

Exhibit A

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[EXEMPT FROM FILING FEES
UNDER GOV. CODE, § 6103]

Attorneys for the People of the State of California

SUPERIOR COURT OF THE STATE OF CALIFORNIA
KERN COUNTY

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

132 L ST LLC, 804 33RD STREET LLC, 2501 BISHOP DRIVE LLC, 1905 CALIFORNIA AVE LLC, 7728 NORTON AVE LLC, 1407 26TH ST LLC, 1927 D ST LLC, and SASSAN ROSTAMIAN,

Defendants.

Case No.

[PROPOSED] FINAL JUDGMENT AND PERMANENT INJUNCTION

The People of the State of California (“People”), appearing through their attorney, Rob Bonta, Attorney General of the State of California, by Deputy Attorney General Rachel Foodman, and 132 L St LLC, 804 33rd Street LLC, 2501 Bishop Drive LLC, 1905 California Ave LLC, 7728 Norton Ave LLC, 1407 26th St LLC, 1927 D St LLC, and Sassan Rostamian, (or “Defendants”), appearing through their attorney, Lawrence C. Ecoff of Ecoff Campain & Kay, LLP, having stipulated to the entry of this Judgment by the Court without the taking of proof and

1 without trial or adjudication of any fact or law, without this Judgment constituting evidence of or
2 an admission by Defendants regarding any issue of law or fact alleged in the Complaint, without
3 Defendants admitting any liability regarding allegations of violations that occurred prior to entry
4 of this Judgment as alleged in the Complaint, and with all parties having waived their right to
5 appeal from the Judgment, and the Court having considered the matter and good cause appearing:

6 **IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:**

7 1. This Court has jurisdiction over the allegations and subject matter of the People's
8 Complaint filed in this action, and the parties to this action; venue is proper in this County; and
9 this Court has jurisdiction to enter this Judgment.

10 2. Defendants do not admit to any violations of law alleged in the Complaint and do
11 not admit any wrongdoing that was or could have been alleged by the People before the date of
12 the Judgment under any law. No part of this Judgment, including its statements and commitments,
13 shall constitute evidence of any liability, fault, or wrongdoing by Defendants.

14 **INJUNCTION**

15 3. Nothing in this Judgment alters the requirements of federal or state law to the
16 extent they offer greater protection to consumers.

17 4. The injunctive provisions of this Judgment shall become effective immediately
18 upon entry of this Judgment and shall apply to Defendants as well as their successors and the
19 assigns of all or substantially all of the membership interests of their business, to any entity
20 engaged in the business of residential property rentals in which any individual Defendant is a
21 director, officer, partner, managing member, or manager, or over which any individual Defendant
22 otherwise exercises ownership, control, or management, and their directors, officers, employees,
23 agents, independent contractors, and representatives.

24 5. Defendants shall be and hereby are enjoined and restrained, under Business and
25 Professions Code section 17203, from directly or indirectly engaging in any act or practice that
26 violates the Tenant Protection Act, Civil Code sections 1946.2, 1947.12, or 1947.13, or any other
27 state or local law that governs residential rental housing evictions.

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1 pursuant to instructions the Attorney General will provide to Defendants. Within 30 days of the
2 entry of this Judgment, Defendants shall provide the Attorney General with the most recent
3 address and contact information known by Defendants for each tenant identified in the Attorney
4 General's investigation. The Attorney General shall then provide payment instructions to
5 Defendants. Within 30 days of receiving those instructions, Defendants shall send restitution
6 payments by check sent via certified mail. If mail is returned as undeliverable, Defendants shall
7 notify the Attorney General and re-mail a restitution check to any forwarding address provided by
8 the U.S. Postal Service, or to another address specified by the Attorney General. Defendants will
9 cooperate with any additional efforts by the Attorney General in locating said tenants.

10 12. Within 90 days after initial mailing of restitution offers, Defendants shall report to
11 the Attorney General on the status of all restitution payments, including an accounting of any
12 payments that have not been cashed or deposited, and shall provide the Attorney General copies
13 of all checks and certified mail forms. Any restitution funds unclaimed after six (6) months from
14 the date of the corresponding payment shall be remitted to the Attorney General pursuant to
15 instructions provided by the Attorney General. Those funds may be used, at the sole discretion of
16 the Attorney General, to pay additional restitution in this matter or for the Attorney General's
17 enforcement of consumer protection laws.

18 **ADDITIONAL PROVISIONS**

19 13. Jurisdiction is retained by the Court for the purpose of enabling any party to the
20 Judgment to apply to the Court at any time for such further orders and directions as may be
21 necessary or appropriate for the construction or the carrying out of this Judgment, for the
22 modification of any of the injunctive provisions hereof, for enforcement of compliance herewith,
23 and for the punishment of violations hereof, if any.

24 14. Any notices required to be sent to the People or to Defendants under this Judgment
25 shall be sent by email to the following. Any party may update its designee or address by sending
26 written notice to the other party informing them of the change.

27 a. For the People of the State of California:
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Deputy Attorney General Rachel Foodman
Deputy Attorney General Michael Novasky
Supervising Deputy Attorney General Tina Charoenpong
Consumer Protection Section
Office of the Attorney General
455 Golden Gate Ave, Suite 11000
San Francisco, CA 94102



b. For Defendants:

Sassan Rostamain
2249 Canyonback Rd.
Los Angeles, CA 90049
srostamian@aol.com

With a copy to:

Lawrence C. Ecoff, Esq.
Ecoff Campain & Kay, LLP
280 South Beverly Drive, Suite 504
Beverly Hills, CA 90212
ecoff@ecofflaw.com

15. The clerk is ordered to enter this Judgment forthwith.

ORDERED AND ADJUDGED at Bakersfield, California.

DATED: _____

JUDGE OF THE SUPERIOR COURT