Serves Legitimate Case Management Purposes**

17 **1. Evidence Preservation:** Critical business records are at immediate risk of being lost as
18 Defendants complete their business dissolution. (Chaffin Decl. ¶ 14.)

19 **2. Public Safety:** The Notice emphasizes safety-related concerns because Defendants'
20 unlicensed motorcycle repairs create serious public safety hazards, as motorcycles require precision
21 maintenance for safe operation at highway speeds. (Chaffin Decl. ¶ 18.)

22 **3. Consumer Protection:** Under California law, all contracts with unlicensed automotive
23 repair dealers are void or unenforceable under Business and Professions Code section 9884.6(a),
24 entitling consumers to automatic restitution regardless of work quality.

25 **4. Case Management Urgency:** This Court has set July 28, 2026, as the deadline for class
26 certification motions. Given the compressed timeline and risk of evidence destruction, immediate
27 notice is necessary. (Chaffin Decl. ¶ 19.)

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2 **C. The Proposed Notice Content Is Neutral and Avoids Impropriety**

3 The proposed notice (Chaffin Decl., Exhibit J) includes neutral case information, factual
4 references to BAR citations, consumer rights information, safety emphasis, clear disclaimers, and
5 class counsel contact information. (Chaffin Decl. ¶ 17.)

6 **IV. CONCLUSION**

7 The proposed pre-certification notice serves critical case management and consumer
8 protection purposes. It will alert over 3,000 putative class members to preserve evidence, understand
9 their potential rights under California law, and protect against ongoing consumer harm—all while
10 avoiding any impropriety through neutral, factual content and clear disclaimers.

11 The notice is particularly warranted given:

12 - Defendants' six-year pattern of unlicensed operations confirmed by two BAR citations
13 (Chaffin Decl. ¶ 3; Exhibits A & B)

14 - Specific endangerment of motorcycle riders through unsafe repairs and illegal
15 practices (Chaffin Decl. ¶ 9; Exhibit H)

16 - Several thousand Consumers' right and need to know of Defendants' legal violations,
17 possible safety issues with their motorcycles

18 - Defendants' default status and business abandonment (Chaffin Decl. ¶¶ 4, 8; Exhibits
19 D & G)

20 - Evidence destruction risk and compressed timeline (Chaffin Decl. ¶¶ 14, 19)

21 For the foregoing reasons, Plaintiff respectfully requests that this Court approve the proposed
22 Notice and authorize its dissemination to putative class members.

23 Respectfully Submitted,

24 DATE: April 17, 2026

CHAFFIN LAW GROUP PC

25 /s/KDChaffin

26 Kevin D. Chaffin Esq.

27 Attorneys for Plaintiff Daniel Chaffin, individually
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DATE:

and on behalf of putative class members
SIDHU LAW, APC

Peter Sidhu Esq.
Attorneys for Plaintiff Daniel Chaffin, individually
and on behalf of putative class members

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PROOF OF SERVICE

DANIEL CHAFFIN v. SOCAL SUPERBIKES et al.
Orange County Superior Court Case No. **30-2025-01532976-CU-FR-CXC**

I am Counsel for Plaintiff(s) in this action, employed in the County of Ventura, State of California. I am over the age of 18 and not a party to the within action; my business address is Chaffin Law, 2829 Townsgate Road Suite 100, Westlake Village, CA 91361.

On April __, 2026, I served a copy of the foregoing document alleged as **MOTION FOR COURT APPROVAL OF LIMITED NOTICE TO CONSUMERS AND PUTATIVE CLASS MEMBERS** on the interested parties in this action addressed as follows:

SEE ATTACHED SERVICE LIST

- ☐ **BY MAIL** (CCP §1013(a) and (b)): I am readily familiar with the firm's practice of collection and processing correspondence for mailing with the U.S. Postal Service. Under that practice such envelope(s) is deposited with the U.S. Postal Service on the same day this declaration was executed, with postage thereon fully prepaid at 9425 Telephone Rd. #445, Ventura, CA 93004, in the ordinary course of business.
- ☐ **BY PERSONAL SERVICE** (CCP §1011): I caused to be served by hand to the addressee(s) as stated above via
- ☐ **BY OVERNIGHT DELIVERY** (CCP §1013(c) and (d)): I am readily familiar with the firm's practice of collection and processing items for delivery with Overnight Delivery. Under that practice such envelope(s) is deposited at a facility regularly maintained by Overnight Delivery or delivered to an authorized courier or driver authorized by Overnight Delivery to receive such envelope(s), on the same day this declaration was executed, with delivery fees fully provided for at 9601 Wilshire Boulevard, 7th Floor, Beverly Hills, California 90210, in the ordinary course of business.
- ☐ **BY FACSIMILE** CCP §1013(e), (f) and CRC Rule 2008: I served the above stated document by facsimile from the facsimile machine of Chaffin Law Office whose fax number is 805.650.8200
- ☐ **BY ELECTRONIC TRANSMISSION.** Based on Code of Civil Procedure §1010.6(b) or a Court order or an agreement of the parties to accept service by electronic transmission, I caused the document to be sent to the persons at the e-mail addresses listed herein. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

Executed on April __, 2026 at Pico Rivera, California.

- ☒ **(STATE)** I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Liza Quinonez
Print Name

Signature

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SERVICE LIST

DANIEL CHAFFIN v. SOCAL SUPERBIKES et al.

Orange County Superior Court Case No. **30-2025-01532976-CU-FR-CXC**

DEFAULT ENTERED AGAINST DEFENDANTS:

SOCAL SUPERBIKES, a California corporation

ALEXANDER JASON QUINTERO

JORGE LUIS GONZALEZ

JAZMINE GONZALEZ QUINTERO