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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

COMPLAINT FOR PERMANENT INJUNCTION, CIVIL PENALTIES, RESTITUTION, AND OTHER EQUITABLE RELIEF

(BUS. & PROF. CODE, § 17200 et seq.)

The People of the State of California (“People”), by Rob Bonta, Attorney General of the State of California, bring this action against Amardeep Dyal (“Dyal” or “Defendant”) for violating the Unfair Competition Law (Bus. & Prof. Code, § 17200 et seq.), and allege the following on information and belief:

1 **INTRODUCTION**

2 1. The People bring this civil enforcement action against Defendant for violations of
3 the unlawful prong of the Unfair Competition Law (“UCL”). These violations are predicated on
4 the Tenant Protection Act of 2019 (“TPA”).

5 2. Defendant violated the Tenant Protection Act by evicting the tenants at 1135
6 Nadene Street in Marysville, California, without just cause.

7 **DEFENDANT**

8 3. Defendant is the owner of the residential rental complex at 1127-1135 Nadene
9 Street, which he purchased in 2021.

10 **JURISDICTION AND VENUE**

11 4. This Court has jurisdiction over the allegations and subject matter of the People’s
12 Complaint filed in this action, brought under Business and Professions Code section 17200 et seq.

13 5. Venue is proper here because all violations of law alleged in this Complaint
14 occurred in this county.

15 **THE TENANT PROTECTION ACT**

16 6. In 2019, California enacted the TPA, which created significant new rent-increase
17 and eviction protections for most tenants.

18 7. When it enacted the TPA, the Legislature recognized the need to protect California
19 tenants from the financial destabilization frequently caused by large, unexpected rent increases. It
20 also recognized that placing limits on rent increases necessitated a corresponding prohibition on
21 evictions without justification, commonly referred to as a “just cause.” (Sen. Com. On Judiciary,
22 Analysis of Assem. Bill No 1482 (2019-2020 Reg. Sess.) July 8, 2019, p. 1.) Requiring a just-
23 cause basis for eviction prevents landlords from easily evicting tenants in order to reset unit rents
24 at higher rates than the rent-increase cap allows. It also recognizes the harm that unwarranted
25 displacement may cause tenants, including struggles to find new affordable housing, moving
26 expenses, longer commute times, and so forth. As such, the Tenant Protection Act permits
27 terminating tenancies for covered tenants only where there is a statutorily enumerated cause.
28 (Civ. Code, § 1946.2, subd. (b).)

1 **FIRST CAUSE OF ACTION**

2 **VIOLATION OF BUSINESS AND PROFESSIONS CODE SECTION 17200**

3 (Unfair Competition)

4 14. Plaintiff realleges paragraphs 1 through 12 and incorporates these paragraphs by
5 reference as if fully set forth in this cause of action.

6 15. Defendant has engaged in business acts or practices that constitute unfair
7 competition as defined in the Unfair Competition Law, Business and Professions Code section
8 17200 et seq. These acts or practices include, but are not limited to, evicting tenants without a
9 just-cause basis in violation of Civ. Code, § 1946.2.

10 **PRAYER FOR RELIEF**

11 WHEREFORE, the People pray for judgment as follows:

12 1. Under Business and Professions Code section 17203, that Defendant, and his
13 agents or representatives with respect to residential properties owned or controlled by Defendant
14 in whole or in part, including properties that Defendant controls through any third-party property
15 management company, be permanently enjoined from committing any unlawful, unfair, or
16 fraudulent acts of unfair competition in violation of Business and Professions Code section 17200
17 as alleged in this Complaint;

18 2. That the Court make such orders or judgments as may be necessary to prevent the
19 use or employment by Defendant of any practice that constitutes unfair competition or as may be
20 necessary to restore to any person in interest any money or property that may have been acquired
21 by means of such unfair competition, under the authority of Business and Professions Code
22 section 17203;

23 3. That the Court assess a civil penalty of \$2,500 against Defendant for each
24 violation of Business and Professions Code section 17200 in an amount according to proof, under
25 the authority of Business and Professions Code section 17206;

26 4. That the People recover its costs of suit, including costs of its investigation; and

27 5. For such other and further relief that the Court deems just and proper.

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Dated: June 6, 2024

Respectfully Submitted,

ROB BONTA
Attorney General of California



HUNTER LANDERHOLM
Deputy Attorney General