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5	MICHAEL NOVASKY (SBN 314370) Deputy Attorneys General	Superior Court of California County of Yuba		
6	1515 Clay Street, Suite 2000 Oakland, CA 94612	on 6/11/2024		
7	Telephone: (510) 879-0751 Fax: (415) 703-5480	by C Fuentes		
8	Email: Hunter.Landerholm@doj.ca.gov			
9	Attorneys for the People of the State of California			
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11	SUPERIOR COURT OF THE STATE OF CALIFORNIA			
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13	COUNTY OF YUBA			
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15	THE PEOPLE OF THE STATE OF CALIFORNIA,	Case No. CVCV24-00733		
16	Plaintiff,			
17	v.	COMPLAINT FOR PERMANENT INJUNCTION, CIVIL PENALTIES,		
18	AMARDEEP DYAL,	<b>RESTITUTION, AND OTHER EQUITABLE RELIEF</b>		
19	Defendant.	(BUS. & PROF. CODE, § 17200 et seq.)		
20	Derendant.			
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22				
23	The People of the State of California ("People"), by Rob Bonta, Attorney General of the			
24	State of California, bring this action against Amardeep Dyal ("Dyal" or "Defendant") for			
25	violating the Unfair Competition Law (Bus. & Prof. Code, § 17200 et seq.), and allege the			
26	following on information and belief:			
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	1			
	COMPLAINT			

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		
16 17	6. In 2019, California enacted the TPA, which created significant new rent-increase and eviction protections for most tenants.		
17	and eviction protections for most tenants.		
17 18	<ul><li>and eviction protections for most tenants.</li><li>7. When it enacted the TPA, the Legislature recognized the need to protect California</li></ul>		
17 18 19	<ul> <li>and eviction protections for most tenants.</li> <li>7. When it enacted the TPA, the Legislature recognized the need to protect California tenants from the financial destabilization frequently caused by large, unexpected rent increases. It</li> </ul>		
17 18 19 20	<ul> <li>and eviction protections for most tenants.</li> <li>7. When it enacted the TPA, the Legislature recognized the need to protect California tenants from the financial destabilization frequently caused by large, unexpected rent increases. It also recognized that placing limits on rent increases necessitated a corresponding prohibition on</li> </ul>		
17 18 19 20 21	and eviction protections for most tenants. 7. When it enacted the TPA, the Legislature recognized the need to protect California tenants from the financial destabilization frequently caused by large, unexpected rent increases. It also recognized that placing limits on rent increases necessitated a corresponding prohibition on evictions without justification, commonly referred to as a "just cause." (Sen. Com. On Judiciary,		
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> </ol>	and eviction protections for most tenants. 7. When it enacted the TPA, the Legislature recognized the need to protect California tenants from the financial destabilization frequently caused by large, unexpected rent increases. It also recognized that placing limits on rent increases necessitated a corresponding prohibition on evictions without justification, commonly referred to as a "just cause." (Sen. Com. On Judiciary, Analysis of Assem. Bill No 1482 (2019-2020 Reg. Sess.) July 8, 2019, p. 1.) Requiring a just-		
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<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> </ol>	and eviction protections for most tenants. 7. When it enacted the TPA, the Legislature recognized the need to protect California tenants from the financial destabilization frequently caused by large, unexpected rent increases. It also recognized that placing limits on rent increases necessitated a corresponding prohibition on evictions without justification, commonly referred to as a "just cause." (Sen. Com. On Judiciary, Analysis of Assem. Bill No 1482 (2019-2020 Reg. Sess.) July 8, 2019, p. 1.) Requiring a just- cause basis for eviction prevents landlords from easily evicting tenants in order to reset unit rents at higher rates than the rent-increase cap allows. It also recognizes the harm that unwarranted displacement may cause tenants, including struggles to find new affordable housing, moving		
<ol> <li>17</li> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> </ol>	and eviction protections for most tenants. 7. When it enacted the TPA, the Legislature recognized the need to protect California tenants from the financial destabilization frequently caused by large, unexpected rent increases. It also recognized that placing limits on rent increases necessitated a corresponding prohibition on evictions without justification, commonly referred to as a "just cause." (Sen. Com. On Judiciary, Analysis of Assem. Bill No 1482 (2019-2020 Reg. Sess.) July 8, 2019, p. 1.) Requiring a just- cause basis for eviction prevents landlords from easily evicting tenants in order to reset unit rents at higher rates than the rent-increase cap allows. It also recognizes the harm that unwarranted displacement may cause tenants, including struggles to find new affordable housing, moving expenses, longer commute times, and so forth. As such, the Tenant Protection Act permits		

8. As relevant here, one of the "just causes" for eviction set forth in the TPA is when
 the owner intends for themselves or a close relative to imminently move into the unit. (Civ. Code,
 § 1946.2 subd. (b)(2)(A).) Not any relative can justify evicting a tenant. Rather, the Legislature
 carefully restricted the list of qualifying relatives to the owner's "spouse, domestic partner,
 children, grandchildren, parents, or grandparents." (*Ibid.*) An owner utilizing this just cause
 should be able to show that the owner or a qualifying relative actually intends to occupy the
 relevant unit.

8

## **DEFENDANT'S BUSINESS PRACTICES**

9 9. In September 2021, Defendant purchased an apartment complex on Nadene Street,
10 which consists of two side-by-side duplexes that were occupied at the time of purchase. The
11 Nadene Street complex is covered by the Tenant Protection Act, meaning Defendant could only
12 evict the tenants for just cause.

13 10. Shortly after acquiring the Nadene Street complex, Defendant attempted to
14 verbally raise the rent of the tenants at 1135 Nadene Street beyond the rent caps in the Tenant
15 Protection Act. When the tenants objected, Defendant instead raised the rent by the maximum
16 permitted under the Tenant Protection Act.

17 11. In January 2022, Defendant, in coordination with his property management
18 company, Heritage Property Management ("Heritage"), served the tenants at 1135 Nadene Street
19 with an eviction notice. The notice checked the box for "Family Move-In" as the cause for the
20 eviction. Due to a separate defect with the notice, the eviction notice was re-issued in February
21 2022 with the same cause selected.

12. Feeling they had no choice, the tenants vacated the unit by early April 2022. But
no relative ever moved into their vacant unit. Instead, the unit was advertised for rent less than a
month later. Defendant, again working with Heritage, ultimately re-leased 1135 Nadene Street to
new tenants for nearly double the rent of the tenants who were evicted.

26 13. Defendant states that his uncle had planned to move into 1135 Nadene Street, but
27 was delayed, leading Defendant to re-advertise the unit. Even if true, an uncle is not a qualifying
28 relative under the Tenant Protection Act.

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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	4 COMPLAINT		

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	Dated: June 6, 2024 Respec	ctfully Submitted,
2	Rob B	ONTA
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5	5 Hunte	ER LANDERHOLM Attorney General
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	COMPLAINT	