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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
COUNTY OF YUBA

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

AMARDEEP DYAL,

Defendant.

Case No. CVCV24-00733

STIPULATION FOR ENTRY OF 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 A. Foodman, and Amardeep Dyal (“Defendant”), appearing pro per, stipulate as follows:

1. The Final Judgment and Permanent Injunction (“Judgment”), a true and correct copy of which is attached hereto as Exhibit A, may be entered by any judge of this Court.
2. Concurrently with the filing of this Stipulation, the People have filed their Complaint in this matter alleging that Defendant committed violations of Business and

1 Professions Code section 17200 et seq.

2 3. Defendant neither admits nor denies wrongdoing or liability of any kind but has
3 agreed, in order to avoid the expense and burden of litigation, to resolve the allegations contained
4 in the People's Complaint by entering into this Final Judgment.

5 4. The Court has jurisdiction over the subject matter of this action, jurisdiction over
6 the parties to this action, and venue is proper in this Court.

7 5. The People and Defendant (collectively, "Parties") waive their right to move to
8 set aside the Judgment through any collateral attack, and further waive their right to appeal from
9 the Judgment. Nothing herein shall waive any right to appeal from any decision in connection
10 with a future effort to enforce the Judgment.

11 6. The People may submit the Judgment to any judge or commissioner of the Court
12 for approval and signature, during the Court's *ex parte* calendar or through the Court's e-filing
13 system. Defendant waives the right to any personal notice of any such *ex parte* or electronic
14 submission of the Judgment to the Court.

15 7. The People and Defendant have agreed on a basis for settlement of the matters
16 alleged in the Complaint. The Parties agree to entry of the Judgment without the need for trial,
17 discovery in this action, or adjudication of any issue of law or fact. Defendant enters into this
18 Judgment freely and without coercion. Defendant acknowledges that it is able to abide by the
19 provisions of the Judgment. Defendant further acknowledges that a violation of this Judgment
20 may result in additional relief under section 17207 of the Business and Professions Code.

21 8. Defendant will accept service of any Notice of Entry of Judgment entered in this
22 action by electronic delivery to his personal e-mail, and agrees that service of the Notice of Entry
23 of Judgment will be deemed personal service upon Defendant for all purposes.

24 9. This Stipulation may be executed in counterparts, and the Parties agree that a
25 facsimile or scanned PDF signature shall be deemed to be, and shall have the same force and
26 effect as, an original signature.

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Dated: June 6, 2024

ROB BONTA, Attorney General of the State
of California



By: Michael Novasky
Deputy Attorney General
Attorney for Plaintiff

Dated: 4-22-2024

AMARDEEP DYAL

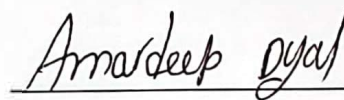


EXHIBIT A

[Proposed] Final Judgment & Permanent Injunction

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8 *California*

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF YUBA

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13 **THE PEOPLE OF THE STATE OF**
14 **CALIFORNIA,**

15
16 Plaintiff,

17 v.

18 **BOSANEK ENTERPRISES INC. (DBA**
19 **HERITAGE PROPERTY MANAGEMENT**
20 **SERVICES),**

21
22 Defendant

Case No. CVCV24-00733

**[PROPOSED] FINAL JUDGMENT AND
PERMANENT INJUNCTION**

23
24 The People of the State of California (“People”), appearing through their attorney, Rob
25 Bonta, Attorney General of the State of California, by Deputy Attorney General Rachel A.
26 Foodman, and Amardeep Dyal (“Defendant”), appearing pro per, having stipulated to the entry of
27 this Judgment by the Court without the taking of proof and without trial or adjudication of any
28 fact or law, without this Judgment constituting evidence of or an admission by Defendant

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

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

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

9 2. Nothing in this Judgment alters the requirements of federal or state law to the extent
10 they offer greater protection to consumers.

11 **INJUNCTION**

12 3. The injunctive provisions of this Judgment shall become effective immediately upon
13 entry of this Judgment and shall apply to Defendant and his agents or representatives with respect
14 to residential properties owned or controlled by Defendant in whole or in part, including
15 properties that Defendant controls through any third-party property management company.

16 4. Defendant shall be and hereby is enjoined and restrained from directly or indirectly
17 engaging in any of the following acts or practices with respect to any residential unit owned or
18 controlled in whole or in part by Defendant:

19 A. Imposing or attempting to impose rent increases, including by issuing or
20 enforcing rent increase notices, that exceed the limits imposed by state
21 laws, including but not limited to Civil Code section 1947.12, and local
22 ordinances;

23 B. Evicting or attempting to evict tenants, including by issuing or enforcing
24 eviction notices, in violation of any state laws, including but not limited to
25 Civil Code section 1946.2, or local ordinances;

26 5. For three years following entry of this Judgment, Defendant shall, at least ten days
27 prior to serving any eviction notice on a tenant residing in a residential property owned or
28 controlled by Defendant in whole or in part, deliver the eviction notice to the Attorney General

1 along with all documents necessary to substantiate the allegations contained in the notice. Where
2 there is an imminent threat to the health or safety of others, illegal activity, or nuisance, an
3 eviction notice may be delivered contemporaneously on the tenant and the Attorney General.

4 **MONETARY PROVISIONS**

5 6. Defendant shall pay \$23,000, as further described in Paragraphs 7-8 of this Judgment.
6 Payment shall be made within 45 calendar days of the date of entry of this Judgment, pursuant to
7 instructions provided by the Attorney General.

8 7. Of the aggregate sum, Defendant shall pay a total of \$2,000 in civil penalties under
9 Business and Professions Code section 17206.

10 8. Of the aggregate sum, Defendant shall pay a total of \$21,000 in restitution under
11 Business and Professions Code section 17203.

12 9. At its sole discretion, undistributed funds offered under this agreement shall be
13 deposited into the Unfair Competition Fund for the enforcement of consumer protection laws.

14 **ADDITIONAL PROVISIONS**

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

20 11. No part of this Judgment shall constitute evidence of any liability, fault, or
21 wrongdoing by Defendant.

22 12. Any notices required to be sent to the People or to Defendant under this Judgment
23 shall be sent by email and first class mail to the following. Any party may update its designee or
24 address by sending written notice to the other party informing them of the change.

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a. For the People of the State of California:

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Consumer Protection Section
Office of the Attorney General
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Michael.Novasky@doj.ca.gov
Tina.Charoenpong@doj.ca.gov

b. For Defendant:

Amardeep Dyal
3688 Kim Way
Yuba City, CA 95993

Amardeepdial@hotmail.com

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

ORDERED AND ADJUDGED at Marysville, California.

DATED: _____

JUDGE OF THE SUPERIOR COURT